Clemson University

Institutional Animal Care and Use Committee (IACUC) Bylaws

Revisions Approved 11.12.14

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I. PREAMBLE

The Institutional Animal Care and Use Committee (IACUC) is responsible for the oversight of the Clemson University animal program, facilities, and procedures and for review of all (vertebrate) animal research, teaching, testing and production activities conducted at, or in association with Clemson University. The IACUC assures that animal care and use is in compliance with all federal, state, and local regulations as well as university policy and assurances. The basis of compliance is determined by the Animal Welfare Act regulations (P.L. 89-544) and amendments, the Guide for the Care and Use of Laboratory Animals, the Guide for the Care and Use of Agricultural Animals in Agricultural Research and Teaching, the PHS Policy on the Care and Use of Laboratory Animals, the FDA Good Laboratory Practices, and other applicable regulations.

The IACUC is the principal advisory source on humane care and use of animals within the University and, as such, the appropriate body for reviewing and investigating concerns or complaints involving the appropriate care and use of animals. The Committee has the authority to negotiate modifications, suspend or terminate animal activities deemed not in compliance with these regulations.

The IACUC will establish policies to provide guidance, procedures and requirements to implement the bylaws and clarify operational issues.

The Committee shall, semi-annually, review the University animal program and inspect all university animal facilities. The Committee shall review and approve the care and use of all animals as described in animal-use protocols. The Committee will recommend to the Institutional Official changes and improvements to the University animal program or facilities necessary to maintain a high quality animal research program and to maintain compliance with all appropriate regulations.

Clemson University’s Institutional Animal Care and Use Committee (IACUC) will:

1. Review at least once every six (6) months the institutional program for humane care and use of animals using the Guide for the Care and Use of Laboratory Animals and the Guide for the Care and Use of Agricultural Animals in Agricultural Research and Teaching as a basis for evaluation.

2. Inspect at least once every six (6) months all institutional animal facilities, (including satellite facilities) using the Guide for the Care and Use of Laboratory Animals and the Guide for the Care and Use of Agricultural Animals in Agricultural Research and Teaching as a basis for evaluation.

3. Prepare reports of the IACUC evaluations as set forth in the PHS Policy at IV.B.3. and submit reports to the Institutional Official.

4. Review concerns involving the care and use of animals at Clemson University and/or its satellite facilities.

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5. Review and approve, require modifications in (to secure approval), or withhold approval of those activities related to the care and use of animals as set forth in the PHS Policy at IV.C.

6. Supply the Institutional Official with the necessary reports and make recommendations regarding any aspect of the institution’s animal program, facilities, or personnel training.

7. Review and approve require modifications in (to secure approval), or withhold approval of proposed significant changes regarding the use of animals in ongoing activities as set forth in the PHS at IV.C.

8. Notify investigators and the institution in writing of its decision to approve or withhold approval of those activities related to the care and use of animals or of modifications required to secure IACUC approval as set forth in the PHS Policy at IV.C.4.


10. Collaborate with the Medical Surveillance Program by withholding approval of research protocols pending validation by the Occupational Health Nurse of completion of enrollment in the Clemson University Medical Surveillance Program.

II. MEMBERSHIP

A. Composition

1. The IACUC must be sufficiently qualified through the experience, expertise, and diversity of its members to maintain oversight of the university animal care and use program, facilities, and procedures and to provide complete and adequate review of all animal activities conducted within the university.

2. Candidates for IACUC appointment will be compiled by the Office of Research Compliance [ORC] and forwarded to the I/O. Candidates may be nominated by faculty and staff.

3. The composition and size of the Committee will be determined by the Institutional Official [I/O] and the President. All members will be appointed by the President of the University.

4. The Committee will consist of a minimum of 5 voting members to include: The Chair, the Attending Veterinarian; at least one practicing scientist experienced in animal research; one individual having no affiliation with the University (other than as a member of this Committee) and no family member affiliated with the university; and one individual whose primary concern is non-scientific in nature.

5. If an individual meets the requirements of more than one of the categories detailed in II. A., then that member may fulfill more than one category. However, at no time will the Committee consist of fewer than 5 voting members in accordance with PHS
policy. The Committee must not include more than three voting members from any department.

