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Steven W. Cheung  
Chair, Assembly of the  
Academic Senate  
Faculty Representative,  
UC Board of Regents  
Academic Senate

Office of the President  
1111 Franklin Street  
Oakland, CA 94607

[senate.universityofcalifornia.edu](https://senate.universityofcalifornia.edu)

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CAMPUSES

Berkeley  
Davis  
Irvine  
UCLA  
Merced  
Riverside  
San Diego  
San Francisco  
Santa Barbara  
Santa Cruz

MEDICAL CENTERS

Davis  
Irvine  
UCLA  
San Diego  
San Francisco

NATIONAL LABORATORIES

Lawrence Berkeley  
Lawrence Livermore  
Los Alamos

March 6, 2025

Theresa Maldonado  
Vice President, Research & Innovation

Re: Systemwide Senate Review of Presidential Policy on the Use of Animals  
in Research, Teaching, and Testing

Dear Vice President Maldonado,

As requested, I distributed for systemwide Academic Senate review the draft *Presidential Policy on the Use of Animals in Research, Teaching, and Testing*. Nine Academic Senate divisions and two systemwide committees ([UCPB](#) and [UCORP](#)) submitted comments. These were discussed at the Academic Council's February 26, 2025 meeting, and the compiled feedback is attached for your reference.

The proposed revisions update the current *Presidential Policy on the Use of Animals in Research and Teaching*, reaffirming UC's commitment to the humane and responsible use of animals in research, teaching, and testing. The policy also incorporates considerations for wildlife and agricultural animals, establishes minimum standards for campus Animal Care and Use Programs, and updates references to applicable laws and regulations.

Overall, the Senate supports the policy's intent to enhance animal welfare protections, clarify roles and responsibilities in animal care and use, and ensure compliance with regulatory standards. Reviewers appreciated the increased clarity in the revised policy and its reinforcement of UC's commitment to ethical animal research and teaching.

At the same time, reviewers raised several concerns related to policy clarity, oversight, and implementation, and emphasized the need for flexibility to avoid unintended disruptions. Below is a summary of the key themes and recommendations.

### Policy Scope and Ethical Considerations

- Berkeley raised concerns about the broad phrasing of "for the good of society" as a justification for animal research, recommending more specific language and clearer ethical guidelines to prevent misuse. They suggested balancing societal benefits with ethical considerations and

establishing a clear framework to ensure animal use remains justified and responsible.

- Davis and UCPB recommended that the definitions of “animal” and “animal activities” be revised to exclude privately owned animals not used for federally funded research, particularly considering the complexities of veterinary programs. Otherwise, the overly broad definitions could increase regulatory costs, particularly for campuses with large veterinary programs.
- UCLA suggested clarifying the distinction and priority between research, teaching, and testing in the policy.

### **Oversight, Accreditation, and Transparency**

- UCSF raised concerns about the policy’s sole reliance on American Association for Accreditation of Laboratory Animal Care (AAALAC) accreditation, recommending that alternative accrediting bodies be allowed in order to prevent disruptions to research in case of accreditation issues.
- Berkeley highlighted the lack of transparency regarding Institutional Animal Care and Use Committee (IACUC) membership and emphasized the importance of including diverse perspectives from bioethics, animal law, and environmental science to ensure well-rounded oversight.
- UC Merced sought clarification on who is responsible for assessing Attending Veterinarians’ (AV) qualifications, recommending that IACUC be given this oversight role.

### **Administrative and Implementation Concerns**

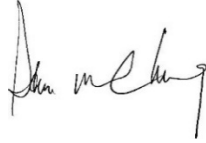
- Davis and UCPB questioned the necessity of a systemwide policy, arguing that campuses already have established procedures and that an additional layer of oversight could create bureaucratic conflicts.
- Irvine emphasized the need for greater faculty input from those directly impacted by the policy to ensure practical implementation.
- UCSF requested clarification on whether the policy applies to UC affiliate sites, volunteers, and visiting scholars.

### **Terminology and Scientific Standards**

- Davis recommends modernizing language, replacing “lower animal species” with “alternative animal models” and reordering the 3Rs. (Replacement, Reduction, Refinement) to reflect standard scientific usage.
- Several reviewers requested a clearer distinction between “research” and “testing” in the policy.
- Multiple campuses sought clarification on how the policy applies to animals used in food production, invertebrates, and the handling of animal remains.
- UCLA suggested explicitly addressing ecological and environmental impacts in the policy’s justification for animal use.

Thank you for the opportunity to opine. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven W. Cheung". The signature is fluid and cursive, with the first name "Steven" and last name "Cheung" clearly distinguishable.

Steven W. Cheung  
Chair, Academic Council

cc: Academic Council  
Research Policy Manager Alexander  
Senate Division Executive Directors  
Senate Executive Director Lin



320 STEPHENS HALL  
UNIVERSITY OF CALIFORNIA

February 12, 2025

STEVEN CHEUNG  
Chair, Academic Senate

*Subject: Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing*

Dear Chair Cheung,

On January 27, 2025, the Divisional Council (DIVCO), the executive body of the Berkeley Division of the Academic Senate, discussed the proposed Presidential policy on the *Use of Animals in Research, Teaching, and Testing*. Discussion was informed by written comments from the Committee on Research (COR).

DIVCO appreciated the goal of updating the policy to enhance protections for animals used in research, teaching and testing. DIVCO raised two primary concerns with the revised policy language. The first concern has to do with the phrase “or for the good of society” on page 3. Specifically, section III.1 states:

*“Procedures involving Animals may only be conducted when they will contribute to the advancement of knowledge that is likely to lead to the improvement of animal or human health and welfare, a greater understanding of biological processes, the animals themselves, human health, or for the good of society.”*

Allowing animals to be used for the “good of society” without clear restrictions raised concerns about potential misuse. This broad phrasing seems to allow a wide range of justifications for animal use that could lack adequate ethical boundaries or oversight. To address this, we suggest incorporating more specific language that balances the societal benefits with ethical considerations and a clear framework for when animal research is warranted. Balancing such language with a clear ethical framework would help ensure that use of animals remains responsible and justifiable in all cases.

Additionally, DIVCO discussed the lack of transparency regarding the members of the Institutional Animal Care and Use Committee (IACUC). DIVCO members understand that members' identifications may be protected for safety reasons. Notwithstanding, members discussed the importance of having a diversity of perspectives represented on the committee. Although there is language stating that "IACUC membership consists of UC faculty from various scientific disciplines experienced in research involving Animals...", there is no clear indication of whether the committee includes experts from other relevant fields, such as legal scholars or ethicists, who would provide important perspectives on animal research beyond the scientific and veterinary aspects. The inclusion of professionals from fields such as animal law, bioethics, and environmental science would ensure a broader range of ethical, legal, and societal viewpoints – and a more balanced approach to use of animals in research, teaching, and testing.

Thank you for the opportunity to review and comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Amani Nuru-Jeter". The signature is fluid and cursive, with the first name being the most prominent.

Amani Nuru-Jeter  
Chair, Berkeley Division of the Academic Senate

Enclosure

cc: Mark Stacey, Vice Chair, Berkeley Division of the Academic Senate  
Jocelyn Surla Banaria, Executive Director, Berkeley Division of the Academic Senate  
Abby Dernburg, Committee on Research  
Patrick Allen, Academic Senate Analyst, Committee on Research



320 STEPHENS HALL  
UNIVERSITY OF CALIFORNIA

January 23, 2025

CHAIR AMANI NURU-JETER  
Academic Senate

*Re: Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing*

Dear Chair Nuru-Jeter,

At its January 16, 2025, meeting, the Committee on Research (COR) reviewed and discussed the proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing. The revisions address considerations for wildlife and agricultural animals, set minimum procedures for an effective Animal Care and Use Program across campuses, and update the list of relevant laws and regulations to ensure the health and safety of animals. These changes will enhance ethical and humane treatment of animals at UC.

