Policy # BP-22-2012

Policy Title: IACUC-Safety Committee Coordination of Protocol Review

Policy: The sharing of information between the IACUC and the Institutional Safety Committees (Institutional Biosafety Committee (IBC), Chemical Hygiene Committee (CHC), Laser Safety Committee (LSC), Radiation Safety Committee (RSC)) and their associated Safety Officers (BSO, CHO, LSO, RSO) is essential in order to ensure that the IACUC has sufficient oversight of work involving the use of bio-hazards, recombinant technology, nanotechnology, hazardous chemicals, lasers, x-rays and radioisotopes in live animals. The steps describing the multifaceted oversight of these types of work are outlined below:

1. Principal Investigators planning work with live animals complete and submit the IACUC protocol. If their particular work involves the use of bio-hazards, recombinant technology, nanotechnology, hazardous chemicals, lasers, x-rays and radioisotopes, or other hazards, the PI must complete the “Use of Hazardous Agents or Controlled Substances” form (Appendix D).

2. The preliminary review of the protocol and appendices is completed by the IACUC office. The IACUC staff identifies issues that may be of concern to the safety committees and generates a “Risk Assessment of Protocol Submissions” form (Appendix K). Appendix K is designed to elicit feedback from the particular group with expertise related to the particular hazard described. At this point, the protocol, Appendix D and the completed Appendix K are disseminated to the appropriate safety officer as determined by the hazard(s) being described. The safety officer determines if further review by their respective safety committee is warranted.

3. After reviewing the protocol, Appendix D and Appendix K, the appropriate safety officer provides feedback for the IACUC committee via the completion of Appendix K. Through this medium, the safety officer provides input, requests additional information and/or outlines additional requirements necessary to secure approval.

4. The information provided by the safety officer is shared with the IACUC during protocol review. Typically the EHS IACUC committee member presents any concerns on behalf of the safety officer(s), however, the IACUC Chair may also provide this information. Throughout the approval process, information is shared between the safety officer, their respective committees, and the IACUC to ensure that necessary approvals are obtained prior to the initiation of work.

5. When modifications related to safety committee requirements are necessary, these are communicated to the PI through the Requires Modification to Secure Approval letter that is sent to the PI.

6. The PI is informed that any work requiring safety committee review cannot commence until all the committee requirements have been met.

7. Once the safety committee has reached a determination regarding the PI’s work, the IACUC Program Manager is copied on the communication/approval that is sent to the PI.
8. For protocols that describe a new use of hazardous materials after initial IACUC approval, a meeting is held with ACS staff, research staff, and/or EHS staff (including the safety officers when necessary), to describe the work being done, hazards and risks, containment and disposal procedures, and required personal protective equipment. The safety staff post signs as necessary after risk assessment is done. Only then can the PI begin work with the hazard in question.