



I. Purpose

Ross University School of Veterinary Medicine (RUSVM) expects all of its animal facilities and programs to maintain the highest standards of animal care and use, and conform to applicable local and U.S. federal laws, regulations, policies and guidelines. Safeguarding animal welfare is the responsibility of every individual associated with the Institutional Animal Care and Use Program. In accordance with the Guide for the Care and Use of Laboratory Animals, the Institutional Official (IO) and the Institutional Animal and Care Committee (IACUC) at RUSVM are responsible for review and investigation of animal welfare concerns. Response to such reports include communication of findings to the concerned colleague(s) and student(s) unless such concerns are reported anonymously; corrective actions if deemed necessary; and a report to the IO of the issue, findings, and actions taken. Reported concerns and any corrective actions taken are documented.

II. Scope and Responsibilities

This policy applies to all colleagues and students of RUSVM and any concerned member of the St. Kitts community. This policy is in agreement with nondiscrimination against the concerned/reporting party, and protection from reprisals. Federal Requirements Regarding the Reporting of Animal Care and Use Concerns: USDA – Animal Welfare Act (9 CFR) Ch1 Part 2 - Subpart C 2.32:

No one shall be discriminated against or be subject to any reprisal for reporting violations or standards under the Act.

III. Procedures

1. How to report animal welfare concerns should be shared by the Principal Investigator (PI)/Course Coordinator in all facilities where animals are used for research or teaching.
2. Any individual may confidentially report their concerns in writing to:
 - a. Institutional Animal Care and Use Committee (IACUC) [Chair or any member of the committee]
 - b. The University's Institutional Official (IO)
 - c. The Attending Veterinarian (AV)
 - d. Anonymously through the whistleblower boxes located near the mailboxes, student union, and security post 1.



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3. The report is documented by whoever receives the report and within 24 hours of receiving the report, the IACUC chair is informed.
4. IACUC chair actions
 - a. Contacting the PI directly which may resolve the concern immediately and rule out any misunderstandings.
 - b. If warranted, the IACUC Chair or AV will immediately initiate an investigation.
 - c. If the health of an animal is in jeopardy, the AV is authorized to stop any activity until the IACUC can be convened to consider the matter formally. The IACUC should notify the IO and proceed accordingly.
 - d. Situations that may involve potential criminal activity or human safety should be reported promptly to RUSVM Security and/or EH&S
5. Investigations
 - a. The IACUC should conduct further investigation as required. It is important to avoid any actual or perceived conflicts of interest in this process. If a complaint is lodged against an IACUC member, that member shall recuse themselves from all proceedings concerning that complaint.
 - b. All investigations should be conducted in a timely manner after the IACUC chair receives the complaint. The IACUC must provide a reasonable and credible explanation for any delays. Interviews should be conducted promptly and all on the same day, if possible, to increase the likelihood of obtaining the most accurate first-hand information.
 - c. All investigations are to be handled with confidentiality.
 - d. The IACUC chair should charge a designated person or group to lead the investigation. The composition of this group can vary depending on the nature of the complaint but generally should include IACUC members, course coordinators, and other institutional representatives as needed. Either the IACUC chair, co-chair and/or administrator should always be a part of the investigative subcommittee or the sole designee. The whistleblower is not a part of the investigative team, they serve as a witness.
 - e. The investigators will collect information in a fair and professional manner and all involved persons equally consulted. The nature of the information required varies depending on the circumstances, but often involves:
 - Interviewing whistleblowers (if known), any persons against whom allegations were directed, and pertinent program officials. All individuals identified as having knowledge of facts relevant to the complaint should be interviewed.



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- During the interview, the investigators should remind persons to respect the confidentiality and privacy concerns of all individuals involved in the complaint.
 - Interviews should be carefully documented objectively.
 - Observing the animals and their environment.
 - Reviewing any pertinent records (animal health records, protocols, etc).
- f. All information obtained during the investigation is then presented to the IACUC at a regular meeting. In an emergency an immediate meeting may be called. During this meeting, the IACUC should review:
- The concern(s)
 - The results of interview(s)
 - The condition of animals and their environments
 - The results of records and other document reviews
 - any supporting documentation such as correspondence, records, photos, etc.
 - Relevant requirements of the Animal Welfare Regulations, the PHS Policy, Assurances, the *Guide*, Saint Kitts and Nevis regulations, and/or institutional policies and procedures.
 - Recommended actions, if appropriate.
- g. Upon receipt of the report the IACUC may request further information or decide that:
- There was no evidence to support the complaint.
 - The complaint was not substantiated but related aspects of the animal care and use program or existing policies and procedures require further review.
 - The complaint was valid and further recommendations for remedial action consistent with faculty and academic policies and procedures are required.
6. Possible IACUC recommendations
- a. If non-compliance is found, the IACUC's first step, if possible, should be to find a way to bring the protocol into compliance. If allegations of animal mistreatment, non-compliance, or misconduct that threatens animal welfare is found, the IACUC can apply sanctions.