Overall, the Committee endorses the revisions, reinforcing UC's commitment to the humane use of animals in research, teaching, and testing.

We appreciate the opportunity to provide our perspective.

Regards,

A handwritten signature in cursive script that reads 'Abby Dernburg'.

Abby Dernburg, Chair  
Committee on Research

AD/pgs



DAVIS DIVISION OF THE ACADEMIC SENATE  
ONE SHIELDS AVENUE  
DAVIS, CALIFORNIA 95616-8502  
(530) 752-2220  
academicsenate.ucdavis.edu

February 18, 2025

**Steven Cheung**  
Chair, Academic Council

**RE:** Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing

The proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing was forwarded to all standing committees of the Davis Division of the Academic Senate. Eight committees responded: Faculty Welfare (FWC), Research (COR), Planning and Budget (CPB), and the Faculty Executive Committees of the College of Agricultural and Environmental Sciences (CAES), the College of Engineering (COE), the College of Letters and Sciences (L&S), the School of Medicine (SOM), the School of Veterinary Medicine (SVM).

FWC and COR provide a few recommendations for consideration, while CPB expresses concern about the proposed policy. FWC notes that the use of the phrase “lower animal species,” is old-fashioned and a more contemporary usage would be “alternative animal models.” COR provides two additional recommendations to consider. First, the 3Rs are typically discussed in a specific order: Replacement, Reduction, and Refinement; COR recommends that the document be corrected to that order. Second, COR recommends clarifying the difference between “Testing” and “Research,” and wonders whether animals used for breeding or milk, meat production, and slaughter are included in this policy.

CPB expresses concern that the policy contains overly broad definitions that will increase regulatory costs, particularly for the UC Davis animal care program and the IACUC. CPB and COR recommend that the definition of animal and animal activities should exclude privately-owned animals that are not used for federally funded research, especially given the contextual complexities of a campus with a large veterinary hospital. COR suggests adding the following language to the definition of animal activities: “This policy excludes privately owned animals.”

Lastly, I would like to emphasize CPB’s argument that all campuses participating in animal research already have SOPs for their IACUC and animal research programs, meaning a new systemwide policy is superfluous and risks future bureaucratic conflicts. As CPB states: “A second, systemwide SOP unnecessarily reduces local program flexibility and increases the chance that dissonance between local and systemwide policies occurs over time.” CPB suggests using the following statement as a substitute for an overarching policy for the use of animals in research:

“The University of California requires that all of its owned or managed facilities that participate in vertebrate animal research develop an animal care program and institutional animal care and

use committee in accordance with all applicable local, state, and federal laws and regulations. Each UC location must hold an active PHS Animal Welfare Assurance with NIH/OLAW and a registration with USDA-Animal and Plant Health Inspection Service (if applicable) and maintain accreditation from AAALAC International.”

The Davis Division appreciates the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katheryn Niles Russ'.

Katheryn Niles Russ, Ph.D.  
Chair, Davis Division of the Academic Senate  
Professor of Economics  
University of California, Davis

Enclosed: Davis Division Committee Responses

c: Monica Lin, Executive Director, Systemwide Academic Senate  
Michael LaBriola, Assistant Director, Systemwide Academic Senate  
Edwin M. Arevalo, Executive Director, Davis Division of the Academic Senate



January 31, 2025

**Katheryn Russ**

Chair, Davis Division of the Academic Senate

**RE: RFC: Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing**

The Committee on Planning and Budget (CPB) has reviewed the **RFC: Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing** and has identified the following two concerns with the proposed policy:

1. Overly broad definitions will increase regulatory costs.

“Animal: as defined by federal regulations and accrediting bodies, is any live vertebrate animal (including laboratory, wildlife, and agricultural animals), used or intended for use in research, teaching, and/or testing...” (page 2)

“Animal Activities: for the purpose of this policy, any activity that involves the use of Animals for research, testing, and teaching.” (page 2)

Both definitions should exclude privately-owned animals that are not used for federally funded research. Although the UC Davis animal care program will require review by a clinical trials review board or a peer-review subcommittee of the IACUC, these animals are not legally required to be part of the animal care program. Unnecessarily doing so subjects the IACUC and animal care program to increased costs associated with housing and study area inspections that may be remote from the campus and as well as to liability for oversight of facilities for which University officials have no jurisdiction (such as feedlots or private homes or non-UC animal clinics). IACUC oversight over protocols for which there is no such requirement places increased demands on IACUC staff time and resources that should be directed towards the needs of protocols and facilities that require oversight.

2. Policy is superfluous and risks future bureaucratic conflicts

All campuses participating in animal research already have SOPs for their IACUC and animal research program. A second systemwide SOP that overlays campus SOPs unnecessarily reduces local program flexibility and increases the chance that dissonance between local and systemwide policies occurs over time.

If UCOP needs to have an overarching policy for the use of animals in research, why wouldn't the following two sentence statement suffice:

“The University of California requires that all of its owned or managed facilities that participate in vertebrate animal research develop an animal care program and institutional animal care and use committee in accordance with all applicable local, state, and federal laws and regulations. Each UC location must hold an active PHS Animal Welfare Assurance with NIH/OLAW and a registration with USDA-Animal and Plant Health Inspection Service (if applicable) and maintain accreditation from AAALAC International.”

CPB appreciates the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Robert Brosnan." The signature is written in a cursive style with a period at the end.

Robert Brosnan  
Chair, Committee on Planning and Budget

February 13, 2025

**Kadee Russ**

Chair, Davis Division of the Academic Senate

**RE:** Request for Consultation on the Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing

Dear Kadee:

The Committee on Research (COR) has reviewed the Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing. The COR would like to note the following:

- The 3Rs are typically discussed in a specific order which is: Replacement, Reduction and Refinement. COR recommends that the document be corrected to that order.
- The update title shows that animals used in “Testing” are included in the revised policy. The committee is not sure how “Testing” is differentiated from “Research” and would like to know if animals used for breeding or milk / meat production / slaughter are included (assuming this is done at UCD). This is not obvious. It’s interesting to observe that this policy gives no animal care specifics but instead refers to external documents.

The Committee on Research (COR) notes that the revised policy, as proposed, could be interpreted to require all animal activities to undergo Institutional Animal Care and Use Committee (IACUC) review and oversight. However, UC Davis stands out within the University of California system due to its unique set of animal-related activities associated with the School of Veterinary Medicine's clinical care and teaching. In these cases, client-owned animals are treated by students, faculty, and staff based on the clinical needs of the animals. Therefore, IACUC review and monitoring may not be appropriate in these situations. The COR recommends the following:

- Under definitions, Animal Activities the COR recommends that we add “This policy excludes privately owned animals” to make it clear client-owned animals are not covered.
- Under IV. Compliance / Responsibilities: COR recommends that “The IACUC also is responsible for determining applicability of this policy” be added and that the following: to “research conducted by UC personnel with non-UC-owned animals or at non-UC institutions.”

Sincerely,



David M. Roche

Chair, Committee on Research

February 7, 2025

**Katheryn Russ**

Chair, Davis Division of the Academic Senate

**RE:** Request for Consultation – Proposed Presidential Policy: Use of Animals in Research, Teaching, and Testing

Dear Chair Russ:

The Committee on Faculty Welfare has reviewed the RFC – Proposed Presidential Policy: Use of Animals in Research, Teaching, and Testing. In general, the committee did not see a substantial impact on faculty welfare. One member did note that the use of the phrase "lower animal species" is old-fashioned, and a more contemporary usage would be "alternative animal models".

Sincerely,

A handwritten signature in black ink, appearing to read "Janet Foley". The signature is fluid and cursive, with the first name being more prominent.

