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FASEB President Comments on Proposed Amendment to the Animal Welfare Act Regarding Medical Records

Bethesda, Md. – In a [letter](#) addressed to the Animal and Plant Health Inspection Service (APHIS), FASEB President Dr. Steven Teitelbaum expressed concern over a proposal to substantially increase the record keeping requirements for research animals covered by the Animal Welfare Act. In response to a call for comments posted in the April 11, 2003 Federal Register (Vol. 68, No. 70), FASEB concurred with the detailed analyses prepared by the [American Physiology Society \(APS\)](#) and the [National Association for Biomedical Research \(NABR\)](#). As stated in the letter, APHIS already requires animal health records under Policy #3 of the Animal Care Resource Guide. The proposed rule would impose rigid guidelines on what the medical records must contain and the format in which they must be kept. While Dr. Teitelbaum applauded APHIS efforts to “ensure the humane treatment of animals used in research,” and reiterated FASEB’s commitment to this principle, he cautioned “that the content of animal medical records is best left to the discretion of the attending veterinarian, in accordance with standard veterinary practice.”

Although emphasizing FASEB’s belief that adequate veterinary care is “an important component of laboratory animal care,” Dr. Teitelbaum questioned whether APHIS’s stated objective to use animal medical records as “a means of communication concerning the care being provided to animals” and “a basis for the [APHIS] to better assess the veterinary care programs of research facilities” was realistic. He pointed out that even detailed medical records are “only a small part of veterinary care” and further stated “that the current proposal merely imposes strict and burdensome policies that would limit the ability of the institutions’ veterinarians to oversee veterinary care.” The letter also highlighted specific, untenable requirements in the proposed rule, including those to list drug sensitivities of animals, of which currently, according to the FASEB President, “there exists no sound scientific” for evaluation.

FASEB is comprised of 22 societies with more than 60,000 members, making it the largest coalition of biomedical research associations in the United States. FASEB’s mission is to enhance the ability of biomedical and life scientists to improve—through their research—the health, well-being and productivity of all people. FASEB serves the interests of these scientists in those areas related to public policy, facilitates coalition activities among Member Societies and disseminates information on biological research through scientific conferences and publications.