

 BROWN	Institutional Animal Care and use Committee (IACUC): Policy on Holding Animals not Covered by Active Animal Care and Use Protocols	POL # 10.10.35
		Effective Date: 5/2/2014

1.0 Policy Purpose

The purpose of this policy is to establish a mechanism for holding animals not assigned to a current Brown University IACUC-approved animal use protocol, and to define the expectations and responsibilities of the Center for Animal Resources and Education (CARE) staff and the Principal Investigator (PI) when animals are moved to holding under this policy.

2.0 To Whom the Policy Applies

This policy applies to all individuals intending to use live vertebrate animals on an IACUC-approved animal use protocol at Brown University, in instances when the animal(s) are not covered by an IACUC-approved protocol.

3.0 Policy Statement

All vertebrate animals used in teaching and research at Brown University must be covered by an IACUC-approved animal use protocol. The IACUC cannot permit activities such as breeding, training demonstrations, experimental manipulations, or euthanasia to be performed with vertebrate animals that do not come under an IACUC-approved animal use protocol. This is required by the Public Health Service Policy on the Humane Care and Use of Laboratory Animals (the “PHS Policy”) and the United States Department of Agriculture (USDA) Animal Welfare Act Regulations.

Circumstances can arise in which animals intended for use on a study are at Brown University, but not covered by an IACUC-approved animal use protocol. Under such circumstances, no experimental or teaching procedures are permitted on these animals. Such procedures include, but are not limited to: data collection, sample collection, surgery, administering substances, training/performance of tasks. The IACUC will consider requests made in writing to conduct activities necessary to maintain the experimental viability of the animals. Any animal housing related charges will continue to be the responsibility of the PI, but may not be charged to an award funded by an external sponsor.

3.1 Situations Requiring the Holding Under this Policy

Use of this policy is intended to be temporary. Situations which might be covered under this policy include:

- Animals ordered without an IACUC-approved animal use protocol. The CARE office, which is responsible for ordering all animals, will usually require IACUC approval prior to placing the order. However, the Director of CARE (or this individual’s designee), with the knowledge of the IACUC Chair and the Office of Research Integrity (ORI), may approve the order under extenuating circumstances during the IACUC protocol review process, provided the PI requests it and has internal funding to cover the purchase and associated costs prior to

IACUC animal use protocol approval. It is understood that the PI may not use the animal(s) for any purpose until the animal use protocol is approved.

- Animals originating from inactive (or terminated) protocols.
- Animals on a protocol under investigation for potential issues of noncompliance where the welfare or well-being of the animals is in question and after IACUC suspension of activity.
- New investigators without an IACUC-approved animal use protocol having animals that may require immediate housing at Brown. The policy will not take effect until the animals have been received by CARE.
- Investigators that are leaving Brown and do not have the necessary approvals for animal transfer to their new institution. It is recommended that investigators maintain an active animal use protocol to cover costs and charge the relevant grant (as applicable) until the transfer of animals is complete.

3.2 Procedures Associated with Activating this Policy

This Policy is activated by completing the CARE Holding Policy Request Form ("Request form"). The following steps are required:

- Complete the Request form. The PI or his/her department chairperson will be required to identify an internal account which may be charged for the costs associated with the animals' care. Animal charges will be prohibited on any federal awards. If there is an external non-federal award to which the investigator wishes to allocate charges, written confirmation from the sponsor and/or the Brown Office of Sponsored Projects (OSP) that this is allowable will be required.
- The PI or the PI's designee submits the Request form to CARE.
- Approval: The Director of CARE and the Senior Director of ORI (or designee), with notice to the IACUC Chair, can authorize the transfer of animals from an active IACUC animal use protocol to the holding policy. All actions will be reported to the IACUC at the next regularly scheduled meeting.
- Notification: Animal Research Compliance (ARC) in ORI will notify CARE and the PI that the use of this policy has been approved. When applicable, CARE will verify that the transfer has been completed and that no animals are being housed under an expired or suspended animal use protocol.
- Transfer of the animals included in the Request form: CARE will be responsible for identifying the animals; this can be done at the cage level, on the animal room door, or both.
- Effective on the day following the transfer, where applicable, all animal charges must be moved to an account not associated with any external funding source.
- Reinstating the animals to an appropriate IACUC-approved animal use protocol when available: Disposition of the animals remaining under this policy at the end of sixty (60) days will be at the discretion of the Attending Veterinarian. It is the responsibility of the PI to submit a compelling justification in writing for the IACUC's consideration if there is a request to extend beyond 60 days.
- All correspondence related to the procedures above is retained by ARC.

3.3 Research and Health Related Notifications to CARE

CARE must be notified of any significant research or health related conditions prior to the transfer of animals to this policy. Examples of important information include, but are not limited to:

- Existing surgical implants;
- Biological, Chemical or Radiation hazards;
- Zoonotic disease;
- Special dietary needs;
- Past surgical history;
- Viral vectors;
- Poor fecundity.

