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.

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

01 WHY REPORT

As a public research university, we have been entrusted with the obligation to ensure 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 very 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 • acuoffice@umich.edu • 734-763-8028)
- Report the issue through the U-M Compliance Hotline (compliance.umich.edu • 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) or the University Faculty Ombudsman (facultyombuds.umich.edu)
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 an anonymous report is held in the strictest confidence. However, you should keep in mind that certain types of reports may be difficult for the university to pursue if you choose to remain anonymous.

If you act responsibly and report what you believe to be a legitimate concern or violation, you should never experience harassment or retribution.

Federal laws prohibit discrimination or reprisal for reporting violations of standards and regulations promulgated under the Animal Welfare Act.

Individual allegations and reports submitted to the Institutional Animal Care & Use Committee (IACUC) for investigation are routed to the Animal Care & Use Office (ACUO).

The ACUO then initiates an ACUP Compliance Committee (ACC) Assessment. 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 or inquiries 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.

Upon receipt of an allegation:

- The ACC will perform a preliminary assessment and provide a summary of the allegation to the IACUC Chair, ACUO Director, and the Attending Veterinarian (AV).
- 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.
- If at least one member of the ACC determines that the allegation or report is credible, or meets the definition of serious noncompliance, then a formal inquiry process will be initiated.

**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.

Bookmark the noncompliance policy on Animal Care A-Z (az.research.umich.edu/animalcare)

Questions? Contact the Animal Care & Use Office (acuoffice@umich.edu)
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, in accordance with the Policy on Investigating Noncompliance & Animal Welfare Concerns.

The action is then formalized through a motion and committee vote.

The cornerstone of the Policy on Investigating Noncompliance & Animal Welfare Concerns 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 on the Policy on Noncompliance Information Sheet (available on Animal Care A-Z at 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).

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

Bookmark the noncompliance policy on Animal Care A-Z (az.research.umich.edu/animalcare)
QUICK REFERENCE: WHAT YOU SHOULD KNOW

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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.

INVESTIGATION & OUTCOME REPORTING

Once the investigation is complete, the ACC will work with the Animal Care & Use Office to 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 promptly (i.e., within 30 days) provide a full explanation of the circumstances and actions as a written report to AAALAC, OLAW, and the USDA, as applicable.

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)

Animal Concern Hotline Flyer (animalcare.umich.edu/hotline-flyer)

U-M Compliance website (compliance.umich.edu)

U-M SPG Policy Statement on the Integrity of Scholarship (spg.umich.edu/policy/303.03)

External Resources


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