

**IACUC POLICY DOCUMENT**  
**UNIVERSITY OF SAN FRANCISCO-SAN FRANCISCO, CA**

(Revised: October 2024)

Institutional Animal Care and Use Committee (IACUC) | Office of the Provost

**Policy Document**

University of San Francisco (USF) regards the use of animals in research and teaching to be an integral component of continued progress in science and education. USF expects all of its animal facilities and programs to maintain the highest standards of animal care and use, and to be operated in accordance with applicable federal, state, and local laws, regulations, policies, and guidelines.

**Authority**

The USF Institutional Animal Care and Use Committee (IACUC) derives its authority from the law. The Health Research Extension Act (HREA) of 1985 and the Animal Welfare Act of 1966 mandate the existence of IACUCs. The laws require the Chief Executive Officer (CEO) of an organization to appoint the IACUC, whose responsibilities are delineated in the law as well as federal policy and regulations. The Office of Laboratory Animal Welfare (OLAW) considers the CEO to be the highest operating official of the organization. The President of the University of San Francisco has delegated authority to the Institutional Official (IO) to appoint and remove individuals to and from the IACUC on an annual basis.

The Vice Provost for Student Success, Inclusive Excellence and Curricular Innovation shall serve as the IO and is given the administrative and operational authority to commit institutional resources to ensure compliance with the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals, Animal Welfare Regulations (AWR) and other requirements.

The IACUC's mandate to perform semiannual program evaluations as a means of overseeing the animal care and use program puts the IACUC in an advisory role to the IO. In its semiannual reports the IACUC advises the IO of the status of the Institution's compliance, establishes plans and schedules for correcting deficiencies necessary to either maintain or achieve compliance, and makes recommendations to the IO regarding any aspect of the Institution's animal program, facilities, or personnel training.

The IACUC's authority to review and approve protocols is independent of the IO, who may not overrule an IACUC decision to withhold approval of a protocol. If the IACUC approves a protocol, however, the Institution is not required or obligated to conduct the research activity. The Institution may also subject protocols to additional institutional review (e.g., department head, Biosafety committee, etc.).

## COMMITTEE MEMBERSHIP AND OVERSIGHT

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Within the recommendations of AWA 2.31, b2 and PHS policy IV, A, 3, b, the USF IACUC will be composed of a minimum of 5 voting members that fill specific categories that represent the interests of animals at the institution, within the community, and from a veterinary-medical perspective. All IACUC members will be appointed by the IO.

Voting membership of the USF IACUC includes:

**Chair:** The IACUC Chair is an appointed faculty member with research experience.

**Veterinarian:** The veterinarian with program responsibility (e.g., Attending Veterinarian) has training or experience in laboratory animal science and medicine or in the care of the species being used.

**Scientist:** The IACUC Scientist will be a practicing scientist experienced in research involving animals.

**Nonscientist:** The IACUC Nonscientist will be a USF-affiliated member whose primary concerns are in a nonscientific area. Examples include, but are not limited to, ethicist, lawyer, member of the clergy, librarian, etc.

**Non-affiliated:** The IACUC non-affiliated member represents general community interests. They (nor their immediate family) should have any affiliation with USF. These members have equal status (e.g., voting) to every other committee member and are provided the opportunity to participate in all aspects of IACUC functions.

**Health & Safety Professional:** While not required by OLAW, a USF-affiliated staff member with expertise in occupational health and lab safety will be part of the IACUC. This staff member will provide administrative support and assist the chair in executing protocol review, reporting, and compliance.

The IO will consider persons with expertise in the disciplines involved in institutional research and teaching programs for service on the IACUC. In addition to the required categories of membership, the IO will seek to appoint individuals with expertise in specific areas pertinent to protocol review and program oversight (e.g. statisticians, occupational health experts, information resource specialists, animal health technicians, and scientific research staff).

**Alternate members** may be appointed to the IACUC by the IO. Alternates will receive training identical to the training provided to regular IACUC members.

