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One animal, two protocols—an appropriate application of the 3Rs?

One of the IACUC's responsibilities is to help ensure that researchers use the least possible number of animals compatible with research requirements. Therefore, it seemed like a good idea to Patty Bergman to use the same animals for her own research that her colleague Yancy Wycroft was using for his research. His work involved behavioral testing of rabbits after exposure to different chemical scents, and hers required a weekly blood sample of 0.5 ml per rabbit. On the surface, this sounded like a fine idea to Craig Miller, the IACUC Chairman. Then Bergman clarified things. She wanted to have her own IACUC protocol, but do her experiments concurrently with those of her colleague, using the same animals he was using. This was a new twist for Miller. He had thought that Bergman planned on using the animals after Yancy was done with them.

"You know, Patty," Miller said, "since all you're planning on doing is taking a little

blood once a week from each of the rabbits, wouldn't it just be easier to amend Yancy's protocol by adding you as one of the research personnel and indicating you will just be taking the blood?"

"I thought of that," said Bergman, "but Yancy said he wasn't comfortable with that arrangement. He's very confident that my taking a little blood won't affect his own research in any way, but his NIH [National Institutes of Health] grant doesn't say anything about the kind of work I'm doing or about taking any blood. He's afraid that if I add my work onto his protocol, there might be questions at NIH about a change in the direction of the work."

"I understand what you mean," Miller said, "but he's not changing the direction or scope of the work under his grant; he's just letting you use his rabbits for an unrelated purpose that doesn't affect his own research."

"Thanks," said Bergman, "but I already tried that argument and it didn't get me anywhere. As a practical matter, I'd rather have my own protocol anyway and not have to worry if Yancy put in his protocol renewal on time or did anything else that might affect my research. My work is NIH-funded so if it's a real problem for the IACUC, I'll just purchase rabbits for bleeding rather than use Yancy's animals. I'm only making this request because I'm trying to save animals and save money. It seems like a win-win deal all around."

"It is a good idea," said Miller, "but I really have to think about the consequences and legality of doing this. Let me get back to you."

Can Patty Bergman have her own IACUC protocol but use Yancy Wycroft's rabbits for blood draws at the same time he is using them for an unrelated research purpose? What IACUC problems, if any, can you foresee?

RESPONSE

Key may be AV

Mary Ellen Goldberg, BS, VMT, LVT

When I first read this question, I thought, "This is an excellent idea. What is the big deal?" However, the matter should be examined more closely. Using the same rabbits for a weekly blood draw is relatively minor and I see no reason why Bergman couldn't write her own protocol and indicate that Wycroft's rabbits would be used concurrently in her research; this is an excellent way to reduce animal use. However, I can see the concern that Wycroft has about his NIH-funded work. It seems, however, that if Wycroft called his

Grant Administrator at NIH and discussed this matter, NIH would be more than willing to allow Bergman to draw blood from these rabbits, providing that it was done under the direction of the veterinary department. I might add that qualified technical personnel should be the ones to draw the blood from the rabbits so that they experience the least amount of pain and distress.

In *The IACUC Handbook*, Gracely writes the following regarding animal reuse: "The real question concerns reuse of an animal in a painful or distressing way after it has already been used in this way once." As noted in the proposed scenario, neither procedure is painful or distressing if performed by qualified, appropriate personnel¹.

However, the ARENA/OLAW *Institutional Animal Care and Use Committee Guidebook*

states, "While there is no explicit requirement for the IACUC to do a side-by-side comparison of the information contained in the IACUC protocol review form and the information submitted to the Public Health Service (PHS), it is imperative that the protocol that the IACUC approves is consistent with the information submitted to the PHS. Institutions should devise a mechanism to verify that consistency. If the IACUC requires changes to the protocol that are not reflected in the grant application, then the PHS funding component must be notified in the follow-up certification of IACUC approval²."

In light of the above regulations, I believe that one way to accomplish the joint animal use for research involving two Principal Investigators (PIs) with separate studies would be for the