

IACUC POLICY ON UVA FIELD STATIONS

The Institutional Animal Care and Use Committee (IACUC) at the University of Virginia (UVA) requires all individuals utilizing vertebrate animals for research or teaching to have an animal care and use protocol approved by the IACUC prior to beginning work involving vertebrate animals as described below. The vast majority of animal studies at the University of Virginia are conducted on laboratory animals. However, the same general principles, laws, and regulations governing animal care and welfare are extended to all vertebrate animals used in teaching and research under the auspices of the University. This mandate includes non-laboratory animals (e.g. wildlife and farm species) studied in association with the three University biological field stations (Blandy Experimental Farm, Anheuser Busch Coastal Research Center, and Mountain Lake Biological Station)¹, on UVA property, or under the supervision of a UVA approved and designated principal investigator (PI). UVA approved vertebrate animal care and use must adhere to the following federally mandated regulatory guidelines²: The Animal Welfare Act, PHS Policy, *The Guide for the Care and Use of Laboratory Animals*, *U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training*, and the 2000 Report of the American Veterinary Medicine Association Panel on Euthanasia.

The University of Virginia Public Health Service Assurance of Compliance, UVA IACUC Policies, and all other local, state and federal regulations also apply. In addition, all approved investigators must possess valid local, state, and federal permits (e.g. collecting, banding, interstate transport, CDC biohazard, nuisance wildlife, etc.) as required by law. At the time of IACUC protocol application, each PI is requested to submit copies of these documents together with their animal use protocol. Researchers or students from other institutions who conduct research at field stations, on UVA property, or under the auspices of UVA, are subject to the same regulations and requirements

Three general requirements must be fulfilled before vertebrate animal research or teaching can be initiated under the auspices of a UVA field station. These are as follows: 1. there must be an UVA IACUC approved animal research protocol on file in the IACUC office from either UVA or the home institution of the PI; 2. PI's must assure adequate personnel training/experience or verify direct supervision for training purposes; and 3. documentation of participation in an occupational health program or equivalent, at either UVA or the parent

¹ For practical purposes, animal use as applied to a field study (i.e. involving animals not housed in captivity on main campus grounds) is any human-directed activity that involves vertebrate animals in such a way as to impact their short or long-term well-being (i.e. increase or decrease survival or breeding success). Passive nature study would not be covered by IACUC oversight; whereas, projects/courses would be covered where animals are confined, manipulated, marked, predisposed to increased predation, or where practices lead to altered survival or breeding success (e.g. projects to identify hawk nests where human scent leads raccoons to predate the nest).

² The PHS website (<http://grants1.nih.gov/grants/olaw/references/phspol.htm>) provides background related to this legislation.

institution, or a signed waiver, is required. The details related to the above requirements are provided below. All documents must be approved and on file in the IACUC office *prior to* initiating any vertebrate animal work.

University of Virginia Researchers, Instructors, and Students

Prior to starting vertebrate animal fieldwork or instruction in association with the field stations, University of Virginia PI's must have received UVA IACUC approval for their vertebrate animal research protocol. Only an active faculty member of UVA may serve as PI and submit a protocol to the IACUC for review and approval. If a UVA investigator trains or directs students in techniques utilizing vertebrate animals at a field station or under UVA auspices, the names of the students involved must be provided, and the students are subject to the same rules and regulations as the investigator. The names of the students may either be submitted as "animal handlers" in the animal use protocol, or if there is frequent turnover of students, a class roster for each course may be submitted to the IACUC office prior to animal handling (minor approval process). All coursework involving UVA or outside instructors may be included under a single course IACUC protocol for course segments held at that station submitted by the Station Director, who serves as PI. As for research protocols, coursework protocols may also be submitted by the UVA instructor as PI, as deemed appropriate by the Station Director. The on-line protocol form and directions for completion and submission are available at the following website: <http://keats.admin.virginia.edu/acuc>.

Directors of the field stations (Directors) are charged with providing "Right-to-Know" documents detailing species and site-specific risks and information to researchers and course participants prior to matriculation (e.g. via a web site link), or upon arrival at the station, to assure that informed decisions about personal risk can be made. Researchers, students and other persons involved in any capacity where vertebrate animal space is shared must read the information and **sign** the appropriate documents to acknowledge they have been informed of, understand, and accept the risks associated with their particular research or teaching activity. If personnel at the field station have questions, they are encouraged to contact the UVA PI or the Director for clarification, or to pursue further information as they request, in order to assure they have access to all the information they need to make an informed decision about their own personal risk. Copies or electronic versions (.pdf files) of all signed informative documents must be forwarded to the IACUC office before research commences.

