

**INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE POLICY*****Review and Approval of IACUC Submissions***

Approval Date: 2/17/2026

Previous Approval Date: 3/10/2025, 7/25/2024, 11/13/2023, 2/7/2022

Next Review Date: 2/2029

**SUBMISSION REVIEW PROCESS BACKGROUND**

- All vertebrate animal use for research, teaching, or testing at SUNY Downstate Health Sciences University must be reviewed and approved by the Institutional Animal Care and Use Committee (IACUC) before any investigator obtains animals or initiates research involving animals. The IACUC may approve, require modification of, or withhold approval from a project. Animal use in the absence of IACUC approval is a serious violation of Downstate policy and a violation of federal law.
- The Principal Investigator (PI) is responsible for providing accurate and sufficient information to the IACUC about the purpose and plan to use laboratory animals required for the Committee to make a reasonable evaluation of the impact of the research activities on the welfare of the animal subjects in accordance with federal regulations and university and sponsoring agency policies and procedures.
- Additional information or clarifications may be requested from the PI during the review process in an effort to facilitate the approval process. The PI is encouraged to email, call, or meet with IACUC Office staff and/or the IACUC Chair if the review comment and/or suggested language is unclear. The assigned IACUC reviewer(s) may communicate with the PI at their discretion.
- A preliminary administrative review is conducted to evaluate:
  - eligibility and completeness of the submission
  - whether personnel listed are eligible to conduct work
  - whether personnel listed have required training for the species and procedures proposed.
  - whether personnel listed have required Occupational Health Clearance for the species proposed and have enrolled in the Downstate Occupational Health and Safety Program.
  - whether review and approval of any associated Institutional Biosafety Committee (IBC) review are needed.

This policy offers direction on the following topics:

- Protocol and Amendment Pre-review
- Protocol Review Process
- Amendment Review Processes
  - Designated Member Review (DMR)
  - Administrative with Verified Veterinary Consultation (VVC)
  - Administrative
- Annual Review Process

**REGULATORY GUIDANCE**

- [Animal Welfare Act \(AWA\) and Regulations \(AWR\)](#)
- [Guide for Care and Use of Laboratory Animals \(Guide\)](#)
- [PHS Policy on Humane Care and Use of Laboratory Animals \(PHS Policy\)](#)
- [OLAW FAQ D9](#)
- [NOT-OD-14-126](#): Guidance on Significant Changes to Animal Activities
- [OLAW FAQ F4](#): Use of non-pharmaceutical grade substances in animals

**PRE-REVIEW of PROTOCOL and AMENDMENT SUBMISSION**

The review of animal research protocols and amendment forms has been designed to help guide the investigator by requiring the specific information needed in order to comply with federal regulations. A protocol is submitted for new research and amendments are submitted to propose changes to an approved protocol.

Consultation with the Attending Veterinarian (AV) or their designee is required during the planning phase of the study for PIs using USDA-covered species involving procedures that have the potential for pain and/or distress (category D or E procedures). The AV and the Institutional Animal Care and Use Committee (IACUC) Office staff are available for consultation with PIs to discuss any concerns during preparation of the protocol, design of the study and protocol review. All protocol submissions undergo a prereview which includes an assessment for eligibility, completeness, inaccuracies, and confirmation of content prior to being assigned to an IACUC reviewer and/or meeting agenda. Submissions and revisions received after the set deadline will be assigned to the next full committee meeting agenda.

The IACUC Office conducts a prereview in consultation with veterinary and primary reviewers. The PI is notified of any requests for clarification, required documentation, reviewer comments and/or suggested edits. This feedback is presented to the PI to allow changes to be made to the protocol prior to full committee review and facilitate a more efficient review of the submission.

Using this process:

