

Policy for Reporting and Investigating Animal Welfare Concerns at Thomas Jefferson University

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Institutional Policy

Thomas Jefferson University is committed to expanding our understanding of human beings and their environment, especially their health and diseases, through research. Animal research is an essential component of this research mission. With this commitment comes a responsibility for the highest standards of human care for the animals used by our scientists in pursuit of medical advances. It is the policy of Thomas Jefferson University to conduct animal research in accordance with high ethical standards and to provide a quality animal care and use program which meets these standards.

Role of the Institutional Animal Care and Use Committee (IACUC)

One of the basic functions of the Institutional Animal Care and Use Committee, as specified in the USDA regulations, is to "review and, if warranted, investigate concerns involving the care and use of animals at the facility resulting from public complaints received and from reports of noncompliance received from laboratory or research facility personnel or employees" (9 CFR Part 2, Subpart C, Section 2.31 (c) (4)). Also required under 9 CFR Part 2, Subpart C, is training of personnel in the "methods whereby deficiencies in animal care and treatment are reported, including deficiencies in animal care and treatment reported by any employee of the facility." The institution should have established procedures for reporting, receiving and handling allegations of animal mistreatment or other noncompliance.

Definition of Mistreatment and Non-Compliance

Mistreatment is the physical or psychological, wrongful, abusive or negligent treatment of an animal. This is a broad definition and clearly grey areas exist which the IACUC must interpret carefully. Fortunately, it is rare that mistreatment is intentional. Noncompliance means the failure to follow approved procedures or policies whether stemming from confusion, misunderstanding or ignorance. There are areas of overlap between mistreatment and noncompliance, and the procedures for handling both are similar.

Reporting Allegations

Allegations of mistreatment or noncompliance may be reported at any time by anyone associated with the university. There are no restrictions on who can report an alleged incident and no threat of reprisals allowed against those reporting mistreatment or noncompliance. Employees are encouraged to report incidents of animal welfare concerns through the supervisory chain of command if they are comfortable doing so. The veterinary staff of Animal Resources are responsible for overseeing the humane care of laboratory animals and will act promptly on any concerns brought to their attention.

Frequently the attending veterinarian, animal care personnel and investigators can work together to prevent or correct problems. However, serious or repeated problems always demand the involvement of the IACUC.

A variety of ways may be used to report allegations of mistreatment or noncompliance. These may include conversations with, or letters to, members of the IACUC, the veterinary staff or the Institutional Official who is the President of the University. Whatever the route, the information must be quickly relayed to the chairman of the IACUC.

IACUC Responses to Complaints

Ideally, all complaints brought to the IACUC's attention will be fully documented and signed. This does not always occur, and judgment must be used to evaluate the significance of undocumented complaints. Whatever the case, the allegation must have sufficient substance for the chairman to proceed further. An allegation has no substance until proven, and shall remain confidential to the extent possible to protect all concerned. If a complainant has openly identified him/herself, it is appropriate that receipt of the allegation be acknowledged. The IACUC will decide the level to which they wish to keep the complainant informed during the investigation.

IACUC Procedures for the Investigation of a Complaint

- The chairman of the IACUC is responsible for organizing a prompt investigation of a complaint.
- The IACUC as a whole or a subcommittee will be appointed to investigate the complaint. In all cases, the results of an investigation must be presented to all members of the IACUC and all members must have the opportunity to present minority views.
- All persons involved must be informed of the purpose of the investigation and the manner in which it will be conducted. Those to whom the complaint is addressed must have an opportunity to explain their side of the issue.
- As much documentation as is reasonably needed will be collected. Interviews and inspections of facilities may be needed. In some cases it may be necessary to review animal receiving records, housing and health records, billings, memos and other written materials.
- The results of the investigation will be thoroughly discussed at a full IACUC meeting and a determination of a course of action, if indicated, be agreed upon through majority vote of the committee. In each case written documentation of conclusions and recommendations must be made by the IACUC.

A report of the findings and recommendations shall be submitted in writing to the President of the University. The process of investigations and imposition of sanctions or disciplinary actions are subject to pertinent laws and regulations and university policies related to these issues. This includes assurances of due process, appeal procedures and confidentiality. The Institutional Official is ultimately responsible for taking corrective action.

Institutional Responses

This is influenced by legal requirements, institutional policy and the nature of the investigative finding. If the violation is verified by the IACUC, then the IACUC is empowered under USDA Regulations and PHS Policy to suspend a previously approved project. If the activity is supported by PHS funds, the IACUC through the Institutional Official must file a full report to OPRR. In cases where there is sufficient evidence of serious non-compliance, it may be prudent for the IACUC to suspend an activity pending the outcome of a full investigation. In these cases, a preliminary report shall be sent to OPRR, through the Institutional Official, with a promise of a full report upon completion. The Institutional Official in consultation with the IACUC, has the power to impose further sanctions on an investigator found responsible for mistreatment or non-compliance.

Portions of this policy extracted from: Institutional Animal Care and Use Committee Guidebook, 1992, Office for Protection Against Research Risks - National Institutes of Health (OPRR-NIH), Applied Research Ethics National Association (ARENA).