## SEMIANNUAL PROGRAM REVIEW AND FACILITY INSPECTIONS

(Revised: October 2024)

### **Semiannual Review**

The IACUC reviews the program for humane care and use of animals at least twice annually, using the *Institutional Animal Care and Use Committee Guidebook* as the basis for evaluation. The IACUC also inspects all institutional animal facilities at least twice annually not to exceed 195 days between inspections.

### **Program Review**

The animal care and use program review includes an evaluation of institutional policies and responsibilities (lines of authority and reporting channels), IACUC membership and functions, and IACUC recordkeeping and reporting procedures.

The IACUC will review at least twice annually, USF's program for humane care and use of animals, using the Guide as a basis for evaluation.

The IACUC procedures for conducting semiannual program reviews are as follows:

The IACUC reviews USF's animal care and use program using the OLAW Program review and facility inspection checklists, as found at: <https://grants.nih.gov/grants/olaw/sampledoc/cheklist.htm>. Each program area is evaluated and any deficiencies are categorized as minor or significant. No member is excluded from participating in any portion of the program review.

The semiannual program review is conducted at and voted on at a convened IACUC meeting. The results for the review must be signed by a majority of IACUC members. The report is submitted to the IO.

### **Facility Inspection**

The facility inspections are a physical inspection of all buildings, rooms, areas, enclosures and vehicles that are used for animal confinement, transport, maintenance, breeding, or experiments inclusive of surgical manipulation. USF, through the IACUC, is responsible for all animal-related research, testing, teaching, and production activities. The IACUC must have reasonable access to these areas for the purpose of verifying that activities involving animals are being conducted in accordance with the proposal approved by the IACUC. Advance notification will be given to all supervisory personnel prior to semiannual facilities inspection.

The IACUC inspects, at least twice annually, all of USF's animal facilities using the Guide as a basis for evaluation. The IACUC procedures for conducting semiannual facility inspections are as follows:

1. Semiannually the IACUC organizes the inspection schedule of the animal facilities located on campus. These inspections are conducted using the *Institutional Animal Care and Use Committee Guidebook*, the *PHS Policy on Humane Care*, the *Guide for the Care and Use of Agricultural Animals in Research and Teaching*, and *Use of Laboratory Animals*, as a basis for evaluation. Deficiencies are categorized as minor or significant. All IACUC members are invited, and encouraged, to attend the facility inspections. At a minimum, two (2) members are present for each inspection. Any member wanting to be present at an inspection may be accommodated, but cannot be part of the inspection team when a COI exists.

2. A responsible party (e.g., Principal Investigator, hereinafter referred to as PI) is notified, in writing, of any minor or significant deficiency identified in his/her laboratory, facility or designated space. Responsible parties are required to promptly provide a response to the deficiency notification with a description of how the deficiency has been corrected or to submit a written plan with a timeline outlining how the deficiency will be corrected.
3. Facility Inspection notes are compiled by the IACUC members present at the facility inspection and shared at a convened IACUC meeting where the Chair requests any additional comments and/or minority views from all members present.

**Categories to be inspected:**

Areas of inspection may include, but are not limited to:

- Sanitation
- Food and water provisions
- Animal identification
- Waste disposal
- Animal health records
- Controlled and/or expired drugs
- Environmental conditions
- Occupational health and safety concerns
- Staff training
- Physical security requirements

**Performing Inspections**

Adherence to the following recommendations will assist the IACUC in performing inspections:

- The IACUC maintains an updated list of all facilities.
- All proposals submitted to the IACUC will specify locations where animal procedures will be performed.
- Apparent deficiencies will be discussed with the person in charge of the facility to ensure that the IACUC's perception of the situation is accurate.

**Deficiency Correction Schedule**

All deficiencies identified during the Facility Inspection and/or Program Review are designated by the IACUC as minor or significant. A significant deficiency is defined as a situation that is or may be a threat to animal health or safety.

For both categories of deficiencies, a reasonable and specific plan and schedule with dates for correction must be included in the final report. All individuals to be involved in the corrections should be consulted to ensure that the plan is realistic. An individual will be identified at the meeting following the inspection to follow up and verify completion of deficiency correction.

