

IACUC POLICY AND PROCEDURE STATEMENT

Policy/Procedure: Reporting and Investigating Protocol Deviations and Allegations of Animal Mistreatment

Policy/Procedure ID: 09-03-001

Effective: March 20, 2009

PURPOSE:

It is the policy of Bowling Green State University that the care, use, and treatment of University-owned laboratory animals be of high quality and in compliance with all federal, state, and local regulations. The law requires that all persons involved or in any way associated with the use of animals in research know how to report animal mistreatment and/or protocol deviations (Animal Welfare Act, Title 7). There are no restrictions on who can report a noncompliance. Anyone who has knowledge of such noncompliance is obligated to report it to the proper Bowling Green State University official immediately.

This policy will be distributed to all personnel involved in animal research at BGSU during annual investigator training sessions. Personnel attending these sessions will be required to sign a document indicating that they have received and understand this information. Principal investigators are responsible for insuring that all personnel involved in research activities under their direction are aware of the above procedures.

DEFINITIONS:

Animal Mistreatment: The wrongful, abusive physical or psychological treatment of an animal that does not comply with established procedures or policies.

Noncompliance: Activities or failure to act such that either an IACUC approved protocol, local, state and/or federal law is violated.

Protocol Deviations: Actions involving animals which were not approved by the IACUC at a convened meeting.

REPORTING:

In accordance with the public law [9 CFR, Part 2, Subpart C 2.32(c) (4)], under no circumstances will reporting such incidences be detrimental to an individual's standing within the organization. All reports will be considered privileged

information by the Committee. Instruction regarding the methods by which allegations may be made to the IACUC and whistle-blower protection will be outlined in mandatory investigator training sessions. In addition, these instructions will be posted on bulletin boards in each building where research animals are used. Timely reporting is essential to protect the animals involved and to aid the investigation of warranted allegations.

PROCEDURES FOR REPORTING:

- a. If a person actually witnesses mistreatment or abuse, the witness will immediately notify the Animal Facilities Director (419-372-8753) or the IACUC Chairperson through the Compliance Officer (419-372-7716) so that the animal(s) involved can be evaluated and receive medical treatment if necessary.
- b. Reports of suspected protocol deviations should be made in writing whenever possible and should include, but need not be limited to, the nature place date and time of the occurrence, the person or persons alleged to be delinquent, and any additional supporting facts. Reports can be sent anonymously to the IACUC Chair at hsrb@bgsu.edu (201 South Hall), the UAF Director at uaf@bgsu.edu (102 Life Sciences), the Institutional Official (Graduate College, 120 McFall Center), or any member of the IACUC.

IACUC PROCEDURES FOR THE INVESTIGATION OF A COMPLAINT:

The IACUC Chair is responsible for the receipt and disposition of all complaints. All allegations will remain confidential to the extent possible until proven or disproven. When the complainant wishes to be openly identified, the IACUC Chair will acknowledge receipt of the allegation to the complainant in writing. The IACUC Chair will present all allegations to the IACUC during its next meeting. The IACUC will then determine if the complaint has sufficient substance to warrant a full investigation. The IACUC will determine the procedures by which it will carry out an investigation. All persons involved in the investigation will be informed in writing of the purpose of the investigation and the manner in which it will be conducted.

If there is indication of serious noncompliance, the IACUC may suspend activity under an approved protocol. Animals will be maintained during the investigation using the same approved procedures described in the protocol so that the animals can be used pending the outcome of a full investigation. The IACUC will examine all pertinent documents, animals, procedures, and interview involved personnel during

its investigation. Persons against whom the complaint is made will be given the opportunity to appear before the committee. The final results of the investigation will be presented during a formal meeting of the IACUC and all committee members will be given the opportunity to present minority views. The IACUC will inform all parties involved, including the complainant (if identified), of the committee's findings.

The results will be forwarded to the Institutional Official with appropriate recommendations.

- a. If following an investigation of the alleged incident the IACUC finds no evidence of animal mistreatment or noncompliance, the report of the investigation will be forwarded to the Institutional Official with the recommendation that no further action be taken.
- b. If allegations of animal mistreatment are substantiated, the Institutional Official will be advised of the committee's findings and recommendations. The Institutional Official will then take appropriate action after consulting with the IACUC and reviewing the results of the IACUC investigation. The Institutional Official has the authority to impose sanctions on an investigator found responsible for mistreatment or noncompliance. The decision of the Institutional Official is final.
- c. IACUC is empowered by USDA Regulation and PHS policy to suspend a previously approved project pending review by the Institutional Official. In this case, and whenever IACUC suspends an activity involving animals (for example when activities are suspended pending the outcome of an investigation), the Institutional Official must report the action with a full explanation to APHIS and any Federal funding agency including OLAW.