All individuals (students, employees and faculty under UVA auspices) conducting vertebrate animal research or teaching must enroll in the occupational health program at the University of Virginia provided either through employee Occupational Health or Student Health, as appropriate, and may waive this connection in lieu of a family physician. The "Right-to-Know" documentation is provided by each field station so individuals can discuss the risks with their physician or occupational health provider, as appropriate. The cost of the health examination/fitness-for-duty will be the responsibility of the principal investigator. In lieu of this, any individual may elect to receive health certification from a private physician at his/her own expense. In the event the occupational health provision is *refused*, the matriculant must sign a waiver statement releasing UVA from liability. The waiver includes: for health

consequences resulting from exposure to vertebrate animals or animal products or parts, and acknowledging the hazards of the work and the advisability of participating in an occupational health program or consulting a physician prior to arrival at the field station. Documentation of health care provision given by the respective health providers (or a signed refusal), must be provided to the IACUC office before final protocol approval.

As for other UVA IACUC protocols, documentation of sufficient animal handling experience (training) for the species and procedures entailed is required of supervisory personnel; trainees must be adequately supervised on site by those experienced personnel. Training requirements will vary depending on the nature of the research or teaching, and on the species involved. Training may vary from computerized training modules to class instruction to on site individual hands-on techniques training, at the discretion of the PI. All individuals must be trained in the rules and regulations regarding the humane care and use of vertebrate animals³. In certain instances, individuals may be required to take additional species-specific training or receive training in specific techniques, at the discretion of the Director, or the IACUC. Regardless of the type of training, documentation of appropriate training is required to be on file in the IACUC office. Documentation typically consists of a brief description (e. g. containing curriculum vitae excerpts) detailing this training. This information could be included in the cover letter for IACUC submission at UVA.

Non-University of Virginia Researchers, Instructors, and Students

Researchers and other individuals working with animals are responsible for maintaining compliance with all federal, state, and local regulations, as well as University of Virginia, or home institution IACUC policies. All individuals are under the immediate authority of the field station Director when conducting research in association with the University of Virginia field stations. *However, researchers or visitors not working with vertebrate animals in any capacity are only subject to the “Right-to-Know” and liability sign-off provisions below, even though they may stay at the field station.*

Non-UVA PI's must provide a copy of an approved animal use protocol, and evidence of IACUC approval from the parent institution to conduct research that involves vertebrate animals in association with the specific UVA field station, and the protocol must address pertinent specifics of the work at that site(s). Although the parent institution may often be in a better position to evaluate the research protocol, it remains necessary for the PI to receive final approval from the UVA IACUC, through the field station Director. The protocol from the parent institution must be submitted to the field station Director who will in turn submit it to the UVA IACUC office for further distribution and record keeping. Although the protocol application from the non-UVA researcher will receive designated member review, any IACUC member may request full committee review at a regularly scheduled IACUC meeting, if they feel it is necessary. The UVA IACUC reserves the right to approve, modify, table, or disapprove any research protocol involving vertebrate animal use performed under the auspices of the field stations. While UVA will generally defer to protocol approval by the PI's parent institution, it also reserves the right to nullify any protocol and cease research procedures, if deemed to be in

³ This may be provided in a “Right-to-Know” document.

the best interests of the animals, the University, or to maintain regulatory compliance. As described above, all instruction provided by non-UVA instructors will be covered under a single UVA IACUC protocol held by the field station Director, as instructional PI for that field station.

A non-UVA PI must also submit to the UVA IACUC office (via the station Director) evidence of enrollment in an Occupation Health program from the parent institution, or a health certification from a medical doctor (such as a family physician) or, if necessary, a signed refusal of health evaluation waiver a (as described above). Evidence of completion of adequate and appropriate training either from UVA or the parent institution is also required. Such evidence is placed on file in the IACUC office and can consist of a cover letter detailing relevant experience (e. g. CV excerpts) included with the forwarded approved IACUC form from their respective institution.

All field station visitors should be provided with “Right-to-Know” documents of risks associated with potential exposure to animals or diseases or hazards related to being at the field station, or in using its facilities or equipment. A signed properly completed liability waiver/”Right-to-Know” document is required of students, researchers, instructors, boarders and others visiting the field station in connection with field station programs. A liability waiver should be signed as well. The respective field station Director will determine if additional documents are necessary based on the individual’s anticipated level of exposure or special considerations. Vertebrate animal housing areas will be designated as “Authorized Personnel Only” areas, when in use.

