Institutional Animal Care and Use Committee  
Clemson University

POLICY #15: INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE (IACUC) POLICY AND PROCEDURES FOR REPORTING AND INVESTIGATING ANIMAL CARE AND USE CONCERNS

REGULATORY AUTHORITY

As outlined in regulations issued pursuant to the Animal Welfare Act and found in 9 CFR § 2.31(c)(4), the IACUC is required to “review, and, if warranted, investigate concerns involving the care and use of animals at the research facility resulting from public complaints received and from reports of noncompliance received from laboratory or research facility personnel or employees.”

The USDA Animal Welfare Regulations provide protection against discrimination or other reprisals for reporting violations of the Animal Welfare Act (“whistleblower protection”). The regulations provide that “No facility employee, Committee member, or laboratory personnel shall be discriminated against or be subject to any reprisal for reporting violations of any regulations or standards under the Act, (9 CFR §.32(c)(4)).”

Purpose: This document describes Clemson University policy and procedures for reporting and investigating animal care and use concerns resulting from perceived noncompliance with applicable laws, policies, and procedures concerning animal welfare developed by the government and the University. Mistreatment of animals is a form of noncompliance and is defined as the physical or psychological, wrongful, abusive or negligent treatment of an animal. Although mistreatment of animals is often what comes to mind when we talk about noncompliance, the broader definition of noncompliance includes any animal use activity not approved by the IACUC. The IACUC will carefully review each report of an animal use concern and if deemed appropriate will investigate.

Policy: Clemson University is committed to the humane treatment of all vertebrate animals used in research and teaching. The privilege to use live animals for the advancement of science and medicine carries with it the responsibility to follow applicable laws, policies, and procedures concerning animal welfare developed by the government and the University.

Procedures: The IACUC posts procedures for reporting concerns about animal care and use in conspicuous locations throughout the campus and on the IACUC website. No facility employee, committee member, laboratory personnel, or student shall be discriminated against or be subject to any reprisal for reporting violations in good faith.

Animal care and use concerns should be discussed directly with the people involved if the complainant is comfortable doing so. If the concern is not adequately addressed, the concern should be taken immediately to the next administrative level or individual’s supervisor. If the concern cannot be handled directly, contact the Office of Research Compliance by one of the following methods:

- Telephone: 864-656-4538
- For written submission of concerns, please use the form available on the IACUC website. Please submit the form via one of these options:
  - Email: iacuc@clemson.edu
  - Mail: 391 College Avenue, Suite 406M, Clemson, SC 29631
In the case of an emergency, please contact the Attending Veterinarian, Dr. John Parrish at: 864-656-1849 or 864-723-0992 immediately. When an animal care and use concern is submitted, the attached flow sheet will be followed and all actions/decisions will be dated on the flow sheet. All animal care and use concerns will be reviewed by the Review Committee (ORC Director, IACUC Chair, and Attending Veterinarian).

If there is potential for immediate harm to animals or humans, the Attending Veterinarian will be notified immediately. If the AV determines the concern is valid, he/she will; 1) resolve the issue locally, or 2) suspend the activity and place the animals under emergency care. All actions by the Attending Veterinarian will be promptly reported to the ORC Director / IACUC Chair and included in the veterinary report to the IACUC.
Animal Concern OR Adverse Event/Unexpected Outcome Incident is received.

- Is there a potential for immediate harm to animals or humans?
  - Yes
    - Report to the Attending Veterinarian
    - Attending Veterinarian (AV) responds and determines if a concern exists. If yes, the AV either:
      1) Resolves issue locally, or
      2) Suspends the activity and places animals under emergency care.
      All actions are:
      1) reported to the ORC / IACUC Chair
      2) included in the veterinary report
  - No
    - Report to the ORC / IACUC Chair

- Was this a self-reported incident that has been resolved locally?
  - Yes
    - Report at next IACUC meeting.
  - No
    - The Review Committee meets (IACUC Chair, Director of Compliance, and Attending Veterinarian). Decisions are determined by a 2/3 vote.

- Is immediate IACUC intervention required?
  - No
    - The classification is determined and reported at the next IACUC meeting.
  - Yes
    - IACUC Chair calls an emergency IACUC meeting to determine necessary action by the committee.

The classification is determined and reported at the next IACUC meeting.

Next IACUC Meeting – ALL CONCERNS ARE REVIEWED

- Appropriate action is taken by IACUC
- Report of action to IO and persons involved the incident
- Report of action to OLAW, APHIS, and/or AAALAC by ORC