**Documentation**

A written report of the semiannual program review and facility inspection will be prepared and signed by a majority of the IACUC.

The report will indicate whether or not any minority views were filed, and minority views will be included in the final document. A copy of the report will be sent to the IO and kept on file for a minimum of three years in the Office of the Provost.

## Reporting Animal Welfare Concerns

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### Procedures for Handling Reports of Animal Welfare Concerns

- Any report of an immediate threat to animal welfare will be addressed without delay.
- Any individual may report concerns to the IO, IACUC Chair, Institutional Veterinarian, or any member of the IACUC.
- Notices are located in the animal facilities and on the IACUC web-site advising individuals how and where to report animal welfare concerns and stating that any individual who, in good faith, reports an animal welfare concern will be protected against reprisals.
- All reported concerns will be recorded and brought to the attention of the full IACUC.
- If necessary the IACUC Chair will convene a meeting to discuss, investigate, and address any reported concern.
- Reported concerns and all associated IACUC actions will be recorded within the IACUC meeting minutes.
- The Committee will report actions to the IO and, as warranted, to OLAW. Reports to the IO may be either via meeting minutes, semiannual report of IACUC evaluations, or separate letter. Reports to OLAW will be in writing and through the IO. Initial reports to both the IO and OLAW may be made verbally.

### Regulatory Authority

The Whistleblower Act protects public employees who make good faith reports of violations of law by their employer to an appropriate law enforcement authority. An employer may not suspend or terminate the employment of, or take other adverse personnel action against, a public employee who makes a report under the Act.

## MONITORING OF APPROVED PROTOCOLS

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### Continuing Reviews

USF IACUC protocols are active for three years. Some research projects may extend beyond this window, and ongoing research will require a *de novo* review, as specified in IV.C. of the PHS. The IACUC requires third year resubmissions to be submitted as renewal protocols, using the most recent version of the application.

The three-year period begins on the actual date of IACUC approval; the IACUC may not administratively extend approval beyond the three years. Since the protocol approval period cannot be extended, investigators must be cognizant of the protocol approval period. It is the responsibility of the investigator to submit the third-year resubmission by the appropriate deadline date for a scheduled Full Committee Review (FCR) prior to protocol expiration.

In order to address the federal requirement that significant changes be reviewed by the IACUC (*The IACUC Handbook 3<sup>rd</sup> Edition*, 10.3), a new protocol submission is required for the following:

- Addition of survival surgeries
- Changes in the purpose or aim of the study
- Change of PI
- Need to repeat an experiment utilizing more animals (on a case by case basis)

### Post-Approval Monitoring/Continuing Reviews

Each approved IACUC protocol will be subject to an Annual Continuing Review before the first and second anniversary of its initial approval date.

No later than 2 months prior to the anniversary of the IACUC protocol approval date, the IACUC will send the IACUC Continuing Review form to the PI of the approved protocol, asking for a progress report, if any adverse events have occurred, a record of animal use, if changes are planned, or to certify that the project is finished and may be closed. It is requested that the PI complete the progress report and return it to IACUC within 7 business days, and it will be discussed at the next IACUC meeting. The IACUC determines if the project still falls under its originally approved activities, or if a new protocol is required. CITI Training and OHP enrollment is re-verified during the Continuing Review. Should the PI not respond to the initial requests for their CR report, their Department Chair and Dean will be contacted. Should a PI not submit the form for review or revisions in time for approval, the protocol will be closed and a new one will be required before activities can be resumed.

Before the third anniversary of an approved IACUC protocol, an expiration notice will be sent by IACUC, notifying the PI that a new protocol is required to continue their activities if the project is ongoing.

## TRAINING

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### **Training**

Prior to working with animals, all faculty, staff, and students working with animals must be appropriately qualified to do so in order to ensure the humane treatment of animals. Training is a classic performance standard where the emphasis is on the outcome (i.e., all personnel are qualified to do their jobs). On the job training for those not working directly with animals, but just in the vicinity, for example individuals performing maintenance tasks under the supervision of an animal facility employee, will suffice for reasonable tasks within animal spaces.