Janet Foley

Chair, Committee on Faculty Welfare

January 21, 2025

To: Katheryn Russ  
Chair, Davis Division of the Academic Senate

From: Michael Kleeman  
Chair, College of Engineering FEC

RE: Comment on Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing

Dear Chair Russ:

The College of Engineering FEC has reviewed the proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing. The committee notes that the proposed policy has few substantial changes other than to expand the definition of animals to include wildlife and farm animals. The COE FEC has no comment on the proposal at this time.

Thank you for the opportunity to comment on this proposed policy.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Kleeman", followed by a horizontal line.

Michael Kleeman

Chair, COE FEC

# **Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing**

**FEC: College of Letters and Science Committee Response**

**February 13, 2025**

The L&S FEC has reviewed the Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing and has no further comments.

# **Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing**

## **FEC: School of Medicine Committee Response**

**February 13, 2025**

The SOM FEC reviewed this item on 1/22 and are in support of the updates.

# **Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing**

## **FEC: College of Agricultural and Environmental Sciences Committee Response**

**February 13, 2025**

The CA&ES Faculty Executive Committee supports this policy.



# **Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing**

## **FEC: School of Veterinary Medicine Committee Response**

**February 13, 2025**

The School of Veterinary Medicine FEC has reviewed the revised the proposed Presidential Policy for Use of Animals in Research, Teaching, and Testing , and has no further comments.

**February 6, 2025**

**Steven Cheung, Chair  
Academic Council**

**Re: Proposed Presidential Policy on Use of Animals in Research, Teaching, and Testing**

The Irvine Division Cabinet discussed the proposed Presidential Policy on Use of Animals in Research, Teaching, and Testing at its meeting on February 4, 2025. The Council on Research, Computing, and Libraries (CORCL) and the Council on Teaching, Learning, and Student Experience (CTLSE) reviewed the proposal. The councils' feedback is attached for your review.

Both CORCL and CTLSE reported that their current membership has limited experience working with animals in research, teaching, and testing. While the Cabinet acknowledged that the policy revisions reflected substantial input from UC Legal and campus Animal Care and Use Program administrators and Attending Veterinarians, members recommended that UCOP ensure perspectives of faculty directly impacted by the policy are incorporated, soliciting feedback as needed via Vice Chancellors for Research, or their equivalent, at the campuses.

The Irvine Division appreciates the opportunity to comment.

Sincerely,



Valerie Jenness, Chair  
Academic Senate, Irvine Division

Cc: Jane Stoever, Chair Elect-Secretary  
Jisoo Kim, Executive Director  
Gina Anzivino, Associate Director



January 29, 2025

**VALERIE JENNESS, CHAIR  
ACADEMIC SENATE, IRVINE DIVISION**

**RE: Presidential Policy on Use of Animals in Research, Teaching, and Testing**

At its January 23, 2025 meeting, the Council on Research, Computing, and Libraries (CORCL) discussed the proposed Presidential Policy on Use of Animals in Research, Teaching, and Testing.

Overall, the Council found the proposed policy to be reasonable. The policy outlines core principles, describes essential regulatory compliance requirements, and establishes animal care, use, and welfare roles and responsibilities.

Members made two minor observations:

1. Prior policy appeared to allow some lacks in accreditation as long as accreditation has been applied for. It is unclear whether this allowance is in the new policy.
2. Some members wondered if obtaining “PHS Animal Welfare Assurance with NIH/OLAW and a registration with USDA-Animal and Plant Health Inspection Service (APHIS) (if applicable), and maintain[ing] accreditation from AAALAC International, a voluntary accreditation organization that evaluates institutional Animal Care and Use Programs according to standards described in the Guide” is reasonable.

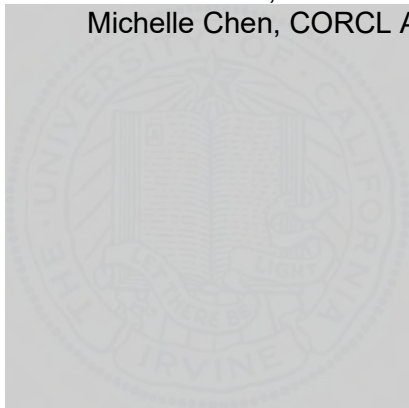
CORCL noted that its current membership has limited experience working with animals in teaching and research and advises that faculty more directly impacted by this policy should be given an opportunity to provide feedback.

On behalf of the Council,



James Weatherall, Chair

c: Jisoo Kim, Executive Director  
Gina Anzivino, Assistant Director  
Michelle Chen, CORCL Analyst



January 21, 2025

**VALERIE JENNESS, CHAIR  
ACADEMIC SENATE – IRVINE DIVISION**

**Re: Systemwide Proposed Presidential Policy on Use of Animals in Research,  
Teaching, and Testing**

Academic Council Chair Cheung has distributed for systemwide review a proposed Presidential Policy on Use of Animals in Research, Teaching, and Testing.

The Council on Teaching, Learning, and Student Experience (CTLSE) discussed this issue electronically. Members generally had no issue with the revisions. A member commented that they seemed to provide streamlining and site-level flexibility to improve the Institutional Animal Care and Use Committee (IACUC) processes across Systemwide UC. Another member asked the following: Is there a list or report available to the campus community of the research being done, what type of animals are being used, how many, and how they are procured?

The Council appreciates the opportunity to provide input.

Sincerely,



Sergio Gago-Masague, Chair  
Council on Teaching, Learning, and Student Experience

C:

Julie Kennedy, CTLSE Analyst  
Academic Senate

Jisoo Kim, Executive Director  
Academic Senate

Gina Anzivino, Associate Director  
Academic Senate



January 30, 2025

Steven Cheung  
Chair, UC Academic Senate

**Re: (Systemwide Senate Review) Proposed Presidential Policy-Use of Animals in Research, Teaching, and Testing**

Dear Chair Cheung,

The divisional Executive Board (EB) reviewed the proposed presidential policy on the use of animals in research, teaching, and testing, and divisional council feedback at its meeting on January 30, 2025. Members voted in favor of a motion to endorse the proposed policy.

Members encouraged a close reading of the letters from the Council on Research and the Council on Planning and Budget. They also suggested clarity on how the inclusion of environmental impacts fit within the policy.

Thank you for the opportunity to advise on this matter.

Sincerely,



Kathleen Bawn  
Chair  
UCLA Academic Senate

Encl.

Cc: April de Stefano, Executive Director, UCLA Academic Senate  
Andrea Kasko, Immediate Past Chair, UCLA Academic Senate  
Megan McEvoy, Vice Chair/Chair Elect, UCLA Academic Senate

January 28, 2025

Kathleen Bawn, Chair  
Academic Senate

**Re: (Systemwide Senate Review) Proposed Presidential Policy-Use of Animals in Research, Teaching, and Testing**

Dear Chair Bawn,

The Council on Research (COR) reviewed and discussed the Proposed Presidential Policy-Use of Animals in Research, Teaching, and Testing via email. Members offered the following comments.

The policy would benefit from further clarification on the priority order of activities, Research, Teaching, Testing, and the resources listed at the end. See section II. Definitions, and the policy title on page 1 of the revised policy document with tracked changes. Members also noted that the language in Section IV, Compliance/Responsibilities, is unclear regarding roles and should be more specific. It lists three officers: “Chancellor, Vice President of Agricultural and Natural Resources, and National Laboratory Director: Serves as the UC Location’s Chief Executive Officer (CEO) and is ultimately responsible for the UC Location’s Program as per The Health Research Extension Act, the PHS Policy, and the AWA/AWR.” Is this one person, or multiple people, in which case should this be plural rather than singular?

If you have any questions for us, please do not hesitate to contact me at [dlettenm@geog.ucla.edu](mailto:dlettenm@geog.ucla.edu) or via the Council’s analyst, Elizabeth Feller, at [efeller@senate.ucla.edu](mailto:efeller@senate.ucla.edu).