- Requests for clarification, comments and suggested edits are sent to the PI or their designee.
- Revisions are addressed using the ‘track changes’ feature in Word format with the new updates in a different color font.
- The PI must address all comments and requests for modifications on or before the response deadline stated in the IACUC notification via email. Revisions must be submitted to [IACUC@downstate.edu](mailto:IACUC@downstate.edu)
- In addition to the notification email to the PI, the IACUC Office staff may forward a Word version of the document including the comments and suggested edits depending on the number of comments at their discretion.
- The following items will be reviewed prior to assigning a submission to an IACUC meeting agenda:
  - **Institutional Biosafety Committee (IBC) Approval**: Submissions are assessed to determine if IBC review and approval is needed. If needed, the PI is advised to submit an IBC application (or amendment to existing application if appropriate based upon IBC feedback to the PI) to the IBC for review. The IBC and IACUC reviews can occur in parallel. All relevant sections of the IACUC protocol must be revised according to the current IBC protocol. The IACUC approval cannot be processed until the necessary IBC approvals have been obtained. The PI must maintain IBC approval throughout the IACUC approval period.
  - **Training Completion**: Training requirements are assessed relative to the species being used and procedures performed. Any training that is needed is communicated to the PI and the personnel to complete the training. The IACUC protocols and amendments cannot be approved until training requirements have been fulfilled.
  - **Conflicts of Interests (COI) Disclosure and Training**: It is Downstate’s policy that Investigators may not have any interest, financial or otherwise, direct or indirect, or engage in business, transactions or professional activities or incur obligations of any nature that are in conflict with the proper discharge of their duties in the best interests of Downstate or that can be reasonably expected to bias the design, conduct or reporting of research unless these conflicts are appropriately declared and properly managed in accordance with the procedures and guidelines outlined below. Investigators must disclose their interests (and those of their related parties) and outside activities which may affect their independent and objective performance of their duties.
  - All Investigators involved in funded (external) and unfunded (internal) research related activities must comply with Downstate’s Research Conflict of Interest Policy (No: RFDHSU-01 ). IACUC protocol

submissions will not be assigned to a convened IACUC meeting unless all applicable COI disclosures, annual and transactional, and completion of Research Compliance training courses are confirmed.

-Additional reviews are performed:

- **Facility Use Agreements:** IACUC protocols for non-Downstate PIs (PIs who are not paid Downstate employees) cannot be approved until a signed and executed Facility Use Agreement is in place.
- **Congruency Review:** Grant to protocol congruency review is the process by which Institutions ensure that all animal activity outlined in a grant application has been approved by the IACUC. The Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals ([Policy](#)) [IV.D.2.](#) and [V.B.](#), requires *institutions* to verify, before award, that the IACUC has reviewed and approved the components of the contract related to the care and use of live vertebrate animals. All vertebrate animal work for an award or contract administered by SUNY Downstate Health Sciences University as the primary recipient of funds must undergo a Congruency Review. There is no guarantee that the animal protocol will be approved by the IACUC, even if it has already been approved for funding by an extramural peer review process. Failure to submit the required Congruency Review materials will delay the release of funding.

