Guidelines for Determining when IACUC Oversight is Required for Research and Teaching Pol.015

Activities that Require IACUC Approval:

Institutional Animal Care and Use Committee (IACUC) approval is required before conducting research and teaching activities involving animals if ANY of the following categories apply:

Activities are to be conducted:
- with animals owned or leased by Ross University School of Veterinary Medicine (RUSVM)
- with free-living vertebrate wildlife if studies involve more than unobtrusive observation of animals in their natural habitats. Examples include invasive studies and studies with the potential to cause harm or materially alter the behavior of the animals
- by RUSVM employees in their official roles as faculty or staff members
- on property owned, leased, or managed by RUSVM
- using internal or external funds administered through RUSVM

Teaching and research activities, including clinical trials, conducted with privately owned animals must be reviewed by the IACUC.

Any Research or Teaching protocols conducted in collaboration with another Institution or organization, including commercial entities, must be approved by an IACUC or equivalent Oversight Body. Where applicable, i.e., protocols with Animal Use activities outside of Saint Kitts and Nevis, the Principal Investigator (PI) must ensure that any required additional approvals or permits from local and/or national authorities/regulatory bodies have been obtained and is noted on the IACUC application form.

When a research or teaching protocol has been reviewed and approved by another Institution’s Oversight Body the RUSVM IACUC may not require an additional approval from the RUSVM IACUC. However, the PI must submit the following to the RUSVM IACUC for documentation and acknowledgement of Animal Use Activities before any Animal Use Activities under the protocol can commence: 1) Protocol approved by other Institution’s Oversight Body, 2) The Oversight Body’s approval letter and where applicable 3) either a) Additional local/national approvals or permits or b) Assurance statement from the PI that no other approvals or permits are necessary for the protocol. After review of the submitted documents, the RUSVM IACUC will issue an acknowledgement letter for the protocol stating it will assent to the other institution’s Oversight Body’s approval.

Examples of situations in which the RUSVM IACUC may assent to another Institution’s Oversight Body approval include:
- sub-contracts using funds disbursed through RUSVM, where animal use is conducted at the collaborating institution
- custom (i.e., not “off the shelf”) antibody production by a commercial company
- custom animal testing of a compound supplied by a RUSVM employee
Activities that Do Not Require IACUC Approval:

IACUC approval is NOT required for veterinarians affiliated with RUSVM to train veterinary students, residents, or interns in the course of delivering clinical veterinary services.

IACUC approval is NOT required for use of animal-derived data when the investigator or his/her personnel did not intentionally participate in producing the data, either via activities or funding. For example, previously collected data from clinical cases may be used in retrospective studies without IACUC approval.

Research and teaching activities using cadavers or tissues from dead animals do NOT require an Animal protocol UNLESS the cadavers or tissues are to be acquired from animals specifically purchased or euthanized for the activity, or the recipient will influence the timing or method of euthanasia and/or the timing or method of tissue/sample collection. The PI must submit a Notification for Collection of Samples and Tissues on the applicable IACUC form. The IACUC Chair will review and send an acknowledgement to the PI noting collection of samples.

Examples of situations that do not require an IACUC protocol, but a Notification for Collection of Samples and Tissues include use of:

- unused or discarded carcasses when the recipient has no influence over the timing or method of euthanasia
- unused or discarded clinical samples
- slaughterhouse tissues when the animal was not slaughtered specifically for the activity
- archival tissues from tissue banks, museum collections or similar sources

Use of unused or discarded clinical samples can be a “grey” area. IF extra are collected to ensure for a sufficient amount for the research, then an IACUC protocol submission and approval is required. For example, if typically 0.5 mL of blood is collected for a clinical test and extra is collected for research, then an IACUC protocol and approval is required.

Student participation in educational or research activities at non-RUSVM sites does NOT require a RUSVM IACUC protocol UNLESS those activities involve animals owned by RUSVM or RUSVM personnel influence (ie, conduct or direct) animal use. If students will serve as project personnel on specific research projects, IACUC approval by RUSVM and the collaborating institution(s) would be required.

Some journals have requirements for ethical reviews for animal use that are not required under the USDA Animal Welfare Act and hence do not normally fall under the remit of IACUC. In these cases, protocols can be submitted to IACUC for review and/or for a letter from IACUC confirming that welfare is not an issue in the proposed work.

NOTE: For any inquiries regarding animal use activities, IACUC protocol submission, protocol review process or other related matters, please contact the Ross University School of Veterinary Medicine IACUC Administration Office.
This Policy is subject to annual review.

Policy Approval:

Signed

Date