

# Reporting & Investigating Animal Welfare Concerns



“Safeguarding animal welfare is the responsibility of every individual associated with the Program. The institution must develop methods for reporting and investigating animal welfare concerns, and **employees should be aware of the importance of and mechanisms for reporting animal welfare concerns.**”

(pg. 23, Guide for the Care and Use of Laboratory Animals)

## 01 >> WHY REPORT

As a public research university, we have been entrusted with ensuring that no animal is used needlessly and that animals are spared all unnecessary pain and distress.

It is critical that **every** individual involved with animal care and use at the University of Michigan (U-M) acknowledges that they have an active role to play in upholding the highest animal welfare standards at all times, and in all circumstances.

Wanton disregard for these policies and standards can have direct, adverse effects on animal health and well-being, and may jeopardize the entire institution’s continued privilege of using animals in research, testing, and teaching.

Together, we must commit to building and sustaining a culture of shared responsibility and accountability for the conduct of responsible research. As such, **any** member of the faculty, staff, student body, or public having reason to question the treatment of animals at U-M should report **any** suspected cases of animal abuse, misuses, or mistreatment.

## 02 >> HOW TO REPORT

As a general rule, routine (non-emergency/non-criminal) compliance concerns that **DO NOT** require immediate veterinary attention should first be reported to your direct supervisor or manager. They are often in the best position to answer questions and take immediate action.

If you don’t feel comfortable raising a concern with this individual (either because your concern relates specifically to them or you have previously told them about a concern that has not been remedied), **there are several other ways you can report your concern:**

- ➔ Report the issue through the **Animal Concern Hotline** ([animalcare.umich.edu/hotline](http://animalcare.umich.edu/hotline) • [acuoffice@umich.edu](mailto:acuoffice@umich.edu) • 734-763-8028)
- ➔ Report the issue through the **U-M Compliance Hotline** ([compliance.umich.edu](http://compliance.umich.edu) • [compliancehotline@umich.edu](mailto:compliancehotline@umich.edu) • 866-990-0111)
- ➔ Discuss your concern with one of the mediation services available at U-M, such as **Mediation Services for Faculty and Staff** ([oie.umich.edu](http://oie.umich.edu)) or the **University Faculty Ombudsman** ([facultyombuds.umich.edu](http://facultyombuds.umich.edu))

Bookmark the noncompliance policy on Animal Care A-Z ([animalcare.umich.edu/noncompliance](http://animalcare.umich.edu/noncompliance))

Questions? Contact the Animal Care & Use Office ([acuoffice@umich.edu](mailto:acuoffice@umich.edu))

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## 03 » REPORTING PROTECTIONS

**Anonymous reports are acceptable, and all are investigated.**

U-M is committed to safeguarding the confidentiality of individuals who submit good faith reports, and the identity of anyone making a report is held in the strictest confidence. However, please keep in mind that certain types of reports may be difficult for the university to pursue if you choose to remain anonymous.

The Animal Care & Use Program adheres to federal mandates which 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 [Animal Welfare] Act.”*

The Institutional Animal Care & Use Committee (IACUC) also observes U-M’s [Standard Practice Guide \(SPG\) #601.90 – Protection from Retaliation](#) which, *“prohibits retaliation against any member of the University of Michigan community who in good faith reports or participates in an inquiry or investigation into Wrongful Conduct.”*

Any member of the U-M community or general public can report concerns about discrimination or retaliation via the resources described in SPG #601.90, or through the Animal Concern Hotline ([animalcare.umich.edu/hotline](http://animalcare.umich.edu/hotline)).

## 04 » ALLEGATION & REPORT ASSESSMENT

Individual allegations and reports submitted to the IACUC for investigation are routed to the Animal Care & Use Office (ACUO). **Upon receipt of an allegation:**

- The IACUC Chair, ACUO Director, and Attending Veterinarian will perform a preliminary assessment to determine if a report is credible and/or meets the definition of **serious noncompliance**.
- If at least one member of the preliminary assessment group determines that the allegation or report is credible – or meets the definition of serious noncompliance – then a formal inquiry process will be initiated.
- If animals are determined to be at risk, immediate action to resolve the issues will be taken, which may include confiscating or removing the animals from the PI’s control.
- Certain situations may also necessitate suspension of animal activities until a formal inquiry/investigation has been completed.