Sincerely,

Dennis Lettenmaier, Chair  
Council on Research

cc: Megan McEvoy, Vice Chair/Chair-Elect, Academic Senate  
Andrea Kasko, Immediate Past Chair, Academic Senate  
April de Stefano, Executive Director, Academic Senate  
Elizabeth Feller, Associate Director, Academic Senate  
Members of the Council on Research

January 28, 2025

Kathleen Bawn, Chair  
Academic Senate

**Re: Systemwide Senate Review: Proposed Presidential Policy-Use of Animals in Research,  
Teaching, and Testing**

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Dear Chair Bawn,

At its meeting on January 27, 2025, the Council on Planning and Budget (CPB) reviewed and discussed the Proposed Presidential Policy-Use of Animals in Research, Teaching, and Testing. Members offered the following comments.

Members were in support of the revision to the policy, which had not been updated since 1984. Members noted the potential for small financial burdens in the form of added time inputs for compliance. One member also was concerned that the language of the policy fails to include environmental and ecological issues and suggested different language for the policy text (section III), as follows.

Current revisions:

“1. Procedures involving Animals may only be conducted when they will contribute to the advancement of knowledge that is likely to lead to the improvement of animal or human health and welfare, a greater understanding of biological processes, the animals themselves, human health, or for the good of society”

Proposed:

“1. Procedures involving Animals may only be conducted when they will contribute to the advancement of knowledge that is likely to lead to the improvement of animal or human health and welfare, a greater understanding of biological **and ecological** processes, the animals themselves, human health (redundant), or for the good of society and our **environment.**”

If you have any questions for us, please do not hesitate to contact me at [smith@anthro.ucla.edu](mailto:smith@anthro.ucla.edu) or via the Council’s analyst, Elizabeth Feller, at [efeller@senate.ucla.edu](mailto:efeller@senate.ucla.edu).

Best regards,



Monica Smith, Chair  
Council on Planning and Budget

cc: Megan McEvoy, Vice Chair/Chair-Elect, Academic Senate  
Andrea Kasko, Immediate Past Chair, Academic Senate  
April de Stefano, Executive Director, Academic Senate  
Elizabeth Feller, Associate Director, Academic Senate  
Members of the Council on Planning and Budget



3125 Murphy Hall  
410 Charles E. Young Drive East  
Los Angeles, California 90095

January 24, 2025

To: Kathleen Bawn, Chair, UCLA Academic Senate

From: Deepak Rajagopal, Chair, Graduate Council

**Re: Systemwide Senate Review: Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing**

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At its meeting on January 17, 2025, the Graduate Council reviewed and discussed the proposed *Presidential Policy – Use of Animals in Research, Teaching, and Testing* and offered the following for the Executive Board's consideration.

While the majority of the Council observed that they did not have the knowledge and expertise to comment on the specifics of the policy, Council members support having a policy that establishes a minimum set of standards and procedures that all campuses must comply with.

We appreciate the opportunity to express our views on this matter. If you have any questions, please contact us via Graduate Council Analyst, Emily Le, at [ele@senate.ucla.edu](mailto:ele@senate.ucla.edu).



**OFFICE OF THE ACADEMIC SENATE**

Kevin Mitchell, Chair of the Academic Senate

[senatechair@ucmerced.edu](mailto:senatechair@ucmerced.edu)

UNIVERSITY OF CALIFORNIA, MERCED

5200 North Lake Road

Merced, California 95343

**February 14, 2025**

**To: Steven Cheung, Chair, Academic Council**

**From: Kevin Mitchell, Chair, UCM Divisional Council (DivCo)**

**Re: [Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing PDF](#)**

The proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing was distributed to the Merced Division Senate Committees and School Executive Committees. The following committees offered several comments for consideration. Their comments are appended to this memo.

- Committee on Research (CoR)
- Committee on Faculty Welfare and Academic Freedom (FWAF)
- Graduate Council (GC)
- Undergraduate Council (UGC)

**CoR** finds the proposed policy comprehensive and aligned with current laws and federal guidelines. However, CoR highlights a concern regarding the responsibilities of Attending Veterinarians (AVs). Specifically, CoR seeks clarification on who will assess and address concerns about an AV's qualifications or veterinary care. CoR recommends that the local Institutional Animal Care and Use Committee (IACUC) take on this role due to its oversight responsibilities and expertise in animal programs.

**FWAF** seeks clarification on various aspects of the policy:

- Section II-Definitions
  - i. Animal: The regulations primarily apply to live vertebrates but may also cover live invertebrates under certain federal regulations. FWAF recommends clearly stating these exceptions or providing a link to a webpage listing the relevant regulations.
  - ii. 3Rs, Replacement: FWAF doubts that substituting with lower animal species is scientifically valid in most cases and seeks clarification on acceptable non-animal alternatives.
- Section III. Policy Text
  - i. Item 2.b: FWAF seeks clarification on the IACUC's operational timescale and measures to prevent bureaucratic delays that could hinder research efficiency. Ensuring clear safeguards would support effective policy implementation.

**GC** finds the revisions enhance clarity, align with regulatory standards, and reinforce UC's commitment to ethical animal use in research and teaching. The Policy broadens its scope, clarifies definitions, and

strengthens compliance and oversight. GC endorses the policy but emphasizes the need for effective implementation through campus-specific procedures and stakeholder engagement at UC Merced.

**UGC** supports the proposed policy, noting its improved clarity, structure, and alignment with ethical standards. The inclusion of the 3Rs principles enhances guidance on responsible animal use. UGC also emphasizes the policy's applicability across all UC campuses, including UC Merced, and its role in modeling good practices for undergraduates.

DivCo endorses the policy and supports the committees' various points and suggestions.

We thank you for the opportunity to review this policy.

Cc: DivCo Members  
School Executive Committee Chairs  
UCM Senate Office  
Monica Lin, Executive Director, Systemwide Senate Office  
Michael LaBriola, Assistant Director, Systemwide Senate Office

# UNIVERSITY OF CALIFORNIA, MERCED

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BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO



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SANTA BARBARA • SANTA CRUZ

ACADEMIC SENATE, MERCED DIVISION  
COMMITTEE ON RESEARCH (COR)  
TAO YE, CHAIR  
tye2@ucmerced.edu

UNIVERSITY OF CALIFORNIA, MERCED  
5200 NORTH LAKE ROAD  
MERCED, CA 95343

**January 27, 2025**

**To:** Kevin Mitchell, Senate Chair

**From:** Tao Ye, Chair, Committee on Research (CoR)

**Re:** Proposed Presidential Policy Use of Animals in Research, Teaching, and Testing

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The UC Presidential Policy on Use of Animals in Research, and Teaching, and Testing was revised recently by the RPAC unit in the UCOP with inputs from others, including attending veterinarians (AV) on UC campuses. The proposed policy is seen by this committee as comprehensive and aligning well with contemporary laws and federal recommendations. However, we would like to draw attention to the following item in the proposed policy for further consideration:

1. Regarding the responsibilities of AVs, the policy states in section IV, '*...has training in, and has Program authority and responsibility for, the health and wellbeing of all Animals used by the Location, and for the oversight of facilities, personnel, equipment, and services to monitor the health status of the Animals and **meet their species-specific needs.***'

If an animal user, IACUC member, or any pertinent individual questions the campus AV's expertise or the provision of adequate veterinary care [9 C.F.R. § 2.33(a)(2)], who will have the responsibility to assess such qualification, adjudicate on the complaint, and provide guidance on the way forward? We recommend, given their pervasive role in oversight and knowledge of animal programs, the local IACUC be given such responsibility.

We appreciate the opportunity to opine.

cc: Senate Office



ACADEMIC SENATE, MERCED DIVISION  
COMMITTEE ON FACULTY WELFARE AND ACADEMIC FREEDOM (FWAF)

UNIVERSITY OF CALIFORNIA, MERCED  
5200 NORTH LAKE ROAD  
MERCED, CA 95343

**January 28, 2025**

**To: Kevin Mitchell, Chair, Divisional Council**

**From: [Committee on Faculty Welfare and Academic Freedom \(FWAF\)](#)**

**Re: [Presidential Policy on the Use of Animals in Research, Teaching, and Testing](#)**

At the January 27, 2025 FWAF meeting, members reviewed the Presidential Policy on the Use of Animals in Research, Teaching, and Testing and offer the following comments.

