



# The ACC Connection

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**WELCOME** to the 14<sup>th</sup> edition of the **ACC Connection**, a bi-monthly newsletter designed to help researchers with questions regarding animal research at the University of Connecticut Health Center. Our 14<sup>th</sup> issue is designed to help animal researchers understand how to report any animal welfare concerns or issues of non-compliance regarding laboratory animal use.

The Health Center's Animal Care Committee (ACC) is committed to the humane care and use of laboratory animals. To ensure that laboratory animals receive humane care and use or treatment in accordance with the highest ethical standards, laws, regulations, and policies governing animal research, the ACC must review and, if warranted, address any animal-related concerns submitted by the general public or University of Connecticut Health Center employees.

## Regulations

PHS Policy requires the ACC to "review concerns involving the care and use of animals at the institution" and the *Guide for the Care and Use of Laboratory Animals* states that the ACC is responsible for "establishment of a mechanism for receipt and review of concerns involving the care and use of animals." The Animal Welfare Act requires training of personnel who are involved in animal care or treatment including "methods whereby deficiencies in animal care and treatment should be reported." The Animal Welfare Regulations require each facility to provide the methods whereby any individual can report deficiencies in animal care and treatment. The Animal Welfare Regulations also require the ACC 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."

In addition, the Animal Welfare Regulations state that "no facility employee, committee member, or laboratory personnel shall be discriminated against or be subject to any reprisal for reporting violations of any regulation or standards under the Act."

## Origins of Concerns or Complaints

Some common sources of concerns or complaints can include:

**Animal care and use personnel**- these individuals have been instructed to report perceived deficiencies in animal care or use to the attending veterinarian and the ACC.

**Other personnel**- all individuals of the Health Center have an obligation to report perceived deficiencies in animal care and use or potential non-compliance with an approved protocol to the ACC.

**Employee Non-compliance Hotline**- the Health Center has an anonymous hotline to which reports can be made. The number is 1-888-685-2637.

**Public**- public individuals are most likely to direct complaints to senior institutional officials who should promptly forward them to the ACC chair or coordinator.

**Media**- stories appearing in newspapers, magazines, and on television or radio may contain or evoke concerns about animal care and use. These reports should be evaluated by the ACC and, when appropriate, proactively address them.

## Assuring Animal Welfare

Assuring laboratory animal welfare involves a partnership among various groups- in particular, the Institutional Official (IO), the IACUC (ACC), the attending veterinarian, and the investigators. Ultimately, assuring humane animal care and use lies with the institution but is hard to achieve if all individuals involved with animal care and use (research staff, animal care staff, and veterinary care staff) do not contribute to this shared goal.

PHS Policy and the Animal Welfare Regulations place a strong emphasis for responsibility on management at the senior level and on the use of an IACUC as an oversight committee. The ACC at the Health Center works closely with animal users, animal care staff, and the attending veterinarian to assure the humane care and use of laboratory animals.

There are various ways the ACC oversees the compliance with respect to the use of laboratory animals:

**Acquisition and Tracking-** the ACC and CLAC have established mechanisms to monitor and document the number of animals acquired and used in approved activities. Tracking animal usage becomes more challenging when investigators maintain breeding colonies; therefore, it is essential that investigators use the granite program fully and appropriately fill out and return the annual animal report sent to PIs by the ACC office.

**Protocol Reviews-** the ACC has the ability to perform reviews of animal care and use protocols to ensure compliance with the approved protocol.

**Semi-annual Inspections-** every 6 months, investigator laboratories are inspected to ensure compliance with federal, state, and institutional laws, regulations, and policies.

**Health Center Staff-** research, veterinary, and husbandry staff should be aware of approved procedures in animal care and use protocols when they have a responsibility for those animals. It is essential to maintain a collegial environment in which staff can discuss apparent departures from approved protocols with the investigator; this will facilitate compliance and lead to the correction of deviations. Staff must also be free to report perceived deviations to the ACC which must then consider these reports.

**Reporting of Adverse Events-** all PIs, and the attending veterinarian, are responsible for reporting all adverse events to the ACC (refer to the [ACC Policy on Reporting Unusual or Unexpected Morbidity and Mortality](#)). This provides the ACC, and the institution, with a method of identifying deficiencies in procedures, faults in study design, or the need for additional personnel training.

**Review of Publications-** much of the research performed at the Health Center is eventually published. The ACC may choose to review some published descriptions of animal use to verify that work was done according to the approved protocol.

**Post-approval Monitoring-** the ACC has the ability to monitor any protocol that has been approved to ensure that procedures are being performed as described in the protocol document (refer to the [ACC Policy on Post Approval Monitoring](#)).

## How to Report Animal Welfare Concerns or Concerns of Non-Compliance

Letter-sized posters outlining how to report animal care and use concerns are available and posted throughout the Health Center. They can be found in the main department offices and on each floor where animal rooms are located. The ACC has an approved policy for reporting animal welfare concerns which can be found on the website: <http://clacc.uchc.edu/ACC/Policies/RepCons1.htm>. People can report their concerns to the Animal Care Committee Office (email at [ooacac@uchc.edu](mailto:ooacac@uchc.edu) or by phone at x4129), the ACC chair, the Institutional Official, or any member of the ACC. Reports of animal welfare concerns may be made anonymously, if desired. However, if the complainant would like to know the resolution of the investigation, they must provide a name. All reports will be handled confidentially, although anonymity cannot be guaranteed. The Health Center's policy regarding the reporting animal welfare concerns is subject to the UCHC Whistle Blower's Protection Policy which can be found on the UCHC website: <http://facultycouncil.uchc.edu/Joint%20Issues/WhistleblowerProtectionJun.htm>.