Responsibilities of the Field Station Director:

Directors are responsible for oversight of all researchers and visitors involved in any capacity with vertebrate animal-related teaching and research. Directors are also ultimately responsible for assuring the timely forwarding of documentation to the UVA IACUC office⁴. Some of the requirements below may be incorporated into one signed document to be more user friendly. At a minimum, the UVA IACUC must receive the following required paperwork related to animal users at the respective field stations: 1. Assurance of occupational/student health participation, medical certifications signed from private physicians or student health center staff members, or, signed refusal waivers; 2. Documentation of training/experience, or trainee assignments; 3. Signed and dated “Right-to-Know” and liability waiver forms^{5,6}; 4. Copies of applicable collecting permits; 5. Written verification of IACUC protocol approval, and a single copy of each applicable vertebrate animal care and use protocol from the IACUC of the PI’s parent institution. *All documentation (except the “Right-to-Know”/liability form [“3.”*

⁴ Electronically signed “.pdf” files or signed paper originals of all informative documents must be forwarded to the IACUC office before research or teaching begins.

⁵ In some cases, school groups or minors under 18 years of age may use the field stations. In these instances, the document must be signed by the responsible parent or legal guardian. In addition, for the general public, an abbreviated brochure indicating the risks in simple language can be provided. This brochure will reference website or other sources or contacts where more detailed information may be accessed. (This document could address University liability at the same time, as needed.)

⁶ Other persons (such as janitors and repair personnel, etc.) accessing the animal areas can be provided the “Right-to-Know” information as appropriate, at the Director’s discretion.

above], course student additions, and other minor changes as defined by UVA IACUC policy) must be received by the UVA IACUC at least 60 days prior to initiating research. This is to allow sufficient time for processing and approval. Typically, turnaround on approvals is faster.

Before accepting a project, either as the instructional PI and/or as an *ex officio* member of the UVA IACUC reviewing the outside PI's protocol, the Director is assumed to be endorsing the acceptability and feasibility of the non-UVA researcher's protocol application. This includes consideration of special risks, including potential biohazardous, radiological, or chemical uses, and added medical concerns related to PI activities. The protocol from the parent institution must provide specific approval to conduct research at or in association with the UVA field station in question, and the protocol must address pertinent specifics of the site.

Directors or their designees also supervise all field station-supported web postings, or other publications. These postings must comply with the UVA IACUC Policy on Visual Images of Animals and other relevant UVA policies.

Finally, inspections of field stations are federally mandated and may be initiated by the USDA, PHS (Department of Health and Human Services IACUC, Association for the Assessment and Accreditation of Laboratory Animal Care (AAALAC) or other vested University agents. The Director is responsible for arranging to meet with these inspection teams or to designate a knowledgeable on-site alternate who has protocol and vertebrate animal access privileges.

Oversight Summary

The University of Virginia IACUC provides regulatory oversight of the field stations in conjunction with the field station Director. As an *ex officio* IACUC member, the Director reviews the research protocol, training, and occupation health monitoring and forwards his/her comments on the adequacy and appropriateness to the IACUC. A designated IACUC member also reviews the approved protocol from outside UVA, and makes recommendations to the Committee. Each field station Director serves as UVA PI for all instructional IACUC protocols performed in association with the respective field station; such protocols undergo full committee review as for any other IACUC protocol at UVA.

During performance of the work, day-to-day oversight of the compliance of personnel at the field station is the direct responsibility of the Director or his/her designated authority. As a result, the Director or her/his designated authority must be available for consultation in the event of a vertebrate animal related problem. Likewise, these responsible parties can access the University veterinarian on call, at any time when animal care/veterinary medical concerns arise. The University considers the Directors of the field stations to have ultimate responsibility for the conduct of all research and teaching activities involving animals at their facilities, regardless of who is project PI.⁷

⁷Additional field station director responsibilities as relates to increased workload (associated with compliance activities), loss of revenue after policy implementation, and individual (vs. institutional) liability are not addressed in this policy. These refinements will require further input and clarification from the university central administration.

The IACUC, as required by law, will provide final review of vertebrate animal use, related research/teaching protocols, training, and occupational health monitoring. Furthermore, it will maintain documentation of compliance and conduct on-site inspections at least twice yearly, as permitted when the field stations are open. The IACUC and the field station Director⁸ have the authority to suspend an investigator's privilege to conduct animal-related research or teaching if they determine that the investigator is not in compliance with the rules and regulations described in this policy.

Finally, a standing oversight subcommittee composed of field station Directors, associate Directors, and several IACUC members will be established to address new issues, develop and revise policies, and make recommendations to the UVA IACUC regarding issues pertinent to field stations. This "Policy" remains open to modification on the recommendation of the standing committee. It is also understood that in the first year following Policy approval (2003), is a trial period where changes can be implemented. The Director will, in all good faith, work toward full implementation of the Policy as soon as is possible for his/her field station.

⁸ The Director must immediately notify the IACUC of any suspension of activity or revocation of animal research privileges.