The documents outline proposed revisions to the policy governing the health, safety, and ethical treatment of animals used in research, teaching, and testing. While FWAF recognizes the importance of these updates, the Committee seeks clarification on several points to ensure the revisions align with best practices and address concerns effectively:

## II. DEFINITIONS

- **Animal:** as defined by federal regulations and accrediting bodies, any live vertebrate animal (including laboratory, wildlife, and agricultural animals), used or intended for use in research, teaching, and/or testing. Additionally, federal regulations or accreditation requirements may apply to certain invertebrate animals (page 2).

The regulations apply to “live vertebrate”, but may also extend to “live invertebrates” under certain “federal regulations”. FWAF recommends explicitly stating the exceptions or regulations or providing a link to a general webpage with a list of the exceptions or regulations would suffice.

- **3Rs – Replacement:** avoiding the use of animals in an experiment where possible, and substituting with non-animal method (e.g., computer simulation) or lower animal species where appropriate (page 3).

FWAF believes that substituting with lower animal species may not be a scientifically acceptable substitute in most cases. Members wonder what other non-animal methods may be acceptable.

### III. POLICY TEXT

- **2.b.** All proposed Animal Activities must be reviewed by the IACUC (page 3).

Page 5 of the policy states, “IACUC: This independent committee is responsible for supporting and facilitating use of Animals by administering and upholding the standards set forth in the regulatory and guidance documents listed in Section IV.5. of this policy. Its primary functions are mandated by PHS Policy IV.B. and AWR 2.31(c). IACUCs at UC Locations may create and administer additional institutional policies or equivalent guidance documents to effectively administer that Location’s Program. The IACUC also has the discretion/ responsibilities for determining applicability of this policy to research conducted by UC personnel with non-UC-owned animals or at non-UC institution.”

FWAF raises questions about the operational timescale of the IACUC. Specifically, the safeguards or procedural measures that are in place to minimize the risk of bureaucratic delays that could impede research progress or create inefficiencies. Clarifying this point would help ensure the policy’s implementation remains both effective and practical.

FWAF appreciates the opportunity to provide feedback on the Presidential Policy on the Use of Animals in Research, Teaching, and Testing.

Cc: FWAF Members  
Senate Office



ACADEMIC SENATE, MERCED DIVISION  
GRADUATE COUNCIL (GC)

UNIVERSITY OF CALIFORNIA, MERCED

**January 24, 2025**

**To: Kevin Mitchell, Chair, Divisional Council**

**From: John Abatzoglou, Chair, Graduate Council (GC)**

**Re: [Presidential Policy on the Use of Animals in Research, Teaching, and Testing](#)**

At the January 24, 2025 Graduate Council (GC) meeting, voting members reviewed the Presidential Policy on the Use of Animals in Research, Teaching, and Testing and offer the following comments.

GC believes that the revisions provide improved clarity, align with updated regulatory and accreditation standards, and reaffirm the UC's commitment to the ethical and responsible use of animals in research and teaching. The Policy expands its scope to include non-UC participants in animal activities, clarifies key definitions, and ensures alignment with federal and international guidelines. Additionally, it delineates responsibilities for compliance and oversight, enhancing transparency and accountability.

GC believes the revised Policy represents a robust framework for maintaining high standards in the care and use of animals at the UC. Voting members recommend endorsing the Policy while ensuring effective implementation through campus-specific procedures and stakeholder engagement to address local considerations at UC Merced.

GC thanks you for the opportunity to review and comment.

Cc: Graduate Council  
Senate Office

# UNIVERSITY OF CALIFORNIA, MERCED

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO



SANTA BARBARA • SANTA CRUZ

ACADEMIC SENATE, MERCED DIVISION  
UNDERGRADUATE COUNCIL (UGC)

UNIVERSITY OF CALIFORNIA, MERCED

**January 23, 2025**

**To: Kevin Mitchell, Chair, Academic Senate**

**From: Jay Sharping, Chair, Undergraduate Council (UGC)**

**Re: [Presidential Policy on the Use of Animals in Research, Teaching, and Testing](#)**

At the January 23, 2025 Undergraduate Council (UGC) meeting, members reviewed the *Presidential Policy on the Use of Animals in Research, Teaching, and Testing* and offer the following comments.

Overall, UGC believes the proposed policy is an important update to the 2012 version that improves clarity, structure, and alignment with the latest ethical standards. The inclusion of the internationally accepted 3Rs principles (Reduction, Refinement, Replacement) provides accessible guidance for promoting responsible animal care and use. The policy applies to each UC campus, including UC Merced. UGC believes that recognition of and compliance with the policy would model good behavior wherever undergraduates are participating in research or coursework involving animals.

UGC is pleased to endorse the *Presidential Policy on the Use of Animals in Research, Teaching, and Testing* and appreciates the opportunity to review.

Cc: Senate Office  
UGC Members





CHAIR, ACADEMIC SENATE  
RIVERSIDE DIVISION  
UNIVERSITY OFFICE BUILDING, RM 225

Kenneth Barish  
PROFESSOR OF PHYSICS AND ASTRONOMY  
RIVERSIDE, CA 92521-0217  
TEL: (951) 827-5023  
EMAIL: kenneth.barish@ucr.edu

February 12, 2025

Steven Cheung, Chair, Academic Council  
1111 Franklin Street, 12th Floor  
Oakland, CA 94607-5200

**RE: Presidential Policy on the Use of Animals in Research, Teaching, and Testing**

Dear Steven,

The Riverside Executive Council discussed the proposed policy on February 10, 2025.

While most Divisional committees had no comments or concerns, the CHASS FEC noted the absence of language regarding the handling of animal remains. The CNAS FEC identified a potential ambiguity in the policy's definition of "animals," specifically concerning invertebrates, and requested clarification to ensure consistent interpretation and application of the policy.

Sincerely yours,

A handwritten signature in blue ink that reads "Kenneth Barish".

Kenneth Barish  
Professor of Physics and Astronomy and Chair of the Riverside Division

CC: Monica Lin, Executive Director of the Academic Senate  
Cherysa Cortez, Executive Director of UCR Academic Senate Office



**School of Business**  
Anderson Hall  
900 University Avenue  
Riverside, CA 92521

January 15, 2025

To: Ken Barish, Chair  
Riverside Division of the Academic Senate

From: Elodie Goodman  
Chair, School of Business Executive Committee

Re: Proposed Policy: *Presidential Policy on the Use of Animals in Research, Teaching, and Testing*

Please let this memo serve as an official notification that the School of Business Executive Committee supports the proposal and has no comments or concerns.



College of Humanities, Arts, and  
Social Sciences  
EXECUTIVE COMMITTEE

December 5, 2024

TO: Ken Barish, Chair  
Riverside Division of the Academic Senate

FROM: Wesley Leonard, Chair   
CHASS Executive Committee

RE: Proposed Policy: Presidential Policy on the Use of Animals in Research,  
Teaching, and Testing

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The CHASS Executive Committee reviewed the Proposed Policy: Presidential Policy on the Use of Animals in Research, Teaching, and Testing. The committee observed that the policy does not address animal remains, which the committee knows may concern certain constituencies. The committee has no additional comments.



