



Institutional Animal Care and Use Committee (IACUC) Directive 19.0: Satellite Animal Facility

1.0 Directive Purpose

The purpose of this directive is to provide requirements for researchers when requesting and using an approved **Satellite Animal Facility** in circumstances when a **Dedicated Animal Facility** cannot be used or is otherwise not ideally suited for the proposed animal work.

2.0 To Whom the directive Applies

This directive applies to all individuals using live vertebrate animals under an IACUC-approved animal use protocol at Brown University.

3.0 Directive Statement

It is the policy of the Brown University IACUC and the Center for Animal Resources and Education (CARE) that all animals requiring facilities for housing and use are maintained in an IACUC-approved, Dedicated Animal Facility. Use of a Dedicated Animal Facility allows for enhanced communication among all personnel and consistent and high-quality animal care. Clearly identified roles and responsibilities and coordinated allocation of resources and funding are additional advantages of using a Dedicated Animal Facility.

Maintaining animals in areas outside of a Dedicated Animal Facility, referred to as a Satellite Animal Facility, requires significant additional resources, as the Satellite Animal Facility must be maintained in accordance with accreditation standards, oversight agency requirements, and Brown University policies. Therefore, careful consideration must be given by the Principal Investigator (PI) in requesting use of a Satellite Animal Facility and by the IACUC in evaluating its proposed use.

3.1 Background

The Guide to the Care and Use of Laboratory Animals, 8th Edition (the *Guide*) states that the design of animal facilities combined with appropriate animal housing and management are essential to animal well-being, the quality of animal research, teaching or testing programs involving animals, and the health and safety of personnel. Further, all animals must be housed under conditions that provide sufficient space as well as supplementary structures and resources required to meet physical, physiologic, and behavioral needs. Environments that fail to meet the animals' needs may result in abnormal brain development, physiologic dysfunction, and behavioral disorders in the animals that may compromise both animal well-being and the scientific validity of the research in which the animals are engaged.

The Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals (PHS Policy) requires, further, that the IACUC shall determine that the research project conforms with Brown's PHS Assurance and meets the following requirements:

- The living conditions of animals will be appropriate for their species and contribute to their health and comfort; and
- The housing, feeding, and nonmedical care of the animals will be directed by a veterinarian or other scientist trained and experienced in the proper care, handling, and use of the species being maintained or studied.

3.2 Requesting Satellite Animal Facility Housing

The PI must engage the Attending Veterinarian (AV) and Animal Research Compliance (ARC) early in the planning process when the PI intends to request use of a Satellite Animal Facility. This will ensure there is sufficient time prior to the animals' arrival to discuss available housing options.

Brown Environmental Health and Safety (EHS) personnel, building and facility managers, and others may also need to weigh in on Satellite Animal Facility discussions. Directors and personnel who manage the space in which the Satellite Animal Facility is being proposed must be consulted by the PI early in the proposal process to determine whether the facility can accommodate or support the proposed animal housing or use.

If a Satellite Animal Facility is proposed for use by the PI, a formal request must be submitted in writing by the PI to the IACUC and to the Attending Veterinarian for review and approval as an additional animal facility for inclusion in Brown's Animal Care and Use Program. This formal request must come in the form of an amendment to an IACUC-approved protocol. It must include a compelling scientific or other justification describing why a Dedicated Animal Facility cannot support the proposed animal work. Cost and/or convenience **cannot** be primary considerations for proposing use of a Satellite Animal Facility.

In addition to an amendment, the Principal Investigator must create and submit a written Standard Operating Procedures (SOP) for operating the Satellite Animal Facility in accordance with the expectations set forth in the IACUC's Satellite Animal Facility Standard Operating Procedure.

3.3 Review and Approval of Satellite Animal Facility Request

The IACUC will typically review an amendment requesting use of a Satellite Animal Facility at a convened meeting, but reserves the right to review and approve use of a Satellite Animal Facility via Designated Member Review. The IACUC may withhold approval for use of a Satellite Animal Facility if the location is determined to be inappropriate for the species; if the justification is deemed insufficient; if the proposed use of the space is improper; if the accompanying written SOP is insufficient; and/or if the request is misaligned with the needs and requirements of Brown's Animal Care and Use Program.

If the IACUC approves the proposed use of the Satellite Animal Facility, the ARC team will send the IACUC's written approval of the corresponding amendment to the PI. Housing of animals in the Satellite Animal Facility **is not** permitted until ARC sends a separate written notice to the PI indicating that the Satellite Animal Facility has passed a final facility inspection **and** confirming that the SOP is approved (with inclusion of any revisions requested by the IACUC or the AV). Receipt of IACUC approval does not guarantee that the Satellite Animal Facility will pass inspection and/or that the associated, required SOP will be approved.

3.4 New Faculty Recruitment

The Attending Veterinarian or the AV's designee must meet with new faculty recruits during the recruitment period and prior to extension of an offer of employment or appointment if the new recruits plan to use animals in research at Brown, either immediately upon arrival or in the future, to discuss (among other items) use of Dedicated and Satellite Animal Facilities.

4.0 Definitions

Dedicated Animal Facility: An IACUC-approved animal care and use facility designed specifically for housing animals and managed directly by CARE. The use of Dedicated Animal Facilities is required unless an exception is justified and use of a Satellite Animal Facility is approved by the IACUC.

Satellite Animal Facility: An IACUC-approved animal facility maintained primarily by an investigator and outside of direct CARE and IACUC oversight, in which animals are housed for greater than 12 hours (for USDA-covered species) or 24 hours (for non-USDA covered species). Facilities outside Brown-owned or controlled spaces that are used for live animal procedures are also considered Satellite Animal Facilities.

5.0 Responsibilities

All individuals to whom this directive applies are responsible for becoming familiar with and following this it. Animal research program stakeholders (IACUC, CARE, ARC) are responsible for promoting the understanding of this document and for taking appropriate steps to help ensure adherence to it.

Department Chairs and faculty members chairing faculty search committees: Responsible for engaging the AV during recruitment of new faculty who use or intend to use animals.

6.0 Consequences for Violating this Document

Violation of this document may be considered a serious event of noncompliance that is reportable to the IACUC, funding and accrediting agencies, as well as other regulatory agencies. Violations of this document are 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 document and is not an all-inclusive list of policies, procedures, laws and requirements.

7.1 Related Policies/Directives/SOPs:

- Satellite Animal Facility Standard Operating Procedure

7.2 Related Procedures: N/A

7.3 Related Forms: N/A

7.4 Frequently Asked Questions (FAQs): N/A

7.5 Other Related Information: References:

- **Animal Welfare Act.** United States Department of Agriculture Animal and Plant Health Inspection Service. May 2020. USDA-APHIS
- National Institutes of Health, Office of Laboratory Animal Welfare. 2015. PHS Policy on the Humane Care and Use of Laboratory Animals.

8.0 Document Owner and Contact

8.1 Owner: IACUC

8.2 Approved by: IACUC

8.3 Subject Matter Contact: Brown University Animal Research Compliance (ARC)

- Telephone: 401-863-3050
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9.0 Document History

9.1 Effective Date: April 5, 2019

9.2 Last Reviewed: October 6, 2023

9.3 Update/Review Summary: This document is was converted into Directive format and included minor updates October 6, 2023.

- Section 8.3 was updated on December 2, 2020, to reflect a new office title. This policy is not new; it was converted to the University's new policy template and re-reviewed by the IACUC at its convened meeting on April 3, 2020.