

Showtime! Should an IACUC oversee companion animal exhibition activities on campus?

One of the most popular clubs on the Great Eastern University campus was the Canine and Feline Exhibition Club, better known as the CAFE club. The club was open to any Great Eastern student who wanted to exhibit their pet in a traditional dog or cat show, or dog agility competitions. There were weekly meetings of the club where animal grooming, show information, health, training, and related topics were discussed. As with many other clubs on campus, the CAFE club had a faculty advisor who would provide advice and help club members as needed. However, the CAFE club's advisor, Dr. Jeremy West, had an additional role in the club. West was very experienced at preparing and handling dogs and cats at regional and national

shows and he often used his own or student animals to teach club members how to groom, train, and exhibit animals in shows.

In due time the Great Eastern IACUC office was informed about the activities of the CAFE club and asked if the club needed to have an IACUC protocol and approval for its animal training activities. The quick response from the office was no, these were privately-owned animals not used in any formal research or teaching, and therefore the IACUC did not need to become involved. But after some consideration, the director of the office began to have second thoughts. Dr. West was a university employee and the club met on university property. Although his teaching was not in a formal university course, there was no

question that animals were being used in an informal teaching activity for university students. Still, the teaching activity was more geared toward exhibition purposes than research purposes, so the director was not sure if IACUC approval was or was not required.

What is your opinion? Why or why not would the CAFE club's activities need IACUC approval? □

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Knowing is half the battle

We agree with the initial reaction of Great Eastern's IACUC. The activities of the CAFE club are

exempt from IACUC review because they do not include research or training of medical or veterinary students. That said, because

the club activities were brought forward, either by conscientious individuals who are involved in the club and want to ensure they are following all campus rules or by some outside entity who might have concerns about the club, the IACUC will need to respond definitively.

In cases of exempt activities at our institution, the IACUC can generate a "memo of exemption" upon request. This is a written notice that describes an activity and states that it is exempt from IACUC oversight, enabling participants in non-covered activities to receive a written assurance of compliance for their records.

In addition, our university has devised an IACUC process for on-campus extracurricular club activities. We use a protocol modification form, "Non-invasive, Non-painful Teaching Observations or Demonstrations." This is a simple form reviewed by designated member review, and it was created to reduce regulatory burden associated with noninvasive, non-painful veterinary teaching activities in routine coursework—for example, external palpation of anatomic landmarks during physical examination practice with student-owned dogs—under an approved "blanket" protocol. The form also has been used electively for club

A WORD FROM OLAW

In response to the issues posed in this scenario, the National Institutes of Health - Office of Laboratory Animal Welfare (NIH-OLAW) provide the following clarifications:

In this scenario, a university-supported club provides informal instruction on handling, grooming and training of pet dogs overseen by an experienced faculty advisor. The question raised is whether IACUC review and approval is required for these activities.

As noted by other reviewers, IACUC review of such informal activities is not a federal requirement because the animals are not undergoing manipulation for research or for training of medical or veterinary students^{1,2}. However, some IACUC oversight is advisable to ensure animal and human safety and limit liability to the institution should a pet be injured accidentally or cause harm to the students or others. A consent agreement with animal owners developed with legal counsel may also be a consideration. A university policy or standard operating procedure for the club that addresses animal vaccinations,

temperament, access to food and water, locations where animals are allowed, and how animals are to be restrained is a suggested approach. When the institution includes all animals regardless of the activities or funding source in the Assurance with OLAW, some form of IACUC oversight would be expected. However, there is flexibility in the use of policies or SOPs for non-research activities. □

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2. Public Health Service. Policy on Humane Care and Use of Laboratory Animals – Frequently Asked Questions. *Protocol Review, Question No. D.8.* (US Department of Health and Human Services, Washington, DC, 2006, revised 2013); http://grants.nih.gov/grants/olaw/faqs.htm#proto_8.

activities that don't technically require IACUC coverage.

We have experienced several advantages with the use of this form. First, it promotes forethought in club advisors when planning an animal-based activity or demonstration, hopefully preventing or minimizing on-the-fly decisions that may not be in the best interest

of the animal or the university. Second, the form helps the IACUC to be aware of such activities happening on campus, which supports positive relationships between clubs and the IACUC. Third, should a welfare concern arise related to club activities, the IACUC already has a reference point from which to start reviewing the concern. □

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What's the big deal?

In the United States Animal Welfare Act, §2132 Definitions, (g), "The term 'animal' means any live or dead dog, ... as the Secretary may determine is being used, or is intended for use, for research, testing, experimentation, or exhibition purposes, or as a pet; ..." (emphasis added). Thus, one could make a good case that Great Eastern University's IACUC approval is needed for the specified activities. IACUC approval would also be justified given the stated facts that the students and faculty advisor are associated with the university and, most importantly, that the activities involving the dogs are occurring on university property,

which at least implies university approval of the content of the activities.

All of these facts aside, what would be the harm of asking for IACUC approval? As described, the CAFE club's activities are unlikely to be controversial, nor would there seem to be any significant animal welfare issues since all of the dogs are owned by the participants; thus, a well-written protocol should have little problem being approved.

Finally, although the risk may be slim, there is always the possibility that one of the participants could be injured by an animal bite or physical trauma from mishandling of

the dogs. IACUC approval of a well-written protocol that includes adequate preventive procedures and "Hold harmless" agreements to be provided by participants could possibly mitigate the university's liability in such an event. □

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Regulations, funding and institutional responsibility

Whether or not IACUC approval is required for the CAFE club's activities depends on several factors. The first consideration is whether the animals are under the auspices of the Animal Welfare Act Regulations (AWAR) and/or Public Health Service (PHS) policy. The pet animals used by the CAFE club to teach members how to groom, train, and exhibit animals in show are not owned by the university. Therefore, the regulations do not apply and IACUC approval is not required. Per PHS Policy, the requirement for IACUC approval of the CAFE club's activities depends on whether Great Eastern University has an Animal Welfare Assurance and voluntarily includes all animals under their Assurance. If they do, then IACUC approval would be required¹⁻⁴.

A second consideration involves how the CAFE club and its activities are funded.

If funding is provided by a private agency, there are no federal or state laws that require the agency to obtain IACUC approval of animal use projects if the animals are not AWAR-regulated covered species. Nonetheless, private or public agencies may specifically require IACUC approval prior to release of funds. If the university has an Animal Welfare Assurance that commits the institution to comply with the PHS Policy for all animals, IACUC approval would be required regardless of funding source^{1,2}.

A final consideration is the university's ethical responsibility for the use of animals by the CAFE club. If there are no regulatory or funding agency requirements for IACUC approval, the university should have a mechanism in place to address all animal related activities on it campus, such as a written policy that covers the use of pets

or other privately owned animals used for CAFE club's activities². □

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