

RESPONSE

Let Bergman wait

Lu Forrest, DVM

Bergman's primary consideration is keeping with the dictums of the 3Rs. Although ethical in spirit, the logistics of having two protocols attached to one animal creates an untenable management situation. According to an OLAW brochure for NIH grantees, "the use of animals must be congruent with the description in a competing grant application¹." With two separate protocols, the proverbial left hand may be oblivious to the deeds of the right. It is possible that either protocol might add procedures that would be unacceptable from an animal welfare standpoint, such as survival surgery, without the knowledge of the other party. Alterations in one research project could also negate the data collection of the other party—if new chemicals were added for example. In principle, one would hope that collaborators would communicate, but there is no way under this paradigm to ensure that communication.

It could also be quite difficult to fairly recharge each respective NIH grant depending on the nature of the study. If, for example, Bergman needed blood from one rabbit per week, but Wycroft had 50 in-house rabbits, what would be the recharge rate for NIH?

Thus it would seem that there are really two reasonable ways for these researchers to use the same animals. One way is to create a singular protocol together after having received approval from NIH for the procedural changes. The reluctance of both researchers to proceed in this fashion indicates that this option may not be

workable. Another possibility that I believe to be better suited to this situation is for the animals that are remaining from Wycroft's project to be transferred to Bergman (presuming that the research constraints allow this to occur, which might not be the case if rabbits are sacrificed for tissue harvest in Wycroft's study, for example). This would also allow Bergman to transfer other rabbits from other researchers' studies should they become available, again fulfilling the dictums of the 3Rs.

1. OLAW. What Investigators Need to Know About the Use of Animals. <http://grants.nih.gov/grants/olaw/InvestigatorsNeed2Know.pdf>.

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No accountability

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The intent in submitting a proposal to the IACUC is to provide accountability for the animals being used for research. Accountability includes providing documentation and proof of what each animal is expected to endure during a particular study.

Concurrently running protocols on the same animals violates the requirement to declare all PIs and personnel working on the IACUC proposal because it undermines the accountability requirement. Everyone must be listed so that the IACUC can determine if the personnel are qualified¹⁻³. Maintaining separate protocols for experiments on the same animals appears suspicious, as though the researchers are trying to hide something and somehow subvert full disclosure to the NIH or

granting agency. Two protocols violates the spirit and wording of grant rules.

Creating a second protocol applying to the same animals undermines the ability to care for and singly account for the animals. If one of the rabbits became ill, there would be no clear recourse as to which PI can authorize treatment or euthanasia options. To carry Bergman's own argument through further, what if Wycroft's protocol is suspended for review? It would be easy to deny knowledge of the other studies taking place on his animals and difficult to localize the true source of the problem inciting the review.

While the researchers should be commended for their willingness to reduce the number of animals used, this particular proposition will not work. There remain several viable options. The first is to modify the existing Wycroft IACUC proposal to include Bergman's blood work as initially discussed. Routine blood work is often included in studies to confirm the health status of the participants. It would be unlikely the NIH would consider it a deviation from the original protocol. Depending on the time required to finish Bergman's study, Wycroft could wait and transfer the rabbits to her own protocol when available. The final option is to purchase new rabbits. Even though the final option requires new animals, it still provides the accountability to prove they receive appropriate care.

1. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* (US Department of Health and Human Services, Washington, DC, 1986; reprinted 2002).
2. ARENA/OLAW. *Institutional Animal Care and Use Committee Guidebook* 2nd edn. (National Institutes of Health, Bethesda, MD, 2002).
3. Animal Component of Research Protocol, Version 3, Main Body. <http://www.researchtraining.org/referenceddocuments/animalrefs/acorp/draftacorphome.html>.

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