

Policy on Investigation of Reported Alleged Deviations and Animal Welfare Concerns

This document establishes the policy of the IACUC regarding the evaluation and investigation of animal welfare concerns, alleged noncompliance, adverse events, and other deficiencies at the University of Kentucky. Specific research requirements that deviate from this document must receive IACUC approval prior to initiating.

Reports of concerns regarding animal welfare may be made by either self-identified or anonymous complainants. All such reports will be reviewed to determine what actions, if any, will be taken. Reprisals or discriminatory actions against complainants are prohibited.

The IACUC Chair appoints a standing Investigative Subcommittee (IS) composed of no fewer than three members, including at minimum one scientific member, the Attending Veterinarian (or designee), and one Office of the Attending Veterinarian (OAV) staff member. Membership is open to all IACUC members (full voting and alternate) and non-IACUC members via appointment by the IACUC Chair. The IACUC Chair may also choose to appoint a separate ad hoc investigative committee for certain events, for example, high profile incidents or programmatic deficiencies. Responsibilities of the IS include assessing the validity of allegations; conducting investigations; developing recommendations for corrective actions; and reporting findings and making recommendations to the convened IACUC.

Incident Reporting

Concerns or incident reports may be submitted directly to the IS, to any IACUC member, DLAR staff member, OAV staff member, or anonymously through a toll-free number. The report should at a minimum include the date the incident was noticed or occurred and a brief description of the incident. If known, the report may also include the relevant IACUC protocol number/Principal Investigator's (PI) name, the involved individual's name (if different than the PI) and contact information.

Upon receipt of an incident report, the individual who receives the information submits a summary of the incident to the IS following established report mechanisms (e.g. e-mail).

The IS chair is responsible for reporting to the IACUC Chair and the Attending Veterinarian (AV) any incident that places animals at immediate jeopardy or harm, and any concerns deemed to require immediate action by the IACUC or the Attending Veterinarian.

Review Procedures

In conducting the review, the IS considers all relevant evidence, which may include a review of pertinent records, observation of animals, consultation with inside or outside

experts, and obtaining additional information from the complainant, animal care staff, and/or protocol study personnel.

If an IS member has a conflict of interest involving any aspect of a report, the member is responsible for disclosing the conflict. The member in conflict does not participate in the review.

The IS may conduct reviews through in person or virtual meetings or via electronic communication. The IS determines whether the entire IACUC needs to review the incident further at a convened IACUC meeting. Incidents which the IS determines do not need convened IACUC review will be noted on the agenda for the convened meeting and captured in the minutes.

Investigation Outcome

The IACUC may review the findings and recommendations from the IS, IACUC Chair or ad hoc committee, and determine whether: 1) a noncompliance occurred; 2) further information is needed; 3) potential sanctions or corrective actions are needed; 4) the incident should be reported to the Institutional Official, and/or to the appropriate regulatory/funding agencies.

The IACUC determines the appropriate course of action and the schedule for correction. The committee's action may include training requirements, documentation of specific activities, counseling, suspension of privilege to use animals, etc. These actions are to be completed according to the correction schedule. After the required discussions/deliberations, the IACUC issues an official letter to the PI or appropriate individual with an investigation summary, the committee's determination, the committee's action, and the schedule for correction.

Any item not completed by the established schedule is brought back to the IACUC for further consideration. A formal motion may be brought forth by the Chair to the committee for vote. This motion may include additional sanctions including the potential for protocol suspension.

Any failure to adhere to the approved plan to resolve a significant deficiency shall be reported to the appropriate regulatory authorities (USDA, PHS-OLAW, AAALAC).

Approved and Adopted by the IACUC:
March 16, 2011

Last Revised: January 18, 2023