## PROTOCOL REVIEW PROCESS

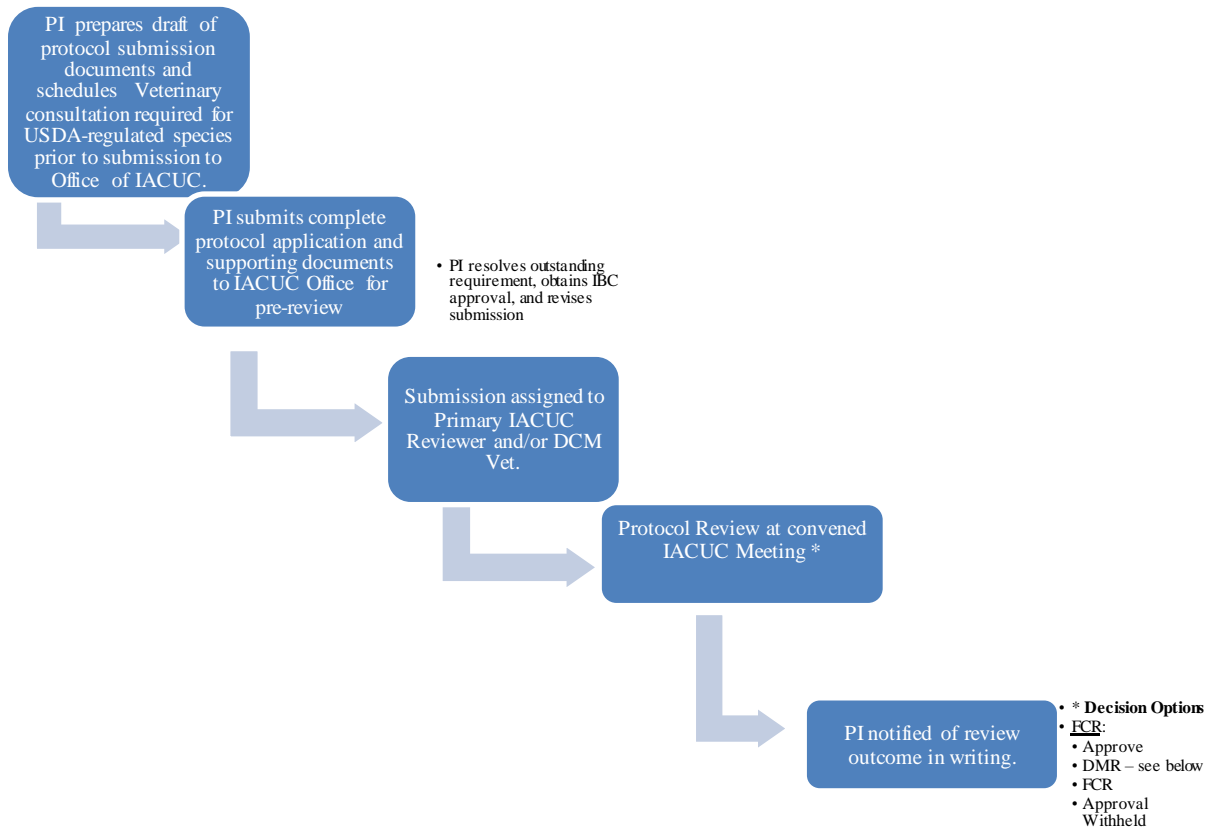
### **FULL COMMITTEE REVIEW (FCR)**

All initial and three-year renewal protocol submissions are reviewed by FCR. In addition, any member of the IACUC may request FCR of any protocol or amendment at any time. FCR takes place at a convened meeting with at least a quorum of the members present. No member may participate in the review of a protocol in which the member has a conflict of interest (e.g., personally involved in the project) except to provide information requested by the IACUC. Members with a conflict of interest do not contribute to quorum and depart the meeting prior to the vote on the protocol or amendment under review.

IACUC meetings are not public meetings. However, due to the complexity of a proposed protocol or amendment, the IACUC Chair may extend an invitation to a PI to attend a convened IACUC meeting in order to provide members with additional information and/or clarifications during the discussion of their protocol. Investigators are notified in writing of the outcome of the IACUC review within five business days after the convened meeting. For FCR, the outcomes include:

- *Approval:* requires a majority vote by the members. Protocols are approved for a maximum of 3 years, with some requiring annual review prior to the first and second anniversaries of the initial approval date at the discretion of the IACUC. Protocols not requiring an annual review will expire on the day prior to the third anniversary of the initial protocol approval date. See Annual Review Process below.
- *Modifications Required to Secure Approval* –
  - Deferred to Designated Member Review (DMR): requires a unanimous vote of the members; if the vote is not unanimous, the submission is returned to FCR. When protocols are deferred to DMR subsequent to FCR, the IACUC Chair designates the IACUC member(s) to review the response to the concerns. The proposed protocol cannot be approved until the DMR(s) agree that the concerns have been addressed, all outstanding training completed, and if applicable, the associated IBC approvals have been confirmed.  
If the concerns cannot be resolved during the DMR process, the submission is returned to FCR.
  - Returned to FCR: requires the request of at least one member
- *Approval withheld - disapproval:* requires a majority vote by the members. If the IACUC decides to withhold approval of an activity, it shall include in its written notification a statement of the reason(s) for its decision and give the principal investigator an opportunity to respond in-person or in writing. PIs who wish to respond to the IACUC in-person at a convened meeting must submit a formal request in writing to the IACUC Chair or the Office of the IACUC on or before the stated response deadline.

**Note: PI must respond to all IACUC comments and submit a revised application.**



### **AMENDMENT REVIEW PROCESS**

Amendments are changes to existing and active protocols. Amendment reviews must be conducted as per the SUNY Downstate Health Sciences University Assurance and the USDA Animal Welfare Act and Regulations, and must be consistent with PHS policy and OLAW expectations ([NOT-OD-14-126](#)). The type of review for proposed amendments to previously approved protocols will be assigned by the IACUC Chair or the Office of the IACUC staff. Significant changes may require a protocol revision. Investigators may not implement changes to an animal research protocol without prior approval from the [Institutional Animal Care and Use Committee](#) (IACUC), as it is a federal requirement and contractual agreement. Otherwise, PIs risk data loss, protocol suspension, and serious non-compliance. Any modification impacting animal health or welfare must go through an amendment process, often requiring consultation with the Attending Veterinarian, before the changes are performed. In most cases, amendments can be processed by DMR or administrative review.

