IACUC POLICY
REPORTING ANIMAL WELFARE CONCERNS

The University of Pennsylvania Institutional Animal Care and Use Committee (IACUC) and Office of Animal Welfare (OAW) have developed the following policy to clarify the mechanism for reporting animal welfare concerns. IACUCs are required to review concerns involving the care and use of animals at the institution (PHS Policy IV.A.3.), regardless of whether those concerns result from public complaints or from reports of potential noncompliance received from within the University (AWAR 2.31(c)(4)). Training to enhance staff awareness, the posting of signage, and providing a method by which such reports can be made anonymously and without fear of reprisal are critical elements of the reporting program (AAALAC FAQ B.7.)

The responsibility to safeguard animal welfare and report concerns are the responsibilities of everyone in the animal research program—research staff, veterinary and animal care personnel, administrative employees, etc. (Guide, p. 23).

GENERAL REPORTING. Personnel are encouraged to file reports with the Office of Animal Welfare (iacuc@pobox.upenn.edu, 215-573-2540), but reports may also be made to the Institutional Official (Dr. Dawn Bonnell, Vice Provost for Research, vpr@exchange.upenn.edu, 215-898-7236), Attending Veterinarian (Dr. Diane Gaertner, gaertner@upenn.edu) or the IACUC Chair (Dr. Yale Cohen, ycohen@mail.med.upenn.edu).

Additionally, animal welfare concerns may be reported to the ULAR facility veterinarian or other authorized veterinarians. If the health or well-being of the animal may be in jeopardy, then the ULAR veterinarian or other authorized veterinarian should be contacted immediately. For animals housed within Philadelphia, emergency procedures outlined in ULAR SOP 4.00 Animal Health Observation Procedures or other applicable policies should be used. For animals housed at New Bolton Center (NBC), each group has coordinated with ULAR to determine their emergency veterinary care procedures based upon species and location, with NBC Field Service always available to provide back-up care.

TRAINING. Training on methods for reporting concerns about animal use is required (Guide, p. 18) and is accomplished by completing the “Regulations and the IACUC” online module.

SIGNAGE. Mechanisms for reporting concerns should be posted in prominent locations in laboratories and all animal housing areas (vivaria and satellite housing), e.g. main entrance or exit, PPE donning stations, etc. (Guide, p. 24). The official animal welfare reporting sign may be found on the IACUC website.

ANONYMOUS REPORTING. A major deterrent to reporting is the fear that the person or persons against whom the report is made will retaliate against the person making the report. Because of this, the University prohibits retaliation against those who make bona fide reports of possible noncompliance, also referred to as ‘whistleblowers’ (Human Resources Policy 718 “Policy Against Retaliation”). If requested by the whistleblower, their identity will be limited to the IACUC Chair and Director of Animal Welfare. If the whistleblower wishes to remain fully anonymous, then reports should be filed with Penn’s Confidential Reporting and Help Line by telephone (215-P-COMPLY, 215-726-6759) or online (https://secure.ethicspoint.com/domain/media/en/gui/22868/index.html). If requested by the whistleblower, OAW may communicate general findings to the concerned employee(s) (Guide, p. 23-24).

APPROVED
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