

Washington State University
Institutional Animal Care and Use Committee

Policy #7

“IACUC Oversight of Research and Teaching Activities Using Privately Owned Animals”

Approval Date: 11/21/23 (Replacing version 6/27/18)

1. Purpose

The Institutional Animal Care and Use Committee (IACUC) is responsible for reviewing the use of live vertebrate animals used in Washington State University (WSU) research and teaching activities. This policy defines which activities involving the use of privately-owned animals require IACUC approval and the process for determining exemptions from IACUC review.

2. Background

Privately-owned animals are those in which WSU has no ownership, so final stewardship responsibilities reside with the animal’s owner. However, the institution still has a responsibility to assure appropriate humane care and use of animals involved in WSU research and teaching activities.

The [PHS Policy](#) covers live vertebrate animals used or intended for use in research, research training, and biological testing activities conducted or supported by the PHS, NSF, VA and NASA. The PHS Policy and the Animal Welfare Act and Regulations (AWAR) do not distinguish between animals owned by the institution and privately owned animals. In addition, the Guide for the Care and Use of Agricultural Animals in Research and Teaching also requires institutions to have a policy on the use of privately owned agricultural animals used in research and teaching.

This document does not cover the situation where wildlife is the focus of a study. The IACUC Policy on conducting field research with free-ranging wildlife is covered in [IACUC Policy #40](#).

Definitions:

- Privately owned: domestic animals owned by an entity (individual, organization, or institution) other than WSU. If animals are owned by an organization or institution, owner consent must come from the decision-making authority. For example, consent for use of an animal from a local animal sanctuary must come from the governing board of that sanctuary.
- Private facility: A facility that WSU does not own. This includes kennels, zoological parks, privately-owned farms, and animal sanctuaries.
- Informed Consent Form: Agreement between a WSU researcher/instructor and an individual, organization, or institution other than WSU to allow animals to participate in clinical trials, research or teaching based on sufficient information (e.g., regarding possible risks and benefits of the activity) and adequate opportunity to consider voluntary participation. Please view the [IACUC Website](#) for a template consent form. Informed consent forms should include the following:
 - Description of the purpose of activity and the anticipated benefits
 - Description, in detail, of all procedures that will be performed on the animal(s)
 - Description of the risks, if any, to the animal or the client, including risks of not using alternative, established treatments
 - Indication if there will be any compensation for participating in the activity.
 - Indication if there will be, or if there will not be compensation in case of problems resulting from the activity.
 - Costs that will be incurred by the client (general types of charges, rather than actual fees)
 - Information that participation is voluntary and that the owner may withdraw permission and the animal at any time.
 - Responsible contact person if there are problems, including a phone number. Details of likely problems or symptoms about which the investigator or other veterinarian needs to be notified should be included. IACUC contact should be provided as an additional contact for concerns.
 - Lines for investigator and client signatures and dates

3. Policy

Teaching and research activities involving privately owned animals are exempt from IACUC approval only when ALL the following conditions are met:

1. The animals do not belong to WSU, but instead to a private individual, farm, organization, or an institution other than WSU.
2. No physiological or pathological condition or disease is induced in the animals. A condition may spontaneously occur in these animals and receive treatment, but it is not induced.
3. Any activity is incidental to the normal husbandry or veterinary care and in accordance with what a practicing veterinarian, pet owner, or farmer/rancher would perform on their clients' animals or on their own animals. No medically unnecessary diagnostics, sampling, testing, or procedures are conducted; nor are medically necessary treatments or procedures delayed or withdrawn. No procedures are conducted solely for the purpose of student training.
4. IACUC approval is not required per regulations or as a condition of award from an outside funding agency. All Public Health Service supported research requires IACUC approval.

All the above conditions must apply for the activity to be exempt from IACUC approval.

The below is a (non-exhaustive) list of examples of activities that would require IACUC approval:

- The manner in which clinical veterinary care is provided is affected by the study (e.g., additional imaging or other diagnostic procedures conducted, additional samples taken. or the type, volume or frequency of samples increased, treatment withdrawn or delayed, etc.)
- The animal owner is not directly involved in all decisions regarding the care of their animal (e.g., random allocation to treatment or control groups)
- Funding of the study might alter the medical choices made by the owner.
- When a privately owned animal is recruited, with the owner's consent, for participation in a research study or veterinary clinical trial, and the activity includes collection or generation of data for research purposes, such activities are considered research and require IACUC review and approval.

The veterinary clinical care of a privately-owned animal that benefits the animal and/or is of medical necessity does not require IACUC approval. These animals are considered patients and the clinical care is typically offered as a fee-for-service activity.