Meanwhile, all faculty, staff, and students working on animal protocols must understand the purpose of the IACUC and the key concepts of Replacement, Refinement and Reduction. Although the PHS Policy and Animal Welfare Regulations (AWRs) do not specify a particular program or the frequency with which a program should be offered, the requirement for competence is mandatory.

For those working on research protocols, the USF IACUC has chosen to require the following courses available via the Collaborative Training Initiative (CITI): *Working with the IACUC*, or *Wildlife Research*, based on the type of work to be done. Members of the IACUC will also take the *Essentials for IACUC Members* course.

These training certificates are valid for three years following the completion date, at which time the faculty, staff, and students working on the research protocol will be required to retake the course to remain eligible to continue working with animals.

The AWRs, in Sec. 2.32 (a) and (b), specify:

It shall be the responsibility of the research facility 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. This responsibility shall be fulfilled in part through the provision of training and instruction to those personnel. Training and instruction shall be made available, and the qualifications of personnel reviewed, with sufficient frequency to fulfill the research facility's responsibilities.

Personnel shall receive training in the recognition and alleviation of animal pain, distress, and abnormalities. Similarly, training in the conduct of animal procedures prepares staff to work without causing unnecessary harm to the animal. Technical proficiency also invokes reduction by avoiding wasted animal lives through failed procedures.

### **Who Should Receive Training?**

All personnel should receive training if they interact directly with or work in the vicinity of animals.

For training purposes, staff can be grouped as:

- Researchers (including Principal Investigators)
- Animal care technicians
- Other (e.g., maintenance or support staff)

In some instances, staff may not be clearly divisible into these groups if job responsibilities are more diversified than this classification suggests. For example, facility staff such as animal

health technicians may have job functions that include both animal care and research procedures. Training should also be made available to temporary staff, such as students and visiting scientists. PI's are responsible for identifying these people and assuring that appropriate training is accomplished. Approvals will only be granted once the PI and personnel listed on protocols have completed the required training.

### **Education and Training for IACUC Members**

New IACUC member orientation consists of the following: a description of the IACUC and responsibilities; U.S. Government Principles; criteria for membership; authority of the IACUC; protocol review process; continuing reviews of approved protocols, protocol modifications; records; semiannual reviews; roles and responsibilities; and federal regulations. A copy of the *Guide for the Care and Use of Laboratory Animals* is distributed to new members, and they are required to take the additional training module, *Essentials for IACUC Members*.

The objectives of providing this information are the following:

- To introduce members to the role of the IACUC and its evolution
- To provide the basic information necessary for IACUC members to discharge their responsibilities
- To provide a forum for response to, and discussion of, members' concerns and questions

## Appendix A: Emergency and Disaster Plan for Animal Facilities (HR 255)

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**SCOPE:** Preparation for and response to possible disasters that may impact the program of animal care or animal facilities.

### **Reason for this Plan:**

The University of San Francisco (USF) is committed to ensuring that vertebrate animals used in research are treated in a humane, ethical manner, with the highest standard of care according to federal, state, and institutional regulations and policies. This plan is intended to provide USF's Institutional Animal Care and Use Committee (IACUC), faculty, staff and students, a general plan of action in the event of an emergency or disaster with potential impact to the animals housed on campus.

The intent of this plan is to protect and manage the animals on campus in the event of an emergency. However, under no circumstances should employees put themselves at risk at any time in attempting to implement animal protection procedures.

This plan supplements the campus-wide USF Emergency Plan. All personnel should follow the procedures in the USF Emergency Plan and use this plan as a supplement to specifically address vertebrate animal needs in the event of an emergency.

## **OVERVIEW OF ANIMAL CARE & SUPPORT NEEDS**

### **Animal health checks and health maintenance:**

Animals should be checked daily to confirm they are healthy. These observations may be performed by qualified Animal Facilities personnel or other qualified personnel. The Attending Veterinarian will triage sick or injured animals and determine a treatment plan. Animals that cannot be relocated or protected from the consequences of the disaster should be humanely euthanized. When appropriate, animals will be euthanized at the discretion of the Attending Veterinarian or designee using current American Veterinary Medical Association (AVMA) approved methods of euthanasia.

