Policy Number: 1.5

Policy Title: Reporting and Investigating Animal Concerns

Section 1: Purpose

Animal welfare is the priority of Clemson University’s Animal Care Program. Having a culture where animal concerns can be easily and confidentially reported, promptly investigated, and ensuring corrective/preventive actions are taken is essential to the integrity of our program. This document describes the policy and procedures for reporting and investigating animal care and use concerns resulting from:

- noncompliance with applicable laws, policies, and procedures concerning animal welfare
- the conduct of any animal use activity not approved by the IACUC
- the physical, psychological, wrongful, abusive, or negligent treatment of animals.

Section 2: Scope

This policy applies to all IACUC approved animal facilities, animal activities, and personnel working within Clemson’s animal program.

Section 3: 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.

Whistle Blower Protection

As stated in the University Whistleblower Policy, 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 Concern Submission Procedure

Concerns may be addressed directly with facility management or research personnel if the complainant is comfortable doing so.

If the complainant is not comfortable with attempting to address the concern locally or if not adequately addressed after communicating the concern, the IACUC may be contacted to investigate the issue.
The IACUC can be contacted by:

- email: iacuc@clemson.edu
- IACUC website, which includes an optional downloadable form: https://www.clemson.edu/research/division-of-research/offices/orc/iacuc/reportconcern.html#what_information_is_needed?
- phone: 864-656-4538
- mail: 391 College Avenue, Suite 406, Clemson, SC 29631
- Anonymous reporting: https://www.clemson.edu/research/division-of-research/offices/orc/contact/reportconcern.html

Concerns should include as much information as possible to assist the IACUC in its evaluation of the concern.

If an animal is in immediate danger, contact the Attending Veterinarian (AV) to report the situation. The AV, Dr. John Parrish, can be reached at:

- Office: 864-656-1850
- Cell: 864-723-0992

If the AV determines the concern is valid, he will resolve the issue locally, or suspend the activity and place the animals under his direct supervision. When the AV places animals under his direct supervision, they are considered under “emergency care” and protocol activities may or may not be allowed to continue. All actions by the AV will be promptly reported to the ORC and IACUC Chair and be included in the veterinary report to the IACUC.

An ethics hotline is also available for anonymous reporting of any concerns of misconduct within the University. The hotline can be accessed by calling 1-877-503-7283 (1-877-50FRAUD) or visiting: https://www.lighthouse-services.com/clemson/IncidentLandingPageV2-Clemson.asp.

Animal Concern Evaluation Procedure

All animal care and use concerns will be reviewed by the ORC Director, IACUC Chair, AV, and IACUC Administrator using the flow chart below as a guide. All concerns deemed legitimate will be reported to the IACUC.

The IACUC will assess in accordance with policy 1.6, Reporting and Investigating Unexpected Outcomes or Adverse Events, and/or policy 1.7, Addressing Non-compliance with IACUC Policies or Procedures, as appropriate. Any proposed actions assessed during the IACUC’s review will be determined by majority vote of a quorum of Committee members.

Section 4: References

Clemson University Whistleblower Policy
https://media.clemson.edu/administration/compliance/whistleblowerpolicy.pdf

Animal Care and Use Concern Evaluation Flow Chart

An animal care or use concern is received.

Is there a potential for immediate harm to animals or personnel?

- NO
  Report the event to the ORC Director, IACUC Administrator, IACUC Chair, and AV
  The ORC Director, IACUC Administrator, IACUC Chair, and AV decide if immediate IACUC action is required.
  - No Action Required
  - Action Required
    - The issue will be presented to the committee at the next scheduled meeting.
    - The IACUC Administrator will schedule an unplanned meeting of a quorum of Committee members to discuss the issue.
  The Committee decides if enough information is available to make a fair assessment of the claim.
  - Adequate Information
    - The Committee decides the appropriate response actions
  - Information Needed
    - The Chair appoints a Subcommittee to investigate the issue.
    - The Subcommittee reports findings to the Committee at the next scheduled meeting.

- YES
  Report the event to the AV
  The AV evaluates the situation and determines if an immediate danger exists.
  - No
    - The AV reports findings to the ORC and the IACUC Chair.
  - Yes
    - The AV either:
      - Resolves the issue locally, or
      - Suspends the activity and places animals under his supervision or “emergency care”
    - The AV reports findings to the ORC and the IACUC Chair.
    - The ORC Director, IACUC Administrator, IACUC Chair, and AV decide if immediate IACUC action is required.
      - Action Required
        - The IACUC Administrator will schedule an unplanned meeting of a quorum of Committee members to discuss the issue.
      - No Action Required
        - The issue will be presented to the committee at the next scheduled meeting.
        - The Chair appoints a Subcommittee to investigate the issue.
        - The Subcommittee reports findings to the Committee at the next scheduled meeting.