6. The Committee may include non-voting ex-officio members. The Committee may invite consultants, as needed.

7. Alternates are appointed by the President and must be listed on the IACUC roster. An alternate may be appointed for each voting position on a specific one-to-one designation of IACUC members. Alternates will assume full voting privileges when the corresponding member is unavailable for one or more meetings or activities.

B. Terms and Appointment

1. Voting members are generally appointed to serve up to a three (3) year term, with exceptions being: the Attending Veterinarian, whose term is indefinite.

2. Members may be eligible for reappointment to the Committee.

3. Members may serve consecutive terms as needed.

C. Officers and Responsibilities

1. The Chair will be appointed by the President, and will preside over all IACUC activities. The Chair may be reappointed to consecutive terms. The Chair will be assumed by the Vice Chair following written appointment as Chair by the President. If the Vice Chair is unable or unwilling to serve as Chair, the appointed Chair should have served a minimum of six months on the IACUC to be eligible for that position. The Chair assigns reviewers, appoints subcommittees, reviews reports of animal concerns and serves to facilitate all activities of the IACUC.

2. The Vice Chair will be appointed by the President and will serve as Chair in the absence of the IACUC Chair either at the request of the Chair or in the event that the Chair is unreachable or incapacitated. The Vice Chair will assume all duties, rights, and responsibilities of the Chair when serving as the Chair. The Vice Chair should have a minimum of six months (current or previous service) on the IACUC to be eligible for that office. The Vice Chair will replace the Chair with the approval of the President upon resignation of the Chair, at which time, a new Vice Chair will be appointed by the President. In the event a suitable Vice Chair cannot be appointed, the previous Chair may assume Vice Chair responsibilities until a suitable Vice Chair can be appointed.

3. The Attending Veterinarian serves as a member of the IACUC. The Attending Veterinarian is responsible for all aspects of the animal health program. It is also the responsibility of the Attending Veterinarian or his/her designee to review all protocols. Additionally, the Attending Veterinarian consults with the principal investigator and any other personnel involved in the care and use of animals regarding handling, immobilization, anesthesia, analgesia, tranquilization, euthanasia, pre- and post-procedural care, surgical procedures and any other procedure that may cause pain and or distress during animal activities conducted within the University. The Attending Veterinarian may recommend, and will review and approve, or require modifications.
(to secure approval) for all Standard Operating Procedures (SOP) regarding care and use of Clemson owned animals. The Attending Veterinarian has the authority to institute immediate actions to protect the welfare of animals in the care of Clemson University, including the authority to institute “emergency care”. Upon institution of “emergency care”, the Assistant Vice President for Research Compliance, IACUC Chair, and appropriate farms and facility managers and investigators will be notified that such authority has been exercised.

4. The IACUC Administrator and the Office of Research Compliance (ORC) are responsible for providing administrative and compliance support for the IACUC. These responsibilities include but are not limited to: coordinating IACUC activities such as protocol reviews; site visits and inspections; preparing annual reports; providing regulatory information and documents to members; assisting in the evaluation of the Committee in fulfilling the responsibilities outlined in these Bylaws; recording and disseminating minutes of all IACUC meetings, preparing correspondence and reports, issuing notices of meetings; preparing the agenda for the presiding officer; and other related duties. The IACUC Administrator will obtain guidance from the Chair regarding the assigned reviewers and the review type. Reviewers will be assigned according to Section IV.D.

D. Responsibilities of Members

All members are expected to exhibit high ethical standards of conduct. If conduct of any IACUC Committee member is brought to the attention of the ORC by any IACUC member, faculty, or staff, the ORC will evaluate allegations and make recommendation to the Institutional Official.

The IACUC recognizes that University research scientists must conduct their research in a timely fashion. Therefore, to facilitate research while ensuring animal welfare, the Committee must conduct its business as efficiently as possible. This can only be accomplished by all Committee members participating in Committee activities, including:

1. Responsibilities of Members
   a) Attend and participate in meetings, facility inspections and program reviews
   b) Conduct thorough reviews of assigned protocols in a timely fashion
   c) Maintain appropriate confidentiality
d) Perform duties as assigned by the Chair

e) Call for continuing review of any protocol at any time

f) If unable to attend a meeting or activity, notify the Chair, the Administrator and the alternate (if appropriate) as soon as possible

g) Be familiar with all documents pertinent to the performance of duties as an IACUC member

2. Responsibilities of Alternate Members

Assume the responsibilities of the assigned member when that member is not available for one or more meetings or activities.