### **Food and water supplies:**

Food and water are critical to maintaining animal health. Having the appropriate food for the species and research needs, in adequate quantities and unadulterated form, is one goal of this plan. If the usual food is not available, professional judgment must be applied to identify acceptable substitutes which are available. Potable water is especially important, as many animals can survive for several days with little food, but may succumb within 1-2 days without water.

### **Sanitation:**

For purposes of animal health, animal welfare and support of research, adequate sanitation must be provided. Aquariums of some species must be changed often while others may go several days without inducing health or environmental problems. The goal of this plan is to approximate normal sanitation schedules with available resources. Increasing aquarium change intervals, spot cleaning instead of aquarium changes. The USF Attending Veterinarian or IACUC Chair will decide which sanitation activities are performed in order to provide the greatest benefit to the animals if it is not possible to perform all normal activities due to disaster/emergency conditions

**Environmental support (ventilation, temperature control, utilities):**

Maintenance of an appropriate environment is essential to the well-being of animals and for many research projects. Ventilation problems may include loss of or diminished air supply or exhaust, loss of pressure differentials in critical areas, unacceptable temperature variations, contamination with agents such as chemicals or smoke, or loss of utilities such as electricity needed for lights or powered equipment (e.g., hoods, autoclaves, ventilated racks). Ventilation problems should be addressed by the USF Attending Veterinarian and Facilities personnel with goals of maintaining at least some air movement in animal housing spaces, sustaining air pressure differentials in all rooms including the barrier area, and keeping temperatures as close to the acceptable range as is possible. The minimal standard is to prevent animal deaths or contamination of the environment.

**Personnel to provide animal care:**

Personnel with adequate training are essential to maintaining animal colonies. They may be unable to work in facilities due to damage or dangerous conditions, physical obstructions (flooding or chemical spill nearby), or interruption of work (bomb threat, picketing, etc.). The IACUC Chair or designee will deploy available personnel to maintain animal health and well-being under the direction of the Attending Veterinarian or designee. Personnel may be asked to perform duties outside the scope of their normal responsibilities in order to protect animal health or well-being. The Attending Veterinarian or designee and Animal Facility administrative personnel make this decision. As soon as possible after a disaster or prior to the incident, when possible, a list of current/essential personnel that may need to access campus and the animal facilities will be provided to the USF Public Safety dispatch so they may further distribute it to local, state or federal authorities that may control access, including road closures.

**EVACUATION OF ANIMALS:**

Disaster preparedness can mean the difference between undue loss and suffering of animals, which can compound trauma to human victims, and successful evacuation and care for both people and animals. Safe evacuation of all people from the designated area is the common goal for all responding agencies.

USF does not have a back-up facility specifically prepared to evacuate all animals in the event of an emergency. In consultation with the Attending Veterinarian and IO, evacuation will be considered based on the details of the disaster, type of animal, and feasibility of evacuation or relocation. If evacuation of the animals (which may not be practical) is being considered to avoid the hazard, evacuation procedures, places and routes should be followed. In the event relocation is required, the animals will be moved to another on-campus location temporarily or an off-campus site if necessary. If animals will not be evacuated following a disaster, animals will be euthanized under the guidance of the Attending Veterinarian.

In the event of a catastrophic emergency, injured or affected animals will be triaged by trained animal care personnel (veterinarians, research investigators and/or research staff). Treatment will occur on site if possible or after evacuation to a predetermined area/site. Those animals with injuries too severe to recover will be humanely euthanized. After an evacuation of personnel, the responsible person should report to USF Public Safety (415) 422-2911 and then work with USF Public Safety to determine when it is safe to return to the area with the animals.