January 16, 2025

TO: Kenneth N. Barish, Ph.D., Chair, Academic Senate, UCR Division

FROM: Harry Tom, Ph.D., Chair, Faculty Executive Committee, College of Natural and Agricultural Sciences

SUBJECT: [Systemwide Review] Proposed Policy: Presidential Policy on the Use of Animals in Research, Teaching, and Testing

During the CNAS Executive Committee meeting on January 7, faculty members raised concerns about potential ambiguity in the document's definition of "animals," particularly the following statement:

*"Additionally, federal regulations or accreditation requirements may apply to certain invertebrate animals."*

The placement and phrasing of this sentence have led to two possible interpretations:

- A.** Federally protected or regulated invertebrates (e.g., those under the Endangered Species Act) are considered "animals" under this document and are subject to its outlined rules.
- B.** This statement serves only to acknowledge that federally protected or regulated invertebrates may have additional requirements distinct from the scope of this document.

After consulting with faculty and departments, interpretation B seems accurate—the document acknowledges that federally protected or regulated invertebrates might fall under external guidelines but are not governed by the rules outlined here.

To ensure clarity and avoid future misunderstandings, we request confirmation that this interpretation aligns with the document's intent.

Sincerely,

A handwritten signature in black ink that reads "Harry Tom".

Harry Tom, Ph.D.  
Chair, Faculty Executive Committee College of Natural and Agricultural Sciences



*Academic Senate*

**Committee on Research**

January 23, 2025

To: Kenneth Barish, Chair  
Riverside Division

From: Rachel Wu, Chair  
Committee on Research

Re: 24-25. SR. Presidential Policy on the Use of Animals in Research, Teaching, and Testing

The committee on research reviewed the proposal and had no comments.



1/13/25

**To:** Kenneth Barish, Division Chair of the UCR Division of the Academic Senate and Cherysa Cortez, Executive Director of the UCR Academic Senate

**From:** Katherine Meltzoff, Ph.D., Faculty Chair of the School of Education Executive Committee

**Subject:** Systemwide Review of Proposed Presidential Policy Use of Animals in Research, Teaching, and Testing

The SOE Executive Committee reviewed the Systemwide Review of Proposed Presidential Policy Use of Animals in Research, Teaching, and Testing. Comments/feedback were solicited at our executive committee meeting and via email.

We do not have any comments or concerns.

Thank you for the opportunity to provide feedback.

Sincerely,

Katherine Meltzoff  
Faculty Executive Committee Chair  
School of Education  
University of California, Riverside

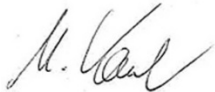
December 20, 2024

TO: Ken Barish, PhD, Chair, Academic Senate, UCR Division  
FROM: Marcus Kaul, Ph.D., Chair, Faculty Executive Committee, UCR School of Medicine  
SUBJECT: [Systemwide Review] (Proposed Policy) Presidential Policy on the Use of Animals in Research, Teaching, and Testing

Dear Ken,

The SOM Faculty Executive Committee reviewed the proposed policy on the Use of Animals in Research, Teaching, and Testing, The FEC concluded that it had no additional comments.

Yours sincerely,



Marcus Kaul, Ph.D.  
Chair, Faculty Executive Committee School of Medicine

TO: Kenneth Barish, Chair  
Riverside Division

FR: Richard M. Carpiano, Chair  
Senate Executive Committee, School of Public Policy

RE: [Systemwide Review] Proposed Policy: Presidential Policy on the Use of Animals in  
Research, Teaching, and Testing

Date: January 24, 2025

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The School of Public Policy (SPP) Senate Executive Committee reviewed the document  
“[Systemwide Review] Proposed Policy: Presidential Policy on the Use of Animals in Research,  
Teaching, and Testing.”

We have no comments to submit.

Sincerely,



Richard M. Carpiano, Ph.D., M.P.H.  
Professor of Public Policy





OFFICE OF THE ACADEMIC SENATE

9500 GILMAN DRIVE  
LA JOLLA, CALIFORNIA 92093-0002  
TELEPHONE: (858) 534-3640  
FAX: (858) 534-4528

February 13, 2025

Professor Steven Cheung  
Chair, Academic Senate  
University of California  
VIA EMAIL

Re: Divisional Review of Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing

Dear Chair Cheung,

The proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing was distributed to San Diego Divisional Senate standing committees and discussed at the February 10, 2025 Divisional Senate Council meeting. Senate Council endorsed the proposal and had no further comments.

The responses from the Divisional Committee on Faculty Welfare and Committee on Research are attached.

Sincerely,

A handwritten signature in black ink that reads 'Olivia Graeve'.

Olivia A. Graeve  
Chair  
San Diego Divisional Academic Senate

Attachment

cc: Rebecca Jo Plant, Vice Chair, San Diego Divisional Academic Senate  
Lori Hullings, Executive Director, San Diego Divisional Academic Senate  
Monica Lin, Executive Director, UC Systemwide Academic Senate

January 30, 2025

OLIVIA GRAEVE, CHAIR  
Academic Senate, San Diego Division

SUBJECT: Systemwide Review of Proposed Presidential Policy Use of Animals in Research, Teaching, and Testing

The Committee on Faculty Welfare (CFW) reviewed the proposed Presidential Policy Use of Animals in Research, Teaching, and Testing at its January meeting. The draft policy updates the current policy. The CFW endorses the proposed policy.

Sincerely,

Patrick Mercier, Chair  
Committee on Faculty Welfare

cc: R. Plant

January 23, 2025

**OLIVIA GRAEVE, Chair**  
**Academic Senate, San Diego Division**

SUBJECT: Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing

The Committee on Research (COR) discussed the Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing at their December 9, 2024 meeting. The Committee had no objections and endorsed the proposed policy.

Sincerely yours,

Julie Burelle, Chair  
Committee on Research

cc: J. Coomer  
L. Hullings  
R. Plant

Office of the Academic Senate  
Wayne & Gladys Valley Center for Vision  
490 Illinois Street, 5th Floor  
San Francisco, CA 94158  
Campus Box 0764  
[academic.senate@ucsf.edu](mailto:academic.senate@ucsf.edu)  
<https://senate.ucsf.edu>

Steve Hetts, MD, Chair  
Errol Lobo, MD, PhD, Vice Chair  
Elizabeth Rogers, MD, Secretary  
Kathy Yang, PharmD, MPH, Parliamentarian

February 18, 2025

Steven Cheung  
Chair, Academic Council  
Systemwide Academic Senate  
University of California Office of the President  
1111 Franklin St., 12th Floor  
Oakland, CA 94607-5200

**Re: Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing**

The San Francisco Division of the Academic Senate is pleased to comment on the Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing. Four committees commented on this review – the Committee on Rules & Jurisdiction (R&J), the Committee on Academic Freedom (CAF), the Committee on Research (COR), and the Graduate Council (GRAD).

**R&J**, while generally supportive, raised a concern regarding the policy's scope, particularly whether it includes UC affiliate sites. They recommended clarifying the policy to explicitly state if affiliates are excluded or to adjust the policy language to include affiliates, thereby ensuring comprehensive coverage and reducing confusion across different UC locations. Language should also be added to the policy's scope to include "volunteers, visiting scholars, and affiliates" to ensure clarity and consistency.

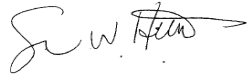
While, in general, the proposed policy is well grounded in broadly accepted ethical principles and federal regulations, **CAF**, **COR**, and **GRAD** all expressed concerns regarding the proposed policy's exclusive reliance on American Association for the Accreditation of Laboratory Animal Care (AAALAC) International for accreditation. They recommended broadening the policy to allow accreditation by comparable organizations to ensure research continuity and protect academic freedom. Specifically, **CAF** suggested including language that mandates compliance with relevant regulatory documents and encourages striving for accreditation by AAALAC or similar organizations. **COR** strongly advised retaining the language that allows research to continue while steps are being taken to regain accreditation, recommending the policy state: "maintain accreditation from AAALAC International or a similar accrediting body, or the Chancellor, Vice President, or Director shall be taking appropriate action to achieve such accreditation." Similarly, **GRAD** Members questioned what would happen if AAALAC were to deny accreditation to a UC campus and suggested alternative language to ensure that research and teaching activities could continue while addressing accreditation issues. Committee members proposed that each UC location should strive for accreditation by AAALAC or a similar independent voluntary accreditation organization, providing flexibility to avoid potential crises. Indeed, the consequences to health sciences research faculty of ending and then restarting all animal research programs on a campus would be devastating.