III. RULES OF ORDER

All meetings shall be governed by *The Modern Edition of Robert's Rules of Order*, except as otherwise indicated in this document.

A. Types of Meetings

1. Regularly Scheduled Meetings

   a) The IACUC will schedule meetings on a day agreed upon by a quorum of the Committee. Members will be notified a minimum of five (5) calendar days prior to the meeting.

   b) An agenda listing all proposed activities to be reviewed along with written descriptions of all proposed activities involving the care and use of animals will be provided to all IACUC members five (5) calendar days prior to the scheduled meeting. The names of respective primary and secondary reviewers on protocols requiring full committee review will be provided with the agenda.

2. Unscheduled Meetings

The IACUC Chair or the Assistant Vice President for Research Compliance may call an unscheduled meeting for an emergency or to address time sensitive issues.

   a) Emergency Meeting

      (1) An emergency is defined as any situation or condition that may jeopardize the health or safety of animal subjects or humans in association with animal subjects.

      (2) When notified that the Attending Veterinarian has instituted emergency care as described in II. C. 3, the IACUC Chair or Assistant Vice President for Research Compliance will convene emergency meeting as soon as a
quorum can be constituted.

b) Meetings to Address Time Sensitive Issues

(1) Any member may request an unscheduled meeting by contacting the IACUC Chair or the Office of Research Compliance.

(2) Such requests should be in writing and explicit as to the reason and nature of the request.

(3) Requests will be judged by the IACUC Chair and the Assistant Vice President for Research Compliance to be legitimate or not.

(4) Notice should be given to members 48 hours prior to the meeting.

B. Voting

With the exception of Designated Member reviews, approval on any motions or actions of the Committee may be granted only at a convened meeting of a quorum of the IACUC and with the approval vote of a majority of the quorum present. All votes will be tallied and recorded in the minutes as: For, Against, or Abstaining. Any minority views will also be recorded in or with the minutes. Designated Member reviews are considered approved upon recommendation of the designated reviewer after the 5 day open review period.

C. Conflict of Interest

1. An IACUC member shall not participate in the IACUC review or approval of an activity in which that member has a conflicting interest. The member may provide information to the Committee, if the Committee so desires. However, the member must excuse himself/herself during these deliberations and voting. Excused members will not count toward a quorum.

2. If any member perceives that another member has a conflict of interest that has gone unrecognized, the allegation may be brought to a vote by quorum of the IACUC.

3. If an investigator submitting a protocol believes that an IACUC member has a potential conflict, the investigator may request that the member be excluded. Either the member may voluntarily recuse himself/herself from the issue or a vote of the Committee quorum will be obtained to either sustain or reject the request from the submitting investigator.

4. Possible examples of conflict of interest which may require the judgment of the Committee include cases where:

   a) A member is involved in a potentially competing research program

   b) Access to funding or intellectual information may provide an unfair competitive advantage
c) A member's personal biases may interfere with his or her impartial judgment.

d) Member is PI, Co-PI, investigator, or listed personnel on a protocol under review.

e) Member derives direct or indirect economic benefit from the outcome of a review.

D. Subcommittees

The IACUC Chair may appoint and charge subcommittees.

IV. PROTOCOL REVIEW AND APPROVAL PROCEDURES

The Animal Welfare Act (P.L. 89-544) and amendments, the ILAR Guide for the Care and Use of Laboratory Animals, the Guide for the Care and Use of Agricultural Animals in Agricultural Research and Teaching, USDA APHIS Animal Care Policies and the PHS Policy on the Care and Use of Laboratory Animals will be used as basis for review and approval. Any proposal for animal use approved by the IACUC may be subject to further approval by the I/O or President. However, neither the I/O nor President may approve activities involving the care and use of animals that have not been approved by the IACUC.

A. Principal Investigator

The principal investigator as defined by the I/O is responsible for all submissions to the IACUC Administrator. Prior to submission to the IACUC Administrator, the Attending Veterinarian must be consulted regarding veterinary care procedures and pain and distress.