**SHELTERING-IN PLACE**

The term “shelter-in-place” means to seek immediate shelter and remain there during an imminent event instead of evacuating. There are occasions when the option to evacuate the area cannot be considered. Unless otherwise instructed to evacuate, sheltering in a predetermined safe location is the preferred method of safely waiting out events. Proceed calmly to the location designated for the building you are located in. Windows, doors and HVAC systems in the designated area should be closed.

A second definition of “Sheltering in Place” may be used to describe when animal care personnel decide in advance to come to or remain in the facility for longer than a normal shift. For example, when extreme weather is predicted which may prevent transportation or limit access to the animal facility to provide care as required by federal law, the Animal Facility Supervisor and Attending Veterinarian, or designee, will coordinate to ensure that someone is available to care for the animals. Since events like this allow time for planning, the IACUC Chair and Attending

Veterinarian, or designee will ensure that personnel support supplies such as food, water and bedding are available for the individual(s) remaining at the facility. If such a decision is made, the IACUC Chair or Attending Veterinarian will notify USF Public Safety of the exact area where personnel remain; this is especially important when the University is “closed.”

Generally, the amount of food kept in-house is projected to be an adequate supply to allow for any potential delays in shipment. Loss of power will be managed with redundancy. In the event that such a situation is likely during the workday, the IACUC Chair or designee will closely monitor weather conditions. Animal Care staff will be reassigned work tasks to assure that all critical tasks are completed (feed, water, security of animals) and then nonessential personnel will be sent home (timing to be consistent with recommendations from weather bulletin sources). For after-hours emergencies, Animal Facility staff should call USF Public Safety.

**HVAC LOSS:**

If HVAC systems fail within the buildings where animals are housed, efforts will be made to maintain temperature and air flow within animal facilities using portable fans, heaters, or air conditioners. If the animal room environment cannot be maintained using these means, the animals may need to be relocated or euthanized under direction of the Attending Veterinarian.

**Overheating:**

- 1) Move animals to areas that are not overheating or to the hallway if it is cooler.
- 2) If the entire animal facility is overheating, mobile cooling stations can be utilized to reduce the heat load.
- 3) If animal rooms cannot be cooled, the Attending Veterinary (or designee) will make the decision to relocate or euthanize the animals if they are in distress.

**Loss of Heat:**

- 1) Move animals to rooms that have heat or to the hallways if it is warmer.
- 2) Use auxiliary heaters in animal rooms that have no heat.
- 3) If animal rooms cannot be warmed or there is no warm place within the animal facility, the Attending Veterinarian will make the decision to relocate or humanely euthanize the animals if they are in distress or danger.

**ANIMAL RIGHTS ACTIVISTS: PROTESTS / PICKETING**

In the event of protests or picketing (by animal rights groups, for example), animal facility personnel are to report to work as usual. In doing so, they are to avoid confrontations if they pass through picket lines or protest marchers. USF Public Safety will handle the dissemination of information and address questions about research activities. USF Public Safety will handle all security related issues, and will increase security measures for all animal housing and support facilities while helping keep all facilities secure.

- 1) Animal health checks: If the number of employees on site is decreased, priority is given to activities which directly affect animal health and welfare: health checks and treatments, feeding, watering, and maintaining minimal sanitation requirements.
- 2) Environmental support: Environmental systems are not expected to be affected. If the environment is altered, as by sabotage, for example, the specific problem will be addressed as described in earlier sections.
- 3) Personnel: USF personnel are expected to report to work. USF personnel may be required to perform duties outside their usual responsibilities in order to preserve animal health. The Attending Veterinarian or designee will adjust duties as needed.

**EMERGENCY CONTACT INFORMATION & RESOURCES:**

FOR EMERGENCIES AND DISASTERS SUCH AS FIRE, FLOOD, CHEMICAL SPILLS, SECURITY, ETC.

- University of San Francisco Public Safety, Fire Department, Ambulance: (415) 422-2911
- Lab Safety Manager (Craig Conforti): (510) 219-8104
- Vet-on-Call (Freeland Dunker): (650) 255-2509
- Facilities Management: (510) 422-6464
- IACUC Chair (James Sikes): (415) 422-6367