### **DESIGNATED MEMBER REVIEW (DMR)**

Amendments (submitted as a protocol amendment form or as a revised version of the approved protocol in track changes format) that are processed by DMR include:

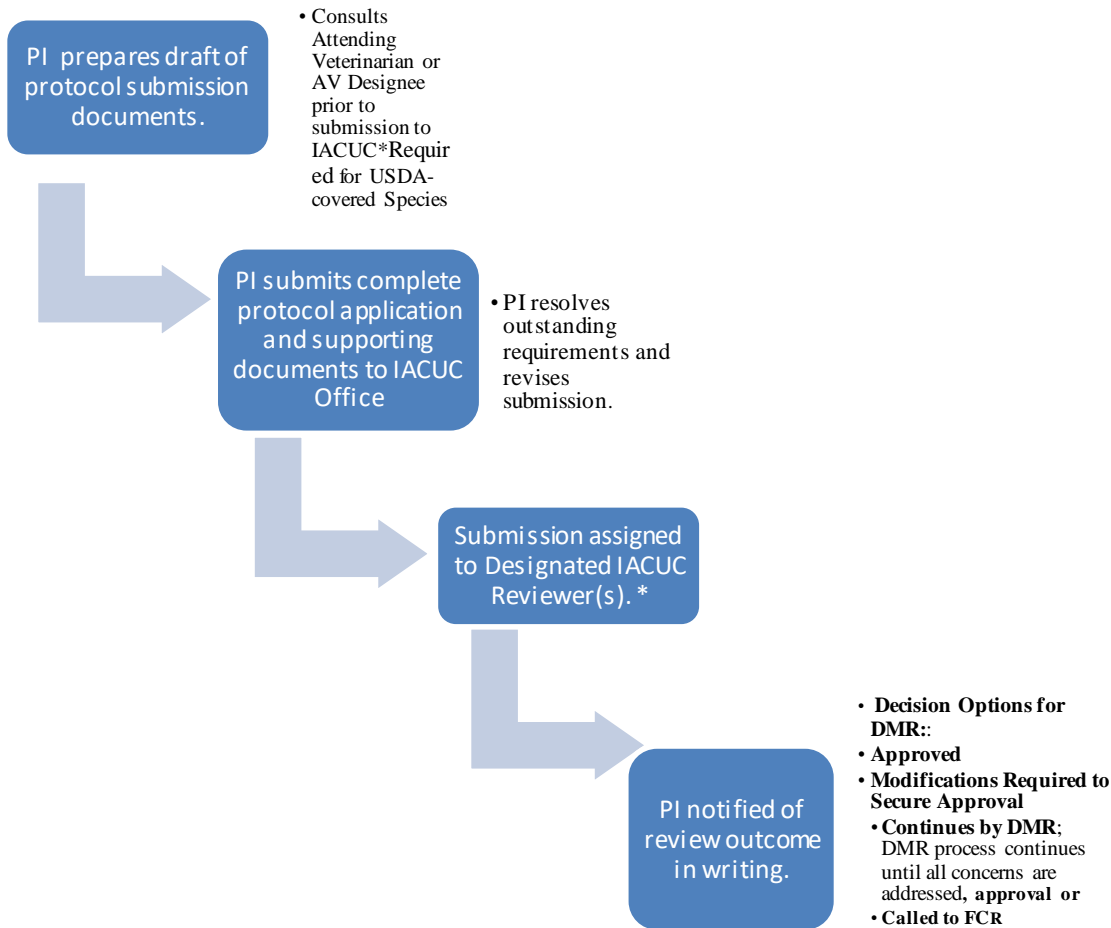
- changing from non-survival to survival surgery;
- changes resulting in greater pain, distress, or degree of invasiveness, such as:
  - Addition of survival surgical procedure.
  - Addition of a painful procedure.

- Change in protocol that would require an animal to undergo more than one survival surgery.
  - Change in protocol that would require animals to be fed, housed or cared for in a way that is not standard for that species, or does not meet that species' minimum requirements.
  - Increase in the degree of invasiveness of a procedure or discomfort to an animal.
  - Change in protocol that would eliminate or restrict an animal's access to veterinary care.
  - Change to withhold analgesics.
  - Change in protocol where death becomes the experimental end point.
- changes in housing and or use of animals in a location that is not part of the animal program overseen by the IACUC;
  - changes in purpose, specific aim or study objectives;
  - change in species;
    - Some changes in species require a separate animal protocol – i.e., changing from mouse to rat, or changing from pigs to sheep.
    - Some changes in species can be accomplished by amendment – i.e., addition of another species of rat (addition of *Rattus norvegicus* to a protocol that is approved for the use of *Rattus* ), or addition of another species of macaque (addition of *Macaca radiata* or *Macaca fascicularis* to a protocol that is approved for the use of *Macaca mulatta*).
  - an increase in number of USDA-regulated animals needed;
  - an increase in number of 30% or greater in the number of non-USDA regulated animals needed;
  - use of a non-pharmaceutical-grade substance for a reason or preparation other than those detailed below (see Administrative Amendments with Verified Veterinary Consultation);
  - changes in Principal Investigator (PI);
  - addition of personnel involving USDA-covered species
  - changes to personnel responsibilities including new and existing procedures involving USDA-covered species; and
  - changes that impact personnel safety.

