

## Animal Welfare Bill Hidden Costs Could Be \$100,000 For Each Institution

The question as to the financial impact the "Humane Care and Substitutes for Animals in Research Act" would have on the nation's academic institutions has focused largely on the cost for accreditation. In the aggregate, this in itself is a staggering expense that has been estimated by the National Institutes of Health (NIH) to be at least \$500,000,000 for those institutions that are not in compliance with the standards of the American Association for Accreditation of Laboratory Animal Care (AAALAC) and are now receiving NIH support funds.

However, the one major cost factor that has been ignored by the Congress and to a great extent by the research and educational institutions is the expense every institution will have to bear to administer this law should it be enacted in its present form. Current estimates are that the administration of this act could cost every research institution an average of \$100,000 annually over each of the next 10 years, the proposed life of the bill.

Although the Congress originally authorized an appropriation of funds to assist in meeting some of the expense for institutions to attain accreditation status, this provision was deleted in later versions of the bill because of pressures from the Administration opposing any new expenditures of Federal funds. Also deleted from earlier versions of the bill were funds earmarked specifically for the development of alternative methods.

To offset these two proposed appropriations the Congress amended the current bill so that the development of alternative methods would have to compete head-to-head with other research grant requests (with no option for second-chance funding as proposed by the House Subcommittee on Science, Research, and Technology) and so that institutions would be given a 10-year period of time to attain compliance with standards for accreditation.

But the cost of administer the requirements stipulated in HR 6928 (formerly HR 6245) have been ignored by the House Committee on Science and Research, which reported the bill favorably with only three dissenting votes, and the House Committee on Energy and Commerce and its Subcommittee on Health and the Environment, which also considered the bill.

As a result, it is assumed that each institution will have to pay for these administrative expenses from the existing funds allocated for research.

Perhaps the largest single expense is the cost of administering the Institutional Animal Studies Committee. This cost includes the possibility of honoraria for a consulting veterinarian (if one is not on staff) and for an outside member to serve on the committee; the expense for at least two inspections annually of all facilities and animal study areas; the review of all animal research in

progress for compliance with stated methodologies and practices; and the overhead and clerical costs for preparing reports, maintaining records, and conducting regularly scheduled meetings of the committee.

Although these costs will vary widely depending on the size of the institution, it has been estimated that the average annual expense to the institution could be approximately \$50,000.

A second major expense to the institution is the requirement that educational courses and programs will be conducted for scientists, animal technicians, and other personnel involved in animal care, treatment, and use. Such continuing education programs are to be held at least annually and will include instruction and training in 1) the humane practice of animal maintenance and experimentation and 2) the concept, availability, and use of research and testing methods that minimize the use of animals or limit distress.

Again, these costs will vary widely depending on the size of the institution. However, it is estimated that the average annual expense for conducting such programs could be as much as \$30,000.

The third area of expense to the institution is in the administration of providing Federal agencies with "assurances" prior to the review of any grant proposal 1) that a consulting doctor of veterinary medicine has been employed in the planning of the procedures involving the use of animals; 2) that justification for anticipated animals distress in terms of the benefits of the research is assured; 3) that proper use of tranquilizers, analgesics, anesthetics, and paralytics are provided; 4) that appropriate pre- and postsurgical medical and nursing care is assured the animals; and 5) that the withholding of tranquilizers, anesthesia, analgesia, or euthanasia is a scientific necessity and done for only the necessary period of time.

The preparation for such planning and the reports required in the preparation of grant applications could add as much as an additional \$20,000 annually.

Using the conservation figure that 300 physiology departments could be affected by this bill, the total annual cost would be \$30,000,000. For all the research institutions that would be affected the total annual cost has been estimated by NIH to be \$65,000,000 and 1,300 additional staff would be needed just to meet the reporting requirements of the bill. NIH has also stated that an additional \$250,000 would be required annually to fulfill its obligations regarding this legislation.

When the institutional administration costs are coupled with the costs of meeting the accreditation requirements the total expense to the nation's academic research centers over the 10-year life-span of the bill is projected to be \$1,150,000,000.

Although the American Physiological Society is on record supporting the humane treatment of laboratory animals, the Society does not condone legislative regulations that unduly increase the burdens of the research as well as the burdens of costs that must be borne solely at institutional expense. Furthermore, it is unrealistic for the Congress to place these burdens on research and educational institutions at the time when the Administration itself is seeking deregulation and when