Additionally, **COR** recommended defining "Testing" within the policy to clarify its scope and distinguish it from "Research." Overall, their feedback aimed to maintain the policy's intent while providing flexibility to avoid disruptions in research and teaching activities.

Overall, the feedback from CAF, COR, and GRAD aimed to maintain the policy's intent while providing flexibility to avoid disruptions in research and teaching activities. Their recommendations ensure that the policy remains practical and supportive of UCSF's research, teaching, and testing activities.

Thank you for the opportunity to opine on this review. If you have any questions, please let me know

Sincerely,



Steven Hetts, MD, 2023-25 Chair  
UCSF Academic Senate

Enclosures (4)

Cc: Irfan Kathiriya, Chair, Committee on Rules & Jurisdiction (R&J)  
Andrea Hasenstaub, Chair, Committee on Academic Freedom (CAF)  
Kartika Palar, Chair, Committee on Research (COR)  
Bjoern Schwer, Chair, Graduate Council (GRAD)

February 10, 2025

Steven Hetts, MD, Chair  
UCSF Academic Senate

Re: Systemwide Review of the Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing

Dear Chair Hetts:

Graduate Council writes to comment on the Systemwide Review of the Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing.

At UCSF, animals are used in graduate student teaching and research, as well as postdoctoral trainee research, and Graduate Council supports the proposed policy revisions for the responsible and humane use of animals in these activities. However, the Council would like to raise one concern it found in its review of the policy.

Page six under Section V. Procedures in the proposed revisions to the policy include a provision that each UC Location must *maintain accreditation from AAALAC International, a voluntary accreditation organization that evaluates institutional Animal Care and Use Programs according to standards described in the Guide.*

Graduate Council questions what would happen if AAALAC were to deny accreditation to a UC campus at some point in the future. Would all animal research or teaching activities on that campus be stopped immediately? AAALAC is an independent outside organization, and if the organization makes a decision that UC believes to be unwise, or if AAALAC changes its name or stops operations, there could be serious implications to research and teaching at UCSF or other UC campuses.

Therefore, Graduate Council suggests the language below to capture the goal of the policy revisions without encouraging lawsuits against UC if AAALAC were to deny accreditation based on what UC believes to be unwarranted claims:

*Under this policy each UC Location must:*

- 1. Ensure their Program complies with all relevant regulatory and guidance documents, including those specified in Section IV.5. of this policy to maintain the well-being of the Animals under UC care.*
- 2. Hold an active PHS Animal Welfare Assurance with NIH/OLAW and a registration with USDA-Animal and Plant Health Inspection Service (APHIS) (if applicable).*

*In addition, under this policy each UC location should be subject to inspection and strive for accreditation by AAALAC International, or a similar independent voluntary accreditation organization, that evaluates institutional Animal Care and Use Programs according to standards described in the Guide.*

Graduate Council believes that this proposed language would avoid a potential crisis without changing the meritorious intent of the proposed policy revisions.

Thank you for the opportunity to comment on the revisions to this policy.

Sincerely,



Bjoern Schwer, MD, PhD  
Chair, UCSF Graduate Council, 2024-2025

## **Committee on Academic Freedom (CAF)**

**Andrea Hasenstaub, PhD, Chair**

February 18, 2025

Steven Hetts, MD  
Division Chair  
UCSF Academic Senate

### **Re: Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing**

Dear Chair Hetts:

The University of California, San Francisco (UCSF) Committee on Academic Freedom (CAF) is pleased to opine on this policy review. After careful consideration, CAF recommends revisions to the [Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing](#). While we agree with the need for external accreditation of animal care programs, we believe the current policy's sole focus on AAALAC accreditation is unnecessarily risky and restrictive.

We suggest revising the lines under section V. Procedures, subsection 2 to be changed from:

*Under this policy each UC Location must:*

*2. ... maintain accreditation from AAALAC International, a voluntary accreditation organization that evaluates institutional Animal Care and Use Programs according to standards described in the Guide.*

To read:

*Under this policy each UC Location must:*

- 1. Ensure their Program complies with all relevant regulatory and guidance documents, including those specified in Section IV.5. of this policy to maintain the well-being of the Animals under UC care.*
- 2. Hold an active PHS Animal Welfare Assurance with NIH/OLAW and a registration with USDA-Animal and Plant Health Inspection Service (APHIS) (if applicable).*
- 3. Be subject to inspection by and strive for accreditation by AAALAC International, or a similar independent voluntary accreditation organization that evaluates institutional Animal Care and Use Programs according to standards described in the Guide.*

This broader approach, allowing for accreditation by comparable organizations, and allowing research to continue while accreditation is sought, would better protect the academic freedom of UC faculty and researchers and ensure research continuity.

Thank you for taking the time to review UCSF CAF's comments. If you have any questions or concerns, please direct them to me or to the committee analyst, Sophia Root: [sophia.root@ucsf.edu](mailto:sophia.root@ucsf.edu).



Respectfully,

A handwritten signature in black ink, consisting of a series of fluid, connected strokes. The signature is positioned below the word 'Respectfully,'.

Andrea Hasenstaub, PhD, Chair

## Committee on Rules and Jurisdiction Irfan Kathiriya, MD, PhD, Chair

February 18, 2025

Steven Hetts, MD  
Division Chair  
UCSF Academic Senate

### Re: **Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing**

Dear Chair Hetts:

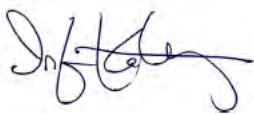
The Committee on Rules and Jurisdiction (R&J) writes to comment on the [Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing](#) that is out for systemwide review. R&J members discussed the policy and approved of the changes aside from one inquiry that needs clarifying.

R&J members noted that the policy does not explicitly mention whether it covers affiliate sites. If the policy intentionally excluded UC affiliates, this should be clearly stated. For instance, if affiliates already have policies on the use of animals that would not coordinate well with UC policy, then this should be explicitly mentioned.

If not, R&J believes that the inclusion of UC affiliates should be reflected in the policy language. For instance, the policy scope should add "...such as volunteers, visiting scholars, **and affiliates**" [emphasis added]. The definition of 'UC Location' should also mention UC affiliates in order to clarify that the policy does not exclude them.

R&J members believe that, given UCSF's extensive research, teaching, and testing efforts across various locations, the policy should apply to all UC-affiliated locations as long as it does not conflict with affiliate internal policies. A blanket policy would reduce confusion and improve compliance, ensuring that UC researchers, staff, and faculty understand that they must adhere to the policy regardless of their location. Thank you for taking the time to review R&J's comments. Please contact me or our committee's analyst, Sophia Root ([Sophia.root@ucsf.edu](mailto:Sophia.root@ucsf.edu)), if there are questions.

Sincerely,



Irfan Kathiriya, MD, PhD  
Committee on Rules and Jurisdiction Chair

**Communication from the Academic Senate Committee on Research**  
**Kartika Palar, PhD, Chair**

February 5, 2025

TO: Steven Hetts, Chair of the UCSF Division of the Academic Senate  
FROM: Kartika Palar, Chair, UCSF Committee on Research  
CC: Todd Giedt, Executive Director of the UCSF Academic Senate Office  
RE: Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing

Dear Chair Hetts:

The Committee on Research (COR) writes to comment on the Systemwide Review of the Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing. As an advocate for researchers at UCSF, COR appreciates the opportunity to provide feedback on this policy.

In general, COR feels that the proposed policy is well grounded in broadly accepted ethical principles and federal regulations. However, COR is concerned that in the revised policy, researchers are provided no contingencies to continue their work if accreditation by the American Association for the Accreditation of Laboratory Animal Care (AAALAC) is lost.

