Handling and Reporting of Concerns

The SDSU Program of Animal Care and Use includes procedures for reporting and investigating apparent problems and issues related to animal welfare and animal procedure-related personnel safety, and follow up with appropriate actions to prevent similar subsequent problems. Examples of such issues are cited in the <u>February 2005 Guidance Notice (NOT-OD-05-034)</u> issued by the Office for Laboratory Animal Welfare (OLAW).

<u>Reporting of Animal and Personnel Welfare Concerns by Any Concerned Individual</u>
Any individual working in or around animal care and research facilities at SDSU is obligated to report concerns about apparent problems involving animal welfare and animal procedure-related personnel safety promptly (within 24 hours).

Report of concerns can be made:

- anonymously via the Division of Research Affairs website or;
- by contacting:
 - o the IACUC Chair;
 - o the Director of Research Affairs/ Institutional Official Representative;
 - o the Attending Veterinarian;
 - o the Research Facilities and Operations Director or;
 - o any IACUC member.

Signs listing personnel to contact with concerns regarding animal care and use are posted in all animal facility hallways and by the entries and exits of the animal facilities and any satellite facility where animal procedures are performed. There is no requirement that the concern be submitted in writing and all complaints (anonymous or otherwise) will be investigated.

Investigating Reported Concerns

Upon knowledge of a concern, the IACUC Chair will form a subcommittee to investigate the reported concern within 3 business days. The subcommittee will include the IACUC Chair, the Attending Veterinarian, the Director of Research Affairs, and any other appropriate individuals deemed necessary. Any serious concerns will be reported immediately to the Institutional Official. The subcommittee will present its findings to date to the IACUC at either the next convened meeting or a special convened meeting, as necessary.

If the issue involves noncompliance with federal regulations or the institutional program, the IACUC will assess whether the issue of noncompliance is deemed reportable and/or recurring (i.e., any serious or continuing noncompliance with the PHS Policy; any serious deviation from the provisions of the Guide; any serious deviation from the provisions of the USDA Animal Welfare Act Regulations; or any suspension of an activity by the IACUC).

If the noncompliance appears to be reportable or recurring, the IACUC subcommittee will assess the information available to determine if there is an elevated risk of harm to animals or personnel working with animals, and recommend corrective action to the IACUC. The

IACUC Chair will then communicate the concerns and action plan to the Principal Investigator via a written report summarizing the concerns and corrective action required. A summary of the findings will be communicated to the person initiating the review, if identified. The IO will also be notified. If warranted, reports are provided to OLAW, APHIS and/or funding agency(s).

If the incident associated with noncompliance extends beyond the IACUC's jurisdiction, the IACUC chair will inform the Institutional Official.

Non Retaliation

San Diego State University prohibits any retaliatory action against individuals who, in good faith, report concerns regarding compliance, or cooperate with an investigation or corrective action. Every effort will be made to ensure the reputation of anyone unfairly accused is not damaged or is restored.

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