When alleged incidences of non-compliance are reported to the ACC, these incidences will be investigated with the utmost concern for confidentiality and due process without compromising the welfare of the animals. If the incidence directly involves animal health and safety, the CLAC veterinarian will assess the health and well-being of the animal(s) and will verify the concern. If there is animal suffering, the veterinarian will take immediate action, including supportive

care or euthanasia. While a good faith effort will be made to contact the PI, the immediate animal welfare situation may necessitate that immediate action be taken without the PI's knowledge.

Once the animal(s)'s welfare is assessed and addressed, or in those situations where animals are not directly involved, the alleged concern or issue will be investigated by an ACC subcommittee. This subcommittee will usually consist of the ACC chair, the ACC coordinator, the attending veterinarian, and another member of the committee. This subcommittee will typically initiate an investigation within 5 working days of receiving the report. All final reports will be brought to a meeting of the ACC for review by the full committee. It is the responsibility of the ACC to review the concern, determine appropriate action, communicate with the PI involved, and follow-up on any corrective action plan.

Once the subcommittee informs the ACC of the results of the investigation, the ACC- via the chair- will inform the PI and the Institutional Official of the results of the investigation. The Institutional Official will then, if necessary, inform the NIH Office of Laboratory Animal Welfare, the USDA Animal and Plant Health Inspection Service, and the grant institution.

If the complainant disclosed their name, s/he will then be contacted by the ACC coordinator with the results of the investigation. If allegations of misuse of laboratory animals or non-compliance with federal, state, or institutional policies or regulations have been established by the investigation, the potential consequences to the involved individual(s) may include issuing letters of reprimand, mandatory retraining of personnel, increased monitoring of protocols by the ACC, suspension of animal protocol(s), termination of animal protocol(s), permanent withdrawal of ACC approval to use laboratory animals, and / or recommending to the IO that institutional sanctions be imposed.

The ACC may determine, in the course of its evaluation of the complaint, that violations of non-animal-related institutional policies and procedures or local, state, or federal statutes, regulations, or laws may have occurred (e.g., scientific misconduct, misuse of monies, fraud, theft, etc). In such cases, those findings would be reported to the Office of Research Compliance for their consideration.

## Suspension of Protocols

In exceptional circumstances, the findings of the ACC investigation result in the suspension of an animal care and use protocol. The Animal Welfare Regulations and PHS Policy charge the ACC with the authority to suspend an activity involving animals because of animal welfare concerns or non-compliance with the approved protocol. The decision to suspend a protocol may be reached by a majority vote of a convened meeting of a quorum of the ACC. In rare circumstances, when there is a clear threat to animal health, the attending veterinarian has the authority to suspend animal activities on a protocol. In addition, the institutional official also may suspend an activity in the case of serious or continuing non-compliance with the ACC approved protocol or governmental law or regulation, misuse or mistreatment of research animals, or previously unanticipated risk to the laboratory research personnel. In all circumstances, the PI will be notified by phone or email by the chair of the ACC, the attending veterinarian, or institutional official within 24 hours of this action being taken. The PI will also receive a letter from the ACC stipulating the actions taken by the ACC, attending veterinarian, and/or institutional official. This letter will usually contain a description of actions prospectively to be taken as a result of the ACC meeting following the suspension of activities.

## Frequently Asked Questions

### *How does the ACC get the authority to watch over my animal care and use protocols once they are approved?*

The Animal Care Committee, which is an IACUC, gets its authority from federal law. It is mandated by the Health Research Extension Act of 1985 and the Animal Welfare Act. One federally-mandated responsibility of an IACUC is to evaluate complaints of animal welfare, misuse, or non-compliance.

### *Will the PI have a chance to participate in the investigation process?*

Absolutely. All individuals involved in an animal welfare or non-compliance investigation will have the ability to speak with the ACC subcommittee. This type of involvement is necessary in order for the ACC to investigate the complaint properly.

### *Does the PI have the right to challenge the actions of the ACC?*

Yes and No. If the result of an investigation is a suspension of a protocol, the PI may not perform any animal-related work on that protocol until the protocol approval is reinstated by the ACC. The PI has the right to respond, in writing, to any sanction imposed by the ACC as a result of the investigation. However, unless sanctions are lifted as a result of the PI response, all sanctions must be adhered to by the PI and his/her research staff.

## Upcoming Training, May 2008 – June 2008

### New Animal Users Initial Basic Core Training

Monday, May 19  
Monday, June 23

9:00 am – 12:00 pm  
9:00 am – 12:00 pm

Building 20 conference room  
Building 20 conference room

## New Institutional, State, or Federal Regulations

### Institutional

None

### State

None

### Federal

None



## Next Issue: What you need to do to use animals

### CONTACTS

ACC Coordinator / Research Compliance Monitor  
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Interim Attending Veterinarian  
AVP for Research Administration / Institutional Official  
Animal Facility Supervisor  
Biological Safety Officer  
Director, Research Compliance  
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