IACUC approval is NOT required for use of animal-derived data when the investigator or his/her personnel did not intentionally participate in producing the data, either via activities or funding. For example, previously collected data from clinical cases may be used in retrospective studies without IACUC approval.

IACUC review is required by most publishers to publish studies involving animals. Furthermore, graduate students whose research involves animals at WSU are required to submit documentation of IACUC review and approval (or exemption from review) before submitting their thesis or dissertation. The IACUC will review these project proposals on request before the study commences to satisfy these requirements.

Exemption Process:

To obtain an exemption, the PI must submit a project summary to the Animal Welfare Program Office via email (iacuc@wsu.edu) for approval BEFORE initiating the activity. The AWP staff will verify the project meets the criteria above and, if needed, consult the AV, IACUC Chair and/or members of the IACUC. If the project is exempt than a signed exemption letter will be provided and can be used for publication or dissertation purposes. If the project does not meet the criteria than AWP staff will request that the PI submit an ASAF for IACUC review and receive approval in advance of initiating the activity.

Requirements for IACUC protocol submission for activities that do not meet all four conditions listed above:

Use of privately-owned animals at a private facility for WSU research or teaching:

1. An IACUC protocol must be submitted and approved for any research, testing, or teaching activity which interacts directly with the animal, or which would alter the animal's environment in a manner that could impact animal health or welfare.
2. The PI must provide information regarding the facilities to be used and include either a contract, MOU and/or individual form addressing informed consent.

3. Unless specified in the protocol, the private facility's procedures for care and welfare of animals will be followed.

Use of privately-owned animals at WSU facilities/university property:

1. An IACUC protocol must be submitted and approved for research, testing, or teaching activities utilizing privately owned animals that are brought into WSU facilities or property for the purposes of a research project or teaching opportunity for WSU students.
2. University club activities such as 4-H workshops, animal demonstrations, petting zoos or club recruitment in which owners and their animals attend educational activities and for which the owners maintain control of the animals, an IACUC protocol is not required. Events with animals are submitted through each campus's event coordination process for EHS & risk management review. An email to or.ocv.alert@wsu.edu detailing the event and the involvement of animals is also highly recommended.
3. Privately owned animals used in research projects may be subject to additional oversight at the College level in addition to IACUC oversight.
4. The informed consent form to be used must be received by the Animal Welfare Program Office if the activity requires an IACUC protocol.

Ongoing IACUC oversight of activities involving privately owned animals on university property:

1. The IACUC accepts the AVMA/AAHA accreditation oversight for the CVM program in the clinical areas where privately owned animals are used. The IACUC has the discretion to require an inspection or request information related to IACUC approved activities utilizing privately owned animals in the CVM clinic areas.
2. For other university facilities/property that are not subject to an external accrediting agency, the IACUC will determine the need to inspect the locations on a case-by-case basis.
3. Investigators are expected to report the number of animals used for an IACUC protocol.
4. Adverse events occurring on IACUC approved protocols must reported to the IACUC in a timely fashion to iacuc@wsu.edu. Please refer to [Policy #37](#):

Reporting Adverse Events, Abnormal Behavior/Conditions and Incidents for additional information.

Ongoing IACUC oversight of activities involving privately owned animals on private property:

1. The IACUC does not routinely inspect privately owned facilities where privately owned animal research or educational activities take place.
2. Investigators are expected to report the number of animals used for an IACUC protocol.
3. Adverse events occurring on IACUC approved protocols are to be reported to the IACUC in a timely fashion to iacuc@wsu.edu. Please refer to [Policy #37](#): Reporting Adverse Events, Abnormal Behavior/Conditions and Incidents for additional information.

Applicable Regulations & Guidelines

1. Animal Welfare Act (AWA, Public Law 89-544, 7 U.S.C.)
2. Animal Welfare Act Regulations (AWAR, 9 CFR, Chapter 1, Subchapter A)
3. Health Research Extension Act of 1985 and Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals
4. OLAW FAQ A7&A8 [FAQs | OLAW \(nih.gov\)](#)
5. National Research Council Guide for the Care and Use of Laboratory Animals, Eighth Edition. National Academy of Sciences, 2011
6. The Federation of Animal Science Societies Guide for the Care and Use of Agricultural Animals in Research and Teaching

Additional Information

1. [WSU IACUC Policy #9](#) “Off-Site WSU Research and Teaching Activities and Memorandums of Understanding”
2. [IACUC Policy #21](#) “Tissue Use”
3. [WSU IACUC Policy #17](#) “Instructional Animal Use”
4. [WSU IACUC Policy #36](#) “Counting and Reporting Animal Numbers”
5. [AVMA FAQ’s on Veterinary-Client Patient Relationship](#)