3.4 Management of Animals Under this Policy

Breeding may be performed to maintain viability of specific, non-commercially obtainable animals under this policy. Such activity must be approved by the Chair of the IACUC, the Director of CARE (or designee) or the Senior Director of ORI (or designee). Expansion colony breeding is not authorized. Feeding and sanitation will be performed as appropriate for the species. Standard institutional environmental enrichment will be provided to all animals under this policy. Veterinary care will be provided in accordance with currently accepted standards. In the event that euthanasia is necessary, it will be conducted in accordance with the *AVMA Guidelines for Euthanasia of Animals: 2020 Edition*.

3.5 Charges

Per diem charges for animals will be charged to the PI (or Department) while animals are covered by this policy. Animal charges will be prohibited on any federal awards. If there is an external non-federal award to which the investigator wishes to allocate charges, written confirmation from the sponsor and/or OSP that this is allowable will be required. It is the responsibility of the PI to ensure that animal charges are allocated to an appropriate account for the duration of the animals' time on this policy.

4.0 Definitions: N/A

5.0 Responsibilities

All individuals to whom this policy applies are responsible for becoming familiar with and following this policy. University supervisors are responsible for promoting the understanding of this policy and for taking appropriate steps to help ensure compliance with it.

Principal Investigator

- Will submit the Animal Holding Request form to CARE for the circumstances described within this policy.
- Will work with the IACUC to ensure that there is no IACUC approval for any anticipated or ongoing animal use including breeding while animals are maintained under the Holding Policy.

Animal Research Compliance (ARC)

- Will maintain a mechanism for rapid transfer of animals to this policy in cases where it is necessary to protect the well-being or welfare of animals, or to prevent the wastage of animals.
- Will notify the CARE office, in writing, that the transfer has been approved.
- Will report to the IACUC at its next scheduled meeting any transfers that have occurred in accordance with this policy.

Director of CARE (or Designee)

Will receive and oversee the care and use of animals covered under this policy that would otherwise be euthanized for lack of an existing IACUC-approved animal use protocol. The IACUC provides approval under this policy to provide for the health and well-being of the animals. Examples might include: ongoing post-operative care, chronic catheter maintenance, administration of insulin, etc. that may be performed by the CARE staff under the supervision of the CARE Director. Medical treatments and/or euthanasia will be provided at the discretion of the CARE Director or designee.

6.0 Consequences for Violating this Policy

Violation of this policy may be considered a serious event of noncompliance that is reportable to the IACUC, funding and accrediting agencies, as well as other regulatory agencies. Violation of this policy is a serious matter that may adversely affect both the ability to perform animal work and acquire funding sources.

Failure to comply with this and related policies is subject to disciplinary action, up to and including suspension without pay, or termination of employment or association with the University, in accordance with applicable (e.g., staff, faculty, student) disciplinary procedures.

7.0 Related Information

Brown University is a community in which employees are encouraged to share workplace concerns with University leadership. Additionally, [Brown's Anonymous Reporting Hotline](#) allows anonymous and confidential reporting on matters of concern online or by phone (877-318-9184).

The following information complements and supplements this document. The information is intended to help explain this policy and is not an all-inclusive list of policies, procedures, laws and requirements.

7.1 Related Policies: N/A

7.2 Related Procedures: N/A

7.3 Related Forms:

- [Animal Care Holding Policy Request Form](#)

7.4 Frequently Asked Questions (FAQs): N/A

7.5 Other Related Information: References

- American Veterinary Medical Association. [AVMA Guidelines for the Euthanasia of Animals: 2020 Edition.](#)
- National Institutes of Health (U.S). Office of Laboratory Animal Welfare., United States. Public Health Service. 2002. [Public Health Service policy on human care and use of laboratory animals.](#)
- United States., United States. Animal and Plant Health Inspection Service. 2020 Animal Welfare Act and animal welfare regulations. Washington, D.C.: U.S Dept. of Agriculture, Animal and Plant Health Inspection Service.

8.0 Policy Owner and Contact

8.1 Policy Owner: Vice President for Research

8.2 Policy Approved by: Vice President for Research

8.3 Subject Matter Contact: Brown University Animal Research Compliance

- Telephone: 401-863-3050
- Email: IACUC@Brown.edu

9.0 Policy History

9.1 Policy Effective Date: May 2, 2014

9.2 Policy Last Reviewed: January 14, 2022

9.3 Policy Update/Review Summary: This policy was reviewed by the IACUC at its convened meeting on January 14, 2022

- Policy on Holding Animals not Covered by Active Animal Care and Use Protocols, date of IACUC review and approval: October 2, 2020
- Policy on Holding Animals not Covered by Active Animal Care and Use Protocols, date of IACUC review and approval: July 10, 2019.