

Institutional Animal Care and Use Committee (IACUC) Standard Operating Procedure – SOP P010 - IACUC Procedures for the Investigation and Reporting of Animal Care and Use Concerns

The purpose of this procedure is to establish guidelines for the investigation of concerns regarding the mistreatment of animals or other deficiencies in animal care or treatment.

Definition: Allegations of animal mistreatment include the following:

- 1) The wrongful or abusive physical or psychological treatment of animals and
- 2) Non-compliance with established procedures or policies.

Procedure

Notice of animal misuse is reported to the Institutional Official (IO), Institutional Animal Care and Use Committee (IACUC) chair, facility staff, or any IACUC member, in person, on the phone, email or written note. In addition concerns can be sent on-line through MySafeCampus.com. Reports submitted on-line are sent to the Assistant Vice President for Research Compliance who sends them to anmlcare@isu.edu. Reports may be made anonymously and by anyone, ISU-affiliated or not.

Person receiving report sends to anmlcare@isu.edu no later than 3 calendar days after receipt. The IACUC manager will send message to chair and Attending Veterinarian (AV) upon receipt. If the report concerns the Chair, the Vice chair is notified.

AV determines whether or not animals or humans are in immediate danger. If so, AV can stop research. AV works with the Animal Facility Manager (AFM) to secure well-being of animals, which can include euthanasia. If immediate action appears warranted because animal or human welfare may be compromised, the IACUC should notify the IO and proceed accordingly. Veterinary medical intervention, suspension of a research activity, and/or notification of appropriate safety, occupational health, or other officials, are examples of actions that may be taken immediately to protect animal or human welfare. In accordance with the Animal Welfare Regulations (9 CFR Part 2, Subpart C, Section 2.31[d][7]), if an activity is suspended, the IO shall report that action to APHIS and any federal agency funding that activity. If the activity is supported in any way by the PHS, the IACUC, through the IO, must promptly notify OLAW (PHS Policy, IV.F.3.) (OPRR Reports 94-02, 1/12/94).

During the academic year, the Chair convenes meeting of IACUC within 5 working days of receiving report. In the summer, when the IACUC does not meet and faculty are not on contract, the meeting will be convened within 10 working days. Summer meetings will not require a quorum to be present in person. Call-ins are allowable in the summer for this issue.

IACUC reviews and makes determination: 1) further investigation or 2) no action. This decision is based on a review of the complaint and the Guide. All decisions and actions by the IACUC will be indicated in meeting minutes.

Should the IACUC determine that further investigation is required, the IACUC will conduct the investigation, or appoint the Chair, another individual or subcommittee appointed by the IACUC, to conduct the investigation and report back to the IACUC. It is important to avoid actual or perceived conflicts of interest in this process. Any member of the IACUC involved in the investigation who has a conflict of interest should declare that fact and recuse themselves from the investigation.

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Within 5 working days of the IACUC deciding to conduct an investigation, the respondent (PI the allegation is made against) will be notified of the investigation.

The IACUC should charge the designated person or group with its requirements for information gathering and impose a completion date. The assigned completion date will depend on the IACUC's determination of whether immediate remedial action may be required, but will be completed no later than 20 working days after the IACUC determination.

The nature of the information required for the investigation will vary depending on the circumstances, but often involves:

- interviewing complainants (if known), any persons against whom allegations were directed, and pertinent program officials;
- observing the animals and their environment; and
- reviewing any pertinent records, (e.g., animal health records, protocol, and other documents).

The designated investigator(s) should provide a report to the IACUC, which summarizes:

- the concern(s),
- the results of interviews,
- the condition of animals and their environment, and
- the results of records and other document reviews.

The report should also contain:

- any supporting documentation such as correspondence, reports, and animal records,
- conclusions regarding the substance of the concerns *vis-à-vis* requirements of the AWRs, the *PHS Policy*, the *Guide*, and institutional policies and procedures, and
- recommended actions, if appropriate

Outcomes and Final Actions

Upon receipt and evaluation of the report, the IACUC may request further information or find that:

- there was no evidence to support the concern or complaint,
- the concern or complaint was not sustained, but a) related aspects of the animal care and use program require further review or b) other institutional programs may require review, or
- the concern or complaint was valid.

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A report will be submitted to the IO within 20 days of the finding with the results of the investigation. If the complaint is determined to be valid subsequent actions of the IACUC may include the following and will also be included in the IO report.

- implementing measures to prevent recurrence (such measures often include changes in administrative, management or IACUC policies and procedures, and may include sanctions);
- notifying funding or regulatory agencies, as required; and
- notifying the complainant, any persons against whom allegations were directed, and pertinent program officials (appropriate supervisory and management staff, the public affairs office, institutional attorneys, etc.).

Institutional sanctions, determined by the IO, that may be recommended include:

- counseling;
- issuing letters of reprimand;
- mandating specific training aimed at preventing future incidents;
- monitoring by the IACUC or IACUC-appointed individuals of research, testing, or training that involving animals;
- temporary revocation of privileges to provide animal care or to conduct research, testing, or training that involves animals, pending compliance with specific, IACUC-mandated conditions;
- permanent revocation of privileges to provide animal care or to conduct research, testing, or training that involves animals; and
- recommending to the IO that institutional (e.g., reassignment, termination of employment) sanctions be imposed.

A letter will be submitted to the PI from the IO within 20 days of the IACUC finding outlining the results and any sanctions to be implemented. The PI will have 20 working days from date of the letter to refute the finding. The IO will meet with the PI and the faculty ombudsperson and render a final decision within 20 working days from the date of the PI's letter of refutation.

Funders, if applicable, will be notified of results. Appropriate reporting will happen to OLAW or USDA as required.

CONCERNS UNRELATED TO ANIMAL CARE AND USE: The IACUC may determine, either in its initial evaluation of a concern or as a result of investigation, that violations of non-animal-related institutional policies and procedures, local, state or federal statutes, regulations, or laws may have occurred (e.g., scientific misconduct, misuse of monies, fraud, theft, etc.). In such cases, those findings should be reported to appropriate institutional officials or committees for their consideration. The IACUC will not investigate these concerns.

Adapted from, ARENA/OLAW 2002 Institutional Animal Care and Use Guidebook p. 163-166

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Abbreviations

IO- Institutional Official

IACUC – Institutional Animal Care and Use Committee

AV- Attending Veterinarian

AFM – Animal Facility Manager

PI- Principal Investigator

OLAW – Office of Laboratory Animal Welfare

AWR – Animal Welfare Regulations