

despite changes of the CEO or the IO. A separate policy for the appointment of the IO should also be developed. That policy should stipulate what responsibilities and actions have been delegated by the CEO and include some statement regarding appointment or reappointment at the discretion of a new or interim CEO. The existence of such policies will help to obviate any questions regarding these appointments.

Finally, it is important to remember that any change to the CEO or IO must be reported to the USDA Animal Care Regional Office within ten days of its occurrence.

Dempsey is Assistant Vice Chancellor for Research and University Attending Veterinarian, North Carolina State University, Raleigh, NC. The author acknowledges input from the Veterinary Staff of the Laboratory Animal Resources department of the North Carolina State University College of Veterinary Medicine, including Drs. Richard Fish (Director), Melanie Rembert (Assistant Director), and Karen Taylor (Assistant Professor).

RESPONSE

No change in order

Erin Hutteman, AAS, BS, RLATG

In this scenario, the outgoing CEO of Great Eastern appointed the IO, who then appointed each member of the IACUC. The *Guide* states that “the size of the institution and the nature and extent of research, testing, and education programs will determine the number of members of the committee and their terms of appointment¹.” If the Great Eastern CEO adhered to the regulations and appointed the IO and the IACUC members for certain term periods, then they would not have to be reappointed by the new president of the university. Of course, at the end of their appointed term, the IO and IACUC member could be reappointed if they wished to continue serving.

Daniels is correct that the AWRs state that the CEO appoints the IACUC, but the law does not go into detail as to how an institution handles changes in leadership, except that such changes of operation must be reported to an Animal Care Regional Director. The AWRs defines the IO as someone who is authorized to legally commit on behalf of the research facility. Since the AWRs do not specifically address the CEO or appointment of an IO, one might indeed conclude that the CEO can delegate the appointment of the IACUC to another individual within the institution who can legally commit for the facility.

1. Institute for Laboratory Animal Research, National Research Council. *Guide for the Care and Use of Laboratory Animals* 8 (National Academy Press, Washington, DC, 1996).

Hutteman is Research and Training Coordinator, UCAR, University of Rochester, Rochester, NY.