

I applaud the attempt to reduce regulatory burden, but fail to see how some of the suggestions pertain to performance standards for animal welfare. Providing a list of items that are not considered significant is welcome, but requiring the IACUC staff to spend precious committee time reporting them to the committee is ridiculous. My committee does not need to listen to a recounting of corrected typographical errors, grammar or contact information updates. These items don't pertain to animal welfare, unless the error involved listed an incorrect drug, which would already be counted as a significant change and require review.

The IACUC also should not have to deal with animals changing housing space within a facility that is already inspected and approved by the IACUC. The status of a room that is deemed acceptable for occupation or the animals in it should not need to be brought to the attention of the IACUC until the next inspection or a dramatic change, such as HVAC failure or loss of electricity, has occurred.

Additionally requiring a change in PI to be treated as significant is naïve, and discounts those instances where the PI contracts a facility to perform research. The PI frequently does not interact with the animals or have direct oversight of the work. This PI also may be replaced on a project due to the desires of his/her employer. When the PI is overseeing a graduate student project or their own work, a change here could be considered more significant, but even in that situation a more significant person might be the post-doc who actually works with the students and animals and provides hands-on training, which makes review of their qualifications more directly related to animal welfare. Still the IACUC staff should be able to review the qualifications without burdening the IACUC. At the very least the designation of specific personnel changes as significant should be at the discretion of the committee who is familiar with the type of research and training that occurs at their facility and the qualifications of the IACUC staff to make the assessment.

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The opinions expressed here are my own and may not be the same as others at my institution.