

Clemson University
Institutional Animal Care and Use Committee (IACUC)

Policy Number: 1.8

Policy Title: Conducting IACUC Business During an Emergency or Pandemic

Section 1: Purpose

The purpose of this policy is to provide guidance for the continuation of IACUC functions during an emergency or pandemic.

Section 2: Scope

This policy applies to situations occurring within the University's animal care and use program where suspected non-compliance with applicable policies and regulations (federal, state, local, or University) is reported.

Section 3: Policy

Regardless of external events, the Office of Laboratory Animal Welfare (OLAW) at NIH expects each institution's IACUC to continue to conduct business according to requirements found in the PHS Policy, the Animal Welfare Act and Regulations, and the Guide. This includes advance planning for conditions that could arise as a result of a human pandemic that could jeopardize the health and wellbeing of animals because of a lack of personnel to care for the animals and/or to conduct IACUC official business.

IACUC

- The IACUC must ensure that protocol approvals are not allowed to expire or if they do expire, that no further animal activities (e.g. data collection) are conducted.
- New IACUC members will not be appointed during an emergency/pandemic unless deemed necessary by the IO.
- IACUC member appointments will not expire during a state of emergency/pandemic. If a member's term is due to expire while the university is under modified business operations, it will automatically continue until the university returns to normal operations.

IACUC Meetings

- The IACUC is required to conduct at least 2 meetings per year, 6 months apart. During modified business operations, efforts will be made to facilitate the conduct of meetings to, at the minimum, meet this requirement.
- If in-person meetings are not possible due to social distancing requirements or other extenuating circumstances, the use of audio/video conferencing is permissible. The IACUC administrator will arrange video conferencing or alternative meeting methods if needed. Meetings utilizing telecommunications will adhere to recommendations in the OLAW guidance, NOT-OD-06-052.

Approved: March 9, 2020
Revised: October 2020
Reviewed: August 2023



(Formerly Policy #37)

Protocol Review

- Review of protocols by Designated Member Review will continue as normal if the university is operating but has enacted social distancing requirements.
- If the university is operating but has enacted social distancing requirements, protocols requiring Full Committee Review will be reviewed at the earliest convened committee meeting (in-person or via teleconference/video conferencing).
- Review of newly submitted protocols or pending protocols will not occur if the university is closed due to an emergency or pandemic.
- If the university is closed and a pending protocol is a renewal of a protocol that currently has animals being housed, a Designated Member Review will continue. If the protocol requires Full Committee Review, the portion of the protocol addressing animal housing will be review by Designated Member Review. When normal operations resume, the review of the full protocol will continue.

Semiannual Facility Inspections and Programmatic Reviews

- The IACUC is required inspect animal facilities twice per year, 6 months apart.
- Every effort will be made to adhere to inspection requirements with the understanding that facility staffing will be limited and work will be prioritized.
- In the event of social distancing requirements, inspection teams will be limited to the minimum required two members.
- There is flexibility in using agents of the IACUC to perform inspections of agriculture animals and non-USDA covered species. This flexibility may be used to complete inspection requirements in the event of an emergency or pandemic. However, facilities housing USDA covered species for more than 12 hours must be inspected by a minimum of 2 IACUC members.
- The Programmatic Review will be conducted every 6 months regardless of the university's closure. Video or teleconferencing may be utilized to conduct the review.
- Inspection and programmatic review results will be provided to the IO as soon as possible.

Flexibilities Granted by OLAW and/or USDA

- If OLAW or the USDA grant flexibilities during an emergency or pandemic, the IACUC Chair, in consultation with the University/Attending Veterinarian and the Director of the Office of Research Compliance, has the ability to enact the specified flexibilities.
- If OLAW or the USDA grant the ability to expand the use of designated member review (DMR) in lieu of full committee review (FCR) during an emergency or pandemic, the Chair, in consultation with the University/Attending Veterinarian and the Director of the Office of Research Compliance, will determine if expanded DMR is warranted on a case by case basis. If justifiable, a protocol that would normally be reviewed by FCR may be reviewed by DMR. Documentation of the reasoning for moving forward with the DMR will be kept in the protocol record.

Animal Facilities

During an emergency/pandemic, animal facilities must be maintained at a level to ensure animal welfare. Each facility must create plans that address appropriate staffing levels, cross training to cover critical operations, and adequate inventories of essential supplies (e.g., feed, bedding, personal protective equipment, cagewash supplies). In the event of emergency/pandemic, it is the responsibility of the facility manager to see that these plans are enacted and carried out. If issues arise, notify the IACUC as soon as possible so that the IACUC and the Institutional Official (IO) can assist in securing needed resources or address any unforeseen circumstances.

Euthanasia of Animals in Response to an Emergency or Pandemic

The euthanasia of animals due to an emergency or pandemic is a last resort and decisions will be made on a case by case basis. If a facility manager or PI feels that euthanasia is warranted, the following procedure should be followed:

1. Prior to the euthanasia of any animal outside of normal protocol endpoints, a request must be submitted to the University/Attending Veterinarian in writing.
2. The University/Attending Veterinarian, in consultation with the IACUC Chair, the Director of the Office of Research Compliance, and the facility manager, will evaluate the situation and decide if euthanasia of study animals is appropriate. Euthanasia should be performed according to the method approved in the AUP or another AVMA acceptable method that has been approved by the University/Attending Veterinarian. The University/Attending Veterinarian will communicate with the facility manager or PI regarding the decision.
3. If euthanasia is deemed necessary, the decision process and resulting procedures must be documented in the animal record, room log or other appropriate historical record and reported to the IACUC as soon as possible. Reports to the IACUC can be in the form of an email to the IACUC Office (iacuc@clemsun.edu) and should include the number of animals euthanized, the ID numbers (if applicable), a detailed justification, the date the University/Attending Veterinarian was consulted, the euthanasia method, and any other information to clearly explain the situation.