A clearly minor and unintentional misinterpretation of an IACUC policy that created no problem for an animal is an example of a verified allegation of non-compliance could result in an explanation, not a sanction.



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- b. If the IACUC determines that policies have been violated, it may recommend actions for individual people including but not limited to specific training, counseling, letters of reprimand, supervision during animal work, restricted animal access, no animal access (permanent or temporary, pending training), to recommendation of dismissal. When determining the severity of a sanction, the committee should consider if the individual **knowingly** and **intentionally** performed actions that jeopardized the welfare of animals.
- c. The IACUC is empowered to suspend any protocol and/or an individual's access to the use and care of animals if it finds violations of RUSVM policies, PHS Policy, the *Guide*, Assurance, or Animal Welfare Regulations. Suspension may only occur after review of the matter at a convened meeting of a quorum of the IACUC, with a vote for suspension by a majority of the quorum present.
- d. All potential disciplinary action must be reviewed on a case-by-case basis by analyzing factors for consideration and the unique circumstances surrounding the specific employee's conduct and employment history. Factors for consideration include:
 - The attitude of the individual
 - The actual injury or damage sustained to animals, persons, property, or research,
 - Whether the misconduct is habitual or the employee is likely to repeat the misconduct,
 - The potential injury or damage that could have resulted from the complaint.
 - Whether the person had received appropriate training.
- e. Disciplinary decisions must be based on just-cause principles, and the employee must be provided with due process (a chance to review the evidence, to respond, and to appeal).
- f. Examples of conduct that may result in termination include, but are not limited to:
 - Intentional physical or psychological mistreatment of animals. Examples include but are not limited to:
 - Deliberately injuring or neglecting an animal,
 - Use of unnecessary force,
 - Purposeful deviation from protocol or policy that jeopardized animal welfare.
 - Falsification or fabrication of research or animal care documentation.



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- Intentional or reckless conduct that results in potential harm to research or the safety of or welfare of animals or employees through the disregard for SOPs and/or policies.
 - Repeated instances of identical or substantially similar conduct that previously resulted in discipline, retraining, or suspension of animal handling privileges.
7. Post-investigation procedures
- a. The IACUC's findings and recommendations shall be reported to:
 - The IO, through the chair.
 - The individual who is the subject of the complaint as well as details regarding the appeal process
 - Any relevant funding or regulatory agencies will be notified, as required.
 - If known, the whistleblower should be alerted of the outcome in a way that respects the appropriate privacy rights of the complaint (such as sharing the findings of the complaint but not sharing details of the sanctions).
 - b. When necessary, the IO or the IO's designee may notify the individual's first-line supervisor or manager, who is responsible for notifying HR of any misconduct. The supervisor and HR representative will also receive the IACUC recommendations and retain the right to implement further sanctions but cannot reduce IACUC's recommendations.
 - If the individual is a student, the course coordinator (if relevant) and student experience team should be notified in lieu of the supervisor and HR.
8. Once the individual receives the IACUC's investigation report and recommendations, they have 5 business days in which to respond in writing to indicate either 1) agreement with the IACUC's decisions and intention to meet all corrective actions requested; or 2) propose an alternative training plan when appropriate or 3) an intent to file an appeal.
- a. If the respondent requests changes in the training plan, the reason behind each change should be indicated and how the proposed changes address the areas identified as needing strengthening described. The IACUC will review the requested change(s) and in consultation with the IO and AV determine if they can be implemented.

IV. Appeal Process

1. The IACUC's decision may be appealed by the individual within seven calendar days of the date of the receipt of the formal communication from the IACUC committee. Such appeals shall be in writing. Receipt of the outcome letter is presumed to be the date it was hand



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delivered or the date of electronic transmission (for email). The results of the appeal shall be final.

2. Once the individual files an intent to appeal, they have seven calendar days to provide any additional evidence and alternative explanations to the IACUC committee. The IACUC committee will form an Appeal subcommittee that includes the IO and other representation external to the IACUC as needed. The appeal shall be limited to review the meeting minutes from the applicable IACUC meeting, documents considered during the meeting and any new evidence and documentation submitted by the respondent. The subcommittee will have 3 business days to review the case before meeting with the respondent for no longer than 1 hour who can make their case in person and the panel can ask questions. After this meeting the subcommittee will have two business days to provide a response.

V. Review

This SOP is subject to bi-annual review.

SOP Approval:

Signed
Dr. Jennifer Ketzis, IACUC Chair

Date



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SCHOOL OF VETERINARY MEDICINE

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