B. Attending Veterinarian

The Attending Veterinarian will conduct a pre-submission review/consultation in a timely fashion. This consultation will cover but shall not be limited to discussion associated with study experimental design, the use of animal subjects, project personnel, study personnel training requirements, animal well being, use of analgesia, anesthesia, surgical procedures, housing needs, source of animals, quarantine requirements, requirements for special housing and/or equipment, duration of the study, euthanasia methods, humane end points, and care of the animal subjects during the study.

Documentation of the pre-submission review/consultation will be provided to the IACUC Administrator before the AUP will be sent for further review. This documentation will include assignment of pain category.

C. IACUC Administrator

The IACUC Administrator, in consultation with appropriate persons:
1. Performs an administrative review of submissions, to include the review of
protocol/grant proposal congruency,

2. Initiates the review process in a timely fashion,

3. Provides the principal investigator a listing of information or sections needed to
complete the submission if the protocols is incomplete, and

4. Categorizes the submissions as: new protocols, amendments, and annual reviews.
New protocols, renewals and annual reviews shall be reviewed and approved by full
committee or designated review procedures. Amendments to approved protocols may
be reviewed and approved by full committee, designated review or administratively
reviewed and approved by the IACUC Chair or designee.

D. IACUC Chair

The IACUC Chair determines the type of review (Full or Designated) and assigns
reviewers. To expedite Committee functions, if the Chair is not available, the Vice Chair
may make the assignments.

E. IACUC Review Process

Any Committee member may request anytime in writing or subject to recording in the
official minutes of a called meeting a designated review be changed to a full committee
review prior to approval. Written requests will be submitted to the IACUC Chair and the
IACUC Administrator.

1. Full Committee Review

Submissions must receive full committee review under the following conditions:
   a) Major survival surgical procedure

   b) Exceptions to recommendations in the ILAR Guide or Ag Guide

   c) Euthanasia methods that are not consistent with AVMA Guidelines

   d) Studies where death is the experimental endpoint

   e) Experiments which involve any of the following
      i. burn studies
      ii. head trauma

   f) Potential for more than minimal or transient pain, distress, or discomfort not
      relieved by drugs

   g) Any procedure involving non-human primates, dogs or cats.

2. Full Committee Review Procedures

   a) A primary and secondary reviewer will be assigned as noted in IV.D. and the
      Office of Research Compliance shall notify reviewers and all other IACUC
members that a new submission has been posted. If a member of the IACUC has been identified as having a conflict of interest, that member shall not be assigned as the primary or secondary reviewer.

b) The secondary reviewer and other members shall post comments on the general reviewer form within 5 calendar days of posting.

c) The primary reviewer shall review the submission, as well as comments on the General Reviewers Form from the IACUC members, and should contact the principal investigator to resolve any potential problems. The primary reviewer will strive to ensure all items identified for correction are corrected before the IACUC meeting during which the protocol or amendment is discussed. The primary reviewer should complete the initial reviewer form within 7 calendar days of posting but not before the general review period has ended (i.e., 5 calendar days). If required, final review comments and recommendations should be written in language to allow direct posting to the approval letter. Minor changes agreed to by the principal investigator and the primary reviewer may be corrected in the submissions by the IACUC Administrator or primary reviewer. Significant or extensive modifications will be made by the principal investigator and submitted to the IACUC office as a revised protocol.

d) During a convened meeting, the primary reviewer, secondary reviewer or Chair shall present the protocol and the recommended action. The recommended actions include approval, require modifications to secure approval, or withhold approval.

e) The Administrator will prepare the approval letter for the Chair's signature. A copy of the signed correspondence and a copy of the AUP approved by the IACUC will be sent to the principal investigator within one week. Copies will be maintained in the protocol file.

3. **Designated Review**

a) Submissions that do not require full committee review may be assigned to designated review.

b) Submissions for designated review will be processed as described for full committee review with the exception that a secondary reviewer will not be assigned. If there are no calls for full committee review within 5 calendar days, the designated reviewer can approve the protocol or require modification to secure approval. Protocols that the designated reviewer cannot approve will be reviewed by full committee.

