NU–IACUC POLICY

Northeastern University Institutional Animal Care and Use Committee

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| Reporting Deficiencies in Animal Care and Use |

*Re-Approval Date: 03/23/2022*

## Background:

The Laboratory Animal Welfare Act is a public law administered by the U.S. Department of Agriculture that includes standards for the care and use of animals in research, testing, and teaching. The Act requires research facilities to ensure that all scientists, research technicians, animal technicians, and other personnel involved in animal care, treatment, and use are qualified to perform their duties. The training provided by the research facility must also include information on the methods personnel may use **to report deficiencies in animal care or use** at the institution.

## Citation:

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| “Training and instruction of personnel must include guidance in …methods whereby deficiencies in animal care and treatment are reported, including deficiencies in animal care and treatment reported by any employee of the facility. No facility employee, Committee member, or laboratory personnel shall be discriminated against or be subject to any reprisal for reporting violations of any regulation of standards under the Act.”  Animal Welfare Act. 7 U.S.C. 2131 *et seq.*  Section 2.32 Personnel qualifications |

General:

The Northeastern University institutional policy requires that animal care and use conform with all applicable federal, state and local laws, regulations and policies, including the 8th Edition of the “Guide for the Care and Use of Laboratory Animals”. Principal investigators are responsible for insuring that their respective staffs practice proper procedures and techniques. Certification of compliance with University policy is provided when the Institutional Animal Care and Use Committee (IACUC) protocol form is signed and submitted for review and approval.

Any University student or employee observing any apparent deficiency in animal care or use is encouraged to report such practice as outlined below. Federal laws, as well as the University’s Whistleblower Policy, prohibits any discriminatory or reprisal measures being taken against any student or employee for reporting deficiencies in animal care or use. Northeastern University intends to protect, to the greatest extent possible, the privacy of an individual who is in good faith reports an apparent deficiency.

Reporting Procedures:

Reporting of deficiencies in animal care and use can either be done directly to DLAM/IACUC personnel or anonymously online or via telephone. Any student or employee who observes an apparent deficiency in animal care or use should take the following steps:

To Report Deficiencies in Animal Care and Use Directly to DLAM/IACUC Personnel:

1. Note the date, time, location and species of animal involved.
2. Report the information by telephone, email, mail, or in person to:

Director-DLAM IACUC-Chairman Institutional Official

Sean M. Sullivan Or Dr. James Monaghan Or Dr. David Luzzi

12 Mugar Building 134 Mugar Building 525 Building 177

[s.sullivan@northestern.edu](mailto:s.sullivan@northestern.edu) [j.monaghan@northeastern.edu](mailto:j.monaghan@northeastern.edu) [d.luzzi@northeastern.edu](mailto:d.luzzi@northeastern.edu)

(617)-373-3955 (617)-373-6539 (617)-373-2129

1. Provide a complete description of the act, personnel involved and observed circumstances. This description must contain sufficient details to allow proper assessment by the staff person receiving the complaint.

To Report Deficiencies in Animal Care and Use Anonymously:

Reporting deficiencies in animal care and use can be reported anonymously via Northeastern’s Anonymous & Confidential Reporting Hotline. This site allows persons to report anonymously online or via phone. To use the site, please follow the following steps:

1. Go to the Anonymous & Confidential Reporting Hotline page: (<https://secure.ethicspoint.com/domain/media/en/gui/32115/index.html>) and either click the “Make a Report” tab on the top of the page or call the call toll free hotline at 855-350-9390.
2. When you click “Make a Report” tab, it will bring you to another page where you will click the “**Research Misconduct**” tab.
3. This will bring you to a form that you will need to complete.

Review Procedures:

1. All reports of deficiencies in the care or use of animals will be reviewed and, if warranted, investigated by representatives of the IACUC.
2. The reporting of deficiencies will be documented at the time by the staff member receiving the report, either using the written report of the person reporting the incident or writing a report of the conversation. Reports submitted via the Anonymous & Confidential Reporting Hotline page will be presented to Sean Sullivan, Richard Melloni, and David Luzzi.
3. An initial evaluation of all reports involving deficiencies in care or use will be completed by the DLAM Director, or the IACUC Chairperson. Such evaluation may involve reviewing any relevant protocols on file and interviews with the principal investigator and/or involved research personnel. If the DLAM Director or the IACUC Chairperson finds that the reported incident was within the limits of an approved protocol for the research involved, then that determination will be reported to (and documented in the minutes of) the IACUC. No further action will be taken.
4. If the DLAM Director or the IACUC Chairperson, determines that further action is indicated, then a written report of the incident and the subsequent findings will be made to the IACUC, with a copy to the investigator’s Department Head, Research Administration, the Director of DLAM and the Institutional Official. Further steps may be taken by the IACUC, if deemed necessary, which may include:

* Meeting between the IACUC members and principal investigator/personnel involved to review the incident and to discuss necessary changes.
* Training, retraining, and reprimand to personnel involved.
* Temporary/permanent restriction on the use of animals in research by personnel involved.
* Report personnel involved to appropriate authorities (i.e. USDA, OLAW).
* Remand to the appropriate process if determined to be a case of misconduct in research.

1. The Committee intends to provide the individual alleged to have engaged in deficiencies in animal care or use with:

* Confidential treatment, to the extent possible.
* A prompt, thorough and impartial review, and, where the Committee deems appropriate, investigation.
* An opportunity to comment and refute allegations and findings of the review and/or the investigation.