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UC Comments on AAALAC International's Draft Position Statement on "The Culture of Care"

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Comments on AAALAC Culture of Care Position Statement

The University of California (UC) system – comprised of ten campuses, six academic health centers, the Lawrence Berkeley National Laboratory, and an Agriculture and Natural Resources division, appreciates the opportunity to comment on the AAALAC International's draft Position Statement on "The Culture of Care."

We provide the following comments for your consideration:

General:

UC sees the importance of turning the concept of "Culture of Care" into an institutional mindset, and as an AAALAC accredited institution, has already adopted it in our organizational culture. However, we remain unclear about the AAALAC's intent behind this Position Statement and the examples of implementation of the Statement's key components.

Specific:

1. First paragraph, third sentence:

"A good culture of care is demonstrated by promoting caring and respectful behavior towards animals and personnel, as well as instilling a sense of responsibility for sustaining processes of improvement."

UC recommends removing the term "good" as it is unnecessary given how the term "Culture of Care" is described in this statement (e.g., "exemplified by an organizational culture that goes beyond compliance with minimum standards of local, regional or national regulatory requirements."). Additionally, UC recommends capitalizing the term "culture of care" in that sentence as it is consistently capitalized elsewhere in the Statement. The sentence should read as follows:

"Culture of Care is demonstrated by promoting caring and respectful behavior towards animals and personnel, as well as instilling a sense of responsibility for sustaining processes of improvement."

2. Third paragraph, first sentence:

"The key components of a good Culture of Care include thoughtful consideration and active implementation of beneficial animal welfare and 3Rs practices for all species being maintained and worked with; promoting well-being of those caring for and working with research animals; an institutional emphasis on excellence in research quality and reproducibility, and the presence of mechanisms that foster institutional openness and societal transparency."

Similarly, UC recommends deleting "good" to describe Culture of Care for the same reason described above. The sentence should read as follows:

"The key components of a Culture of Care include thoughtful consideration and active implementation of beneficial animal welfare and 3Rs practices for all species being

maintained and worked with; promoting well-being of those caring for and working with research animals; an institutional emphasis on excellence in research quality and reproducibility, and the presence of mechanisms that foster institutional openness and societal transparency.”

3. First bullet point:

“Definition of institutional values and policies concerning animal care and use encouraged and fostered through internal communication. Information to new staff is important for the future consolidation of these values at the institution.”

UC recommends that the sentence be revised to emphasize the important role all institutionally affiliated persons involved in the use and care of animals play in creating and maintaining a Culture of Care at an institution. The sentence should read as follows:

“Definition of institutional values and policies concerning animal care and use is encouraged and fostered through internal communication with all institutionally affiliated persons involved in the use and care of animals. Conveying this information to new and existing persons involved in the use and care of animals is important for the consolidation of these values at the institution.”

4. Second bullet point:

“Coordination and cooperation between senior management and the IACUC/Oversight Body for commitment to and implementation of Culture of Care across the program, veterinary and animal care practices and staff.”

UC recommends including the word “including” since veterinary and animal care practices and staff are integral parts of the program. The first sentence of the second bullet point should read as follows:

“Coordination and cooperation between senior management and the IACUC/Oversight Body for commitment to and implementation of Culture of Care across the program, including veterinary and animal care practices and staff.”

5. First sentence, Seventh bullet point:

“Active promotion of 3R approaches when caring for and working with research animals.”

UC recommends that the sentence be revised to include the review of proposed research or teaching activities as a situation in which the use of 3R approaches should be actively promoted. The first sentence of the seventh bullet point should read as follows:

“Active promotion of 3R approaches when reviewing proposed research or teaching activities and caring for and working with research animals.”

Thank you for the opportunity to comment on the draft of AAALAC International's Position Statement on "Culture of Care." UC appreciates AAALAC's continuing efforts to ensure the health and well-being of animals used for research and teaching. We look forward to continued engagement on this important issue.