

## **Addendum to Whistleblower and Investigation Procedures: Animal Welfare Concerns**

Adoption Date: 11/2022

**PURPOSE:** This statement is an addendum to the WNE Whistleblowing Policy found in the Exempt Employee and Non-Exempt Employee Handbooks, and is meant to provide a fair and objective procedure for examining and resolving concerns for animal welfare and process alleged violations as expeditiously as possible without compromising responsible resolutions, maintaining confidentiality to the extent permissible under federal and state laws, and protecting the rights and legitimate interests of both the person making the disclosure of violation and the subject(s) of investigation.

**POLICY:** WNE is obligated under the Animal Welfare Act and the Public Health Service Policy (PHS) to ensure that all animal research conducted at WNE is carried out in a humane and appropriate fashion. Concerns regarding animal welfare can be reported in confidence to the Office of the Provost (IO) which does not have to identify the complainant. No member of the University community (faculty, staff, or student) will be discriminated against or subject to reprisals for reporting possible violations of animal care standards.

**INVESTIGATION PROCESS:** Upon receipt of the report, a pre-screen will be performed by the IACUC Chair and two selected members of the IACUC (Institutional Animal Care and Use Committee) will determine whether a full investigation is warranted. If an investigation is necessary, a subcommittee will be formed of members of the IACUC. The Chair normally oversees the investigation but if the concerns are directed against the Chair, then the investigation will be led by a member appointed by the Institutional Official.

At any time, the Chair and the Consulting Veterinarian can take immediate action if research activities are taking place that are not approved by an IACUC protocol; these actions can include immediately advising the PI to take corrective actions and/or halting a research activity. If the Chair or the Attending Veterinarian decides to suspend a research activity, then this decision must be immediately communicated to the IACUC.

If a full investigation of the concern(s) is performed, IACUC will inform all persons involved in the investigation about the nature of the complaint. The results of a full investigation must be shared with the full IACUC in a timely manner at a convened meeting of the full IACUC at which a quorum will be present. At this meeting, the IACUC will determine subsequent actions that are required, including notifications or reporting required (e.g., suspensions of protocols need to be reported to OLAW and/or USDA).

If the complaint is determined to be valid, the following categories of actions are possible:

- Project suspension
- Protocol modifications required
- Additional training required
- Increased IACUC oversight

If a report was not made anonymously, the person submitting the initial concern should be given a report of the outcome of the IACUC investigation.

WNE IACUC Representatives

Sheralee Tershner, PhD, Chair of IACUC

Stephanie Bacon, MS DVM, IACUC Consulting Veterinarian