***Serious noncompliance** is any noncompliant event that has a negative impact on the welfare of an animal and/or human, and/or is in direct conflict with federal standards governing animal activities, including provisions of the Occupational Health & Safety Program.*

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## 05 » INQUIRY PROCESS

During the inquiry, an ACUO staff member gathers relevant details about the allegation and summarizes that information for a subset of the IACUC known as the ACUP Compliance Committee (ACC).

The ACC includes – at minimum – the IACUC Vice-Chair, a non-affiliated IACUC member, and at least one other faculty scientific IACUC member. If allegations include a safety or hazardous materials component, a member of Environment, Health and Safety will be added as an ad hoc consultant to the ACC.

The staff member may communicate, as needed, with the PI, their animal users, the Unit for Laboratory Animal Medicine, and/or any other relevant individual(s).

The ACC reviews the report to (1) determine if the available evidence/information is sufficient for proceeding to an IACUC investigation and, when necessary, (2) develop a recommendation to the IACUC. **If an IACUC investigation is to occur, the ACC will also determine whether the PI will be required to attend the IACUC meeting to explain the circumstances and/or discuss possible resolutions to the problem.**

In addition, the ACC may ask others (e.g., faculty, research technicians, animal care staff, and/or students) to attend the meeting to provide information.

## 06 » INQUIRY FINDINGS

**During a convened meeting of a majority of IACUC voting members, the ACC will present its inquiry findings.**

If the IACUC determines an allegation is noncompliance and/or a program deficiency, the committee will identify the appropriate corrective actions to be taken, as outlined by the [Policy on Investigating Noncompliance & Animal Welfare Concerns](#).

## 07 » POLICY & CORRECTIVE ACTIONS

The cornerstone of this policy is a three-step corrective action escalation process pertaining to the investigation, and confirmation of, noncompliance and animal welfare concerns reported within the U-M research community.

This process has been summarized in the *Policy on Noncompliance Information Sheet* (available on Animal Care A-Z at [animalcare.umich.edu/noncompliance-info-sheet](http://animalcare.umich.edu/noncompliance-info-sheet)).

**Actions taken to minimize occurrences of noncompliance will be based on the seriousness of the incident and/or the number of incidents that occur on all protocols under the direction of a PI.**

All members of the U-M animal care and use community should review, and be familiar with, the complete *Policy on Investigating Noncompliance & Animal Welfare Concerns* (available at [animalcare.umich.edu/noncompliance](http://animalcare.umich.edu/noncompliance)).

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*Since PIs are ultimately responsible for ensuring that their animal activities are conducted in accordance with governing standards and their IACUC-approved protocols, the IACUC will direct any relevant correspondence and actions directly to the PI.*

## 08 » OUTCOME REPORTING

Once the investigation is complete, an ACUO staff member will provide formal notification to the PI.

**This correspondence will summarize the findings of the IACUC and, when applicable, provide IACUC-implemented corrective actions.**







The IACUC, through U-M's Institutional Official, will provide a prompt, full explanation of the circumstances and actions as a written report to AAALAC, OLAW, and the USDA, as applicable.

## WHERE TO LEARN MORE

### U-M Resources

-  [Policy on Investigating Noncompliance & Animal Welfare Concerns](#)
-  Helpful Information Sheet:  
[Policy on Noncompliance & Reporting Animal Welfare Concerns](#)
-  Animal Concern Hotline webpage ([animalcare.umich.edu/hotline](http://animalcare.umich.edu/hotline))
-  Animal Concern Hotline Flyer ([animalcare.umich.edu/hotline-flyer](http://animalcare.umich.edu/hotline-flyer))
-  U-M Compliance website ([compliance.umich.edu](http://compliance.umich.edu))
-  U-M SPG Policy Statement on Protection from Retaliation ([spg.umich.edu/policy/601.90](http://spg.umich.edu/policy/601.90))

### External Resources

-  USDA Animal Welfare Act and Animal Welfare Regulations ([2017](#))
-  Guide for the Care and Use of Laboratory Animals ([Eighth Edition](#))
-  Public Health Service Policy on Humane Care and Use of Laboratory Animals ([2015](#))
-  Guidance on Prompt Reporting to OLAW under the PHS Policy on Humane Care and Use of Laboratory Animals Notice ([NOT-OD-05-034](#))
-  State of Michigan: Whistleblowers' Protection Act Information ([PDF](#))
-  State of Michigan Law/Statutes: Whistleblowers' Protection Act ([PDF](#))

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