The previous version of the policy stated:

All facilities in which animals are housed shall be fully accredited by the American Association for the Accreditation of Laboratory Animal Care (AAALAC) **or the Chancellor, Vice President, or Director shall be taking appropriate action to achieve such accreditation** (emphasis added).

The revised policy states:

Under this policy each UC Location must: ... maintain accreditation from AAALAC International, a voluntary accreditation organization that evaluates institutional Animal Care and Use Programs according to standards described in the Guide.

COR strongly advises that the language “or the Chancellor, Vice President, or Director shall be taking appropriate action to achieve such accreditation” be retained in the revised policy so that faculty may continue conducting animal research if accreditation is lost, as long as steps are being taken to regain accreditation. The consequences to health sciences research faculty of ending and then restarting all animal research programs on a campus would be devastating. COR feels that as long as a campus takes immediate steps to remedy any issues that result in a loss of this voluntary accreditation, research should be permitted to continue.

Additionally, COR recommends writing “maintain accreditation from AAALAC International or a similar accrediting body.” AAALAC is a voluntary accreditation organization. Thus, adding language like “or a similar accrediting body” would allow the University flexibility if, in the future, the most appropriate accrediting organization changes.

In summary, COR recommends revising this section of the policy as follows:

Under this policy each UC Location must: ... maintain accreditation from AAALAC International, a voluntary accreditation organization that evaluates institutional Animal Care and Use Programs according to standards described in the Guide, or a similar accrediting body, or the Chancellor, Vice President, or Director shall be taking appropriate action to achieve such accreditation.

Finally, COR would like to recommend an addition to the Definitions section. Because one major change to the policy is the revision of its name from the "Use of Animals in Research and Teaching Policy" to the "Use of Animals in Research, Teaching, and Testing Policy," COR feels that it would be helpful to define "Testing" and explain how it differs from "Research" in the context of this policy. Adding this definition will ensure that users of the policy understand the breadth of situations in which it applies.

Thank you for the opportunity to comment on this important issue. If you have any questions on the Academic Senate Committee on Research's comments, please contact me or Academic Senate Analyst Liz Greenwood ([liz.greenwood@ucsf.edu](mailto:liz.greenwood@ucsf.edu)).



**UC SANTA BARBARA**

Academic Senate  
Rita Raley, Chair  
Shasta Delp, Executive Director

1233 Girvetz Hall  
Santa Barbara, CA 93106-3050  
<http://www.senate.ucsb.edu>

February 18, 2025

To: Steven Cheung, Chair  
Academic Senate

From: Rita Raley, Divisional Chair  
Academic Senate

A handwritten signature in blue ink, appearing to read "R. Raley".

Re: Systemwide Review of Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing

The Santa Barbara Division distributed the Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing to the Council on Research and Instructional Resources (CRIR), the Undergraduate Council (UgC), the Graduate Council (GC), the Council on Planning and Budget (CPB), the Council on Faculty Welfare, Academic Freedom, and Awards (CFW), and the Faculty Executive Committees (FECs) of the College of Letters and Science (L&S), College of Engineering (ENGR), College of Creative Studies (CCS), Gevirtz Graduate School of Education (EDUC), and the Bren School of Environmental Science and Management (BREN).

Although our campus does have a vivarium, the scale and scope of animal research is limited relative to other research areas. This institutional context may in part explain why CRIR, UgC, GC, CPB, CFW, and the BREN, L&S, and EDUC FECs elected not to opine.

The College of Engineering FEC noted in its response that the one member with experience in this area did not raise concerns about the policy as proposed.

We thank you for the opportunity to comment.

January 10, 2025

TO: Rita Raley  
Divisional Chair, Academic Senate

FROM: Carl Meinhart,  
College of Engineering, Faculty Executive Committee

Signed by:  
  
884262A07C384CC...

RE: Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing

The College of Engineering FEC met on Wednesday, January 8<sup>th</sup> and reviewed the Presidential Policy on the Use of Animals in Research, Teaching, and Testing.

Committee member Mukherjee explained current policies as they are implemented at UCSB because he is the only committee member with research experience in this area. Mukherjee explained that the proposed changes primarily update language for common use across UCs and align UC policy with federal regulation. UCSB is already in alignment with the proposed policy and he feels the policy is both necessary and effective.



# UNIVERSITY OF CALIFORNIA

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Academic Senate

Office of the President  
1111 Franklin Street  
Oakland, CA 94607

[senate.universityofcalifornia.edu](http://senate.universityofcalifornia.edu)

UNIVERSITY COMMITTEE ON RESEARCH POLICY (UCORP)

Susanne B. Nicholas, Chair

[SuNicholas@mednet.ucla.edu](mailto:SuNicholas@mednet.ucla.edu)

February 14, 2025

STEVEN CHEUNG  
CHAIR, ACADEMIC COUNCIL

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CAMPUSES

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RE: Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing

Dear Steven,

UCORP appreciates being involved in the review of the Proposed Revised Presidential Policy on the Use of Animals in Research, Teaching, and Testing, which was last updated in 1984. The UCOP staff responsible for revising the policy consulted with UCORP several times during the revision process. I am writing to convey UCORP's overall support for the new policy, which is an essential revision of the current policy.

We thank you for the opportunity to comment.

Sincerely,

Susanne B. Nicholas  
Chair, University Committee on Research Policy



Academic Senate

Office of the President  
1111 Franklin Street  
Oakland, CA 94607

senate.universityofcalifornia.edu

UNIVERSITY COMMITTEE ON PLANNING AND BUDGET (UCPB)  
Tim Groeling  
groeling@comm.ucla.edu

February 14, 2025

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Steven Cheung  
Chair, Academic Council

RE: Proposed Presidential Policy on the Use of Animals in Research, Teaching, and Testing

Dear Steven,

The University of California Committee on Planning and Budget (UCPB) has reviewed the RFC: Proposed Presidential Policy – Use of Animals in Research, Teaching, and Testing and has identified the following two concerns with the proposed policy:

First, overly broad definitions will increase regulatory costs: “Animal: as defined by federal regulations and accrediting bodies, is any live vertebrate animal (including laboratory, wildlife, and agricultural animals), used or intended for use in research, teaching, and/or testing...” (page 2)

“Animal Activities: for the purpose of this policy, any activity that involves the use of Animals for research, testing, and teaching.” (page 2).

Both definitions should exclude privately-owned animals that are not used for federally funded research. Individual campuses (such as the School of Veterinary Medicine at UC Davis) animal care programs will require review by a clinical trials review board or a peer-review subcommittee of the Institutional Animal Care and Use Committee (IACUC); these animals are not legally required to be part of the animal care program.

Unnecessarily including these animals subjects the IACUC and animal care program to increased costs associated with housing and study area inspections that may be remote from the campus and as well as to liability for oversight of facilities for which University officials have no jurisdiction (such as feedlots or private homes or non-UC animal clinics). IACUC



oversight over protocols for which there is no such requirement places increased demands on IACUC staff time and resources that should be directed towards the needs of protocols and facilities that require oversight.

Second, committee members were concerned that the proposed Policy is superfluous and risks future bureaucratic conflicts:

All campuses participating in animal research already have SOPs for their IACUC and animal research program. A second systemwide SOP that overlays campus SOPs unnecessarily reduces local program flexibility and increases the chance that dissonance between local and systemwide policies occurs over time.

If UCOP needs to have an overarching policy for the use of animals in research, it seems that the following two sentence statement would suffice:

“The University of California requires that all of its owned or managed facilities that participate in vertebrate animal research develop an animal care program and institutional animal care and use committee in accordance with all applicable local, state, and federal laws and regulations. Each UC location must hold an active PHS Animal Welfare Assurance with NIH/OLAW and a registration with USDA-Animal and Plant Health Inspection Service (if applicable) and maintain accreditation from AAALAC International.”

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Smith' or similar, written in a cursive style.

Chair  
UCPB

cc: UCPB