Comment on AAALAC International and Compliance With Animal Welfare Laws

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Comment on AAALAC International and Compliance With Animal Welfare Laws

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We write today in reference to the article entitled, “Does Accreditation by the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC) Ensure Greater Compliance With Animal Welfare Laws?” by People for the Ethical Treatment of Animals associates Justin R. Goodman, Alka Chandna, and Casey Borch, published in Volume 18 (2015) of the Journal of Applied Animal Welfare Science. The publication of this article, in which the authors purported that AAALAC-accredited institutions were more frequently cited for noncompliance items (NCIs) during inspections by the U.S. Department of Agriculture (USDA) Animal Care (AC) inspectors than institutions that are not accredited, was factually inaccurate and does a disservice to the community of individuals and organizations who support and participate in AAALAC International’s accreditation program. A prepublication draft of the article was released to science journalists and stimulated some international news coverage with a detrimental impact on our organization. The authors’ biased perspective was presented before a rigorous and independent review of the authors’ data and before statistical analysis and interpretations could be conducted by AAALAC International and other interested scientists.

Based upon review of the prepublication manuscript and questions about the authors’ data collection and categorization for analysis, C.E.N. appealed to two of the authors (Goodman and Chandna) to share their data set of compiled data on USDA research animal facility inspection report findings for 2010 and 2011. Most credible scientists would be willing and obligated to share their data with others; however, they declined. Working from the authors’ actual data set would have allowed verification (or not) of their findings. Even for the interval they examined, the re-creation of the data set is an unreliable process providing a variable output using the Animal Care Information System Search Engine (https://acissearch.aphis.usda.gov/LPASearch/faces/Warning.jspx). This database is reported to be unstable and variable due to flaws in the original design of the search engine. Queries using identical search parameters conducted at different times may yield quite different data precluding a reliable reconstruction effort.

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We acquired and analyzed a date-verified data set of NCIs from 2010 research animal facility inspection reports elsewhere (courtesy of T. Bennett, National Association for Biomedical Research) and have identified multiple sources of inaccuracy and potential bias in it that would also apply to the authors’ comparable database:

- The fundamental data set contains errors and unclear listings of unit names and sites, some of which would have been clear to the authors and some of which they could not have known.
- The authors defined and collected NCI data on a “facility” by using the USDA Research Animal Facility (RAF) license number. However, USDA RAF license numbers do not correspond reliably in a one-on-one fashion to AAALAC-accredited programs.
- AAALAC International may accredit only one or two independent programs in an institution, with multiple research programs leading to the prospect that NCIs attributed to nonaccredited programs on the campus would be improperly categorized as AAALAC-accredited by virtue of sharing a common USDA RAF license.
- Some organizations have multiple USDA RAF licenses, which might not have been handled consistently during data categorization by accreditation status.
- Some AAALAC-accredited programs decline to list their names on the AAALAC website or other public sites. The authors could not know with any degree of accuracy which of the USDA records were from accredited or nonaccredited institutions.

There are problems with the underlying relevance, integrity, and validity of the data points used in the authors’ analysis—that is, total NCIs, both direct and indirect. We chose not to attempt to analyze these meritless data. Despite the authors’ apparent awareness of the vagaries of the NCIs as data points, they continued to press ahead stating, “We did not differentiate between the two [direct versus indirect NCIs] for the study because the labels are applied inconsistently and, as the USDA has acknowledged, the dichotomy does not sufficiently describe whether the health and well being of animals were compromised as a result of the NCIs” (Goodman et al., 2015, p. 85).

The authors reiterate this point in the Discussion section and highlight another vagary of the NCI designation noting that “a single NCI may reflect a minor issue, but it can also indicate problems that are quite severe and pervasive …” (Goodman et al., 2015, p. 89). There are other reasons to question the value of NCIs as meaningful and consistent measures of quality performance. Even if the authors had clear data point identification of “non-AAALAC” and “AAALAC” (accredited) as labels for the independent variables, the authors failed to appreciate that the two groups have vastly different compositions: in particular, organizational size and scope of the research mission. The AAALAC-accredited group contains virtually all of the largest research animal programs in the United States, whereas the non-AAALAC category contains few or none of these. The comparison of these grossly unequal data sets is likely a very significant confounding factor.

The problems associated with the use of qualitatively and quantitatively flawed NCIs illustrate an important bold line of demarcation for the confidential, expert, collegial peer-review accreditation process used by AAALAC International from the annual regulatory inspection process used by the USDA AC system. The AAALAC peer-review process is comprehensive and performance-based. It involves the comprehensive, careful evaluation and documentation of findings and factors impacting nonhuman animal comfort, health, and welfare, influencing
workplace safety, and improving the value of scientific data. The AAALAC accreditation ensures appropriate conditions for all vertebrate species of institutional animal care and use programs, including the vast majority of those in most animal care and use programs who are not considered by the USDA Animal Welfare Act Regulations.

The AAALAC issues clear findings and identifies requirements for changes that are commensurate with the nature, context, and gravity of the problem area(s) that are identified in programs during site visit assessments and are affirmed through a thorough and thoughtful deliberative process involving the AAALAC Council on Accreditation. Consistency efforts and continuing education are hallmarks of the Council’s careful preparation for rendering valid, balanced, and effective judgments. The AAALAC International requires its accredited programs to adhere to the applicable laws and regulations governing research animal care and use that apply in the program’s country or region of operation. Regulatory findings are reviewed in detail and context by AAALAC site visitors as part of AAALAC’s performance-based accreditation process. Programs encountering difficulties in maintaining high standards are placed on probational status and continue to work under the AAALAC’s guidance on improvement or they are removed from the accreditation program. We believe the commitment that programs make to continue to strive for high standards under AAALAC accreditation is a valuable organizing principle in participating institutions and a meaningful statement of their support for animal welfare.

REFERENCE