These are examples of amendments that are reviewed by DMR. All IACUC members receive the submission by email, indicating that they have 72 hours to request clarifications or call for FCR. The IACUC Chair assigns specific DMR(s) to review the submission. Any clarifications requested by the DMRs are communicated to the PI. If no member calls for FCR within the 72-hour time frame detailed in the email, the DMR(s) will complete the review. The PI must address all comments/concerns, complete personnel training requirements, and obtain IBC approvals for the amended activities before the submission in order to obtain approval.

For DMR, the outcomes include:

- *Approval:*
- *Modifications Required to Secure Approval –*
  - If the concerns cannot be resolved, the submission is added to the next full committee agenda for FCR.
  - Call to FCR: requires the request of at least one DMR or the PI.



### Administrative Amendments with Verified Veterinary Consultation (VVC)

To minimize review time and reduce regulatory burden, certain protocol changes may be handled administratively by the Office of the IACUC staff or an IACUC Office designee in consultation with an IACUC authorized veterinarian (Attending Veterinarian (AV), or AV designee). This review process implements veterinary performance standards and professional judgment together with IACUC policies (e.g., guidance documents, standard operating procedures, drug formularies) for the conduct of animal activities. The veterinarian serves as a subject matter expert to verify that compliance with IACUC policy is appropriate for the animals affected by the proposed changes. Amendments that result in increased pain or distress to the animal, impact approved endpoint criteria, or impact approved personnel safety considerations may not be reviewed by this method. The veterinarian may refer any request to the IACUC for review for any reason and must refer any request that does not meet the parameters of IACUC policies.

Amendments that may be processed by VVC include changes in:

- Anesthesia, analgesia, or sedation.
  - *Anesthesia, analgesia, or sedation* – Reference material for anesthesia, analgesia, or sedation dosages may include textbooks (such as Harkness and Wagner’s Biology and Medicine of Rabbits and Rodents; Flecknell’s Laboratory Animal Anesthesia; Plumb’s Veterinary Drug Handbook; Hawk and Leary’s Formulary for Laboratory Animals; Lumb and Jones Veterinary Anesthesia and Analgesia; Quesenberry and Carpenter’s Ferrets, Rabbits and Rodents Clinical Medicine and Surgery; Carpenter’s Exotic Animal

Formulary; Fish, Brown, Danneman and Karas Anesthesia and Analgesia of Laboratory Animals); journal publications (peer reviewed from PubMed and CAB database), personal communications with a veterinary anesthesiologist; or IACUC Formularies.

- Experimental substances.
  - Changes in **substances that are the same class of compounds** (ex. Novel peptides, chemotherapeutic drugs) currently approved in the protocol and which are not expected to increase pain or distress, impact the approved endpoint criteria, or impact the approved personnel safety considerations.
  - Changes in **substances that are different types of compounds** than those currently approved in the protocol but which are not expected to change the objectives of the study, increase pain or distress, impact the approved endpoint criteria, or impact the approved personnel safety considerations - examples of the type of compounds includes: antibiotics, colloidal fluids, diluents/ vehicles (e.g., DMSO, diluted ethanol, corn oil, peanut oil, sesame seed oil, commonly formulated physiologic saline and buffer solutions, distilled water), imaging contrast agents, gene expression modulators (e.g., tamoxifen, tetracycline), etc. with published doses referenced in materials listed above for “Anesthesia, analgesia, or sedation”.
  - Injection with new tumor cell lines provided the tumor size and condition endpoints are consistent with the originally approved protocol but which are not expected to increase pain or distress, impact the approved endpoint criteria, or impact the approved personnel safety considerations.
- Use of non-pharmaceutical-grade substances, when pharmaceutical-grade alternatives are not available, for the following reasons:
  - An equivalent veterinary or human pharmaceutical-grade compound does not exist or it is unavailable.
  - The equivalent veterinary or human pharmaceutical-grade compound is not available in the appropriate formulation or concentration required.
  - Although there