c) The designated reviewer will review the submission, as well as comments on the General Reviewers Form IACUC members, and should contact the principal investigator to resolve any potential problems. The designated reviewer will strive to ensure all items identified for correction are corrected before the IACUC meeting during which the protocol or amendment is discussed. The designated reviewer should complete the primary reviewer form within 7 calendar days of posting but not before the general review period has ended (i.e., 5 calendar days). Should the designated reviewer decide not to address general reviewer(s)
comments, the designated reviewer will inform the general reviewer(s) of their decision before final approval is given to allow general reviewers the opportunity to call for full committee review. Minor changes agreed to by the principal investigator and the primary reviewer may be corrected in the submissions by the IACUC Administrator or primary reviewer. Significant or extensive modifications will be made by the principal investigator and submitted to the designated reviewer and IACUC Administrator as a revised protocol.

d) If a member requests a full committee review, a secondary reviewer will be assigned by the Chair and the protocol or amendment will be reviewed in accord with full committee review procedures.

e) The IACUC Administrator will prepare the official correspondence for the Chair’s signature. A copy of the signed correspondence and a copy of the AUP or amendment approved by the IACUC will be sent to the principal investigator within one week. Copies will be maintained in the protocol file.

4. Post-approval Modifications and Monitoring

a) Review of Amendments

Review of amendments will be conducted in accordance with IACUC Policy #13.

b) Annual Review Procedures

(1) Approved protocols must be reviewed at least annually. Four to six (6) weeks prior to the anniversary date of an approved protocol, the IACUC Administrator will inform the principal investigator that the annual review form must be completed and returned in sufficient time to assure review and approval before the anniversary date of the approval.

(2) Principal investigators are encouraged to submit the annual review form at least two weeks prior to the anniversary date of the approved protocol. If no response has been received two weeks prior to the anniversary of the approval date, the Administrator sends a final notice. If the annual review has not been received by the anniversary date, the IACUC will take action to ensure animal care and use is in compliance with federal law.

(3) Completed annual review forms are assigned to designated review. The designated review is usually conducted by the Chair or his/her designee and the Attending Veterinarian or his/her designee.

(4) If any member requests a full committee review, the Chair assigns, within one business day, a secondary reviewer and notifies all IACUC members that the annual review will be a full committee review.

c) Departure or Absence of PI

Departure or Absence of a PI will be handled in accordance with IACUC Policy #10.
d) **Post-approval Monitoring**
Any member may call for full committee review of previously approved protocols at any time. Additionally, all members are authorized to observe and evaluate approved activities for compliance with the approved protocol.

5. **Record Keeping & Retention**

To comply with Clemson University’s record retention policy, IACUC records shall be maintained for a minimum of five years.

6. **Principal Investigator Appeal Process**

a) To ensure timely review and approval of animal use protocols, principal investigator must work with the primary reviewer of their Animal Use Protocols to assure that requests for clarifications, recommendations and concerns are fully addressed during the review process and before the scheduled meeting of the IACUC.

b) If the principal investigator has concerns about the review process or the preliminary recommendations of the primary reviewer or the attending veterinarian, the principal investigator may schedule to meet with the full committee at the monthly IACUC meeting. The primary investigator(s) will be given an opportunity to present information, discuss the proposed protocol and to ask and answer questions prior to the IACUC vote on the protocol.

c) In order for an item to be placed on the agenda of the upcoming IACUC meeting, the principal investigator must contact the Office of Research Compliance by e-mail or telephone at least five days before the meeting. Contact the IACUC chair or the IACUC Administrator in case of special circumstances.

V. **FACILITIES REVIEW AND PROGRAM EVALUATION**

A. **Inspection of Animal Facilities and Animal Activity Areas**

1. The IACUC will inspect all university animal facilities (as defined in the PHS Policy and Animal Welfare Act) at least once every six months. Inspection of animal facilities and animal activity areas will be scheduled by the IACUC Administrator.

2. An Inspection Committee of the IACUC will conduct the inspection/evaluation. The Inspection Committee must include at least the veterinarian designee and one or more voting members. Any member wishing to participate may not be exclude.

3. The inspection report shall be reviewed and approved during a convened meeting of the IACUC and include any minority views.

B. **Evaluation of Clemson University Program for the Humane Care and Use of Animals**

1. The IACUC shall review, at least once every six months, the Clemson University program for the humane care and use of animals, using the ILAR Guide and the PHS
Semiannual Program and Facility Review Checklist as a basis for the evaluation. Procedures to assure a comprehensive evaluation of all program components should include a review of protocol compliance, personnel training records, veterinary care, animal health records and the occupational health and safety programs during the IACUC inspection of animal facilities and animal activity areas.

2. In addition, the IACUC shall review reports at least every six months from those persons responsible for specific program components (e.g., a report on the veterinary care program from the attending veterinarian, a report on the occupational health program from the occupational health nurse). The reports, a compilation of six monthly reports, on veterinary care and OHS medical surveillance should identify and describe any deviations from the ILAR Guide, AG Guide, and the NRC publication “Occupational Health and Safety in the Care and Use of Research Animals”. The reports should include changes in personnel, training, facilities or procedures that modify the current CU AAALAC program description.

3. All reports related to the Clemson University animal care and use program should be reviewed during a convened meeting of the IACUC.

4. All minority opinions shall be included in the semi-annual program review submitted by the IACUC to the Institutional Official.


1. The IACUC shall submit a report of the program review and facilities inspection to the Institutional Official at least every 6 months.

2. The report shall identify all facility and program deficiencies. The IACUC shall refer to the ILAR Guide, AWA Regulations, and the PHS Policy regarding definitions of deficiencies and reporting requirements.

3. The report shall include a plan of action and timelines for resolution of all deficiencies.

4. Any failure to correct significant deficiencies shall be reported in accord with federal regulations to the Institutional Official, to OLA and USDA, and funding agency.

VI. ANNUAL REPORTS

Annual reports will be made available for review by IACUC members.

A. USDA-APHIS (UNITED STATES DEPARTMENT OF AGRICULTURE-ANIMAL AND PLANT HEALTH INSPECTION SERVICE)

1. An annual report will be prepared according to the provisions of 9 CFR 2 (Subpart A, 2.36).
2. This report will be submitted by ORC to the Institutional Official for signature.

3. The ORC will submit the report to APHIS per guidelines established by APHIS.

B. PHS (Public Health Service), OLAW (Office of Laboratory Animal Welfare)

1. An annual report will be prepared according to the requirements of the PHS Animal Welfare Policy (IV. F.) at least once every 12 months.

2. This report will be reviewed and submitted to the Institutional Official for signature.

3. The ORC will submit, through the Institutional Official, the report to OLAW.

4. The IACUC, through the Institutional Official, will provide OLAW with a full explanation of the circumstances and actions regarding:
   a) Serious or continuing noncompliance
   b) Serious deviations from the NIH Guide
   c) Suspension of any PHS funded activity by the IACUC.

C. AAALAC (ASSOCIATION FOR ASSESSMENT AND ACCREDITATION OF LABORATORY ANIMAL CARE INTERNATIONAL)

1. A report is prepared and sent to AAALAC at least once every twelve months.

2. This report will be submitted by ORC to the Institutional Official for signature.

3. The ORC will submit the report to AAALAC per guidelines established by AAALAC.

VII. TRAINING

A. Committee Members

1. Committee members will receive copies of these Bylaws, the Animal Welfare Regulations, the PHS Policy, the NIH Guide to the Care and Use of Laboratory Animals, and the Guide for the Care and Use of Agricultural
Animals in Agricultural Research, as well as copies of individual policies developed by the IACUC regarding specific animal use issues.

2. The Office of Research Compliance will provide initial and continuing training for IACUC members.

B. Faculty, Staff, and Students

1. The IACUC will be responsible for oversight of teaching and training activities related to animal care and use.

2. The Office of Research Compliance and the Office of Research Services will provide appropriate training as mandated by the Animal Welfare Act and the PHS Policy to all faculty, staff and students involved in the care and use of animals in research and teaching programs at Clemson University.

3. The Principal Investigator will verify that all students enrolled in classes requiring AUP’s have successfully completed the required Animal Welfare Training, Zoonotic Training, and are enrolled in the Medical Surveillance Program.

4. The Principal Investigator will be responsible for verifying that all personnel working on his/her particular protocol are qualified to perform their duties and/or have received additional required training based on an individual’s role in research or teaching activities involving the use of animals.

VIII. REPORTING ANIMAL CONCERNS OR NONCOMPLIANCE

Reports of animal concerns or noncompliance will be handled in accordance with IACUC Policy #15.

IX. Changes to the Bylaws

Any member may request a review of any part of these Bylaws. The IACUC may amend these Bylaws by a two-thirds vote at any meeting at which a quorum is present, providing that all IACUC members are sent notification of the pending vote a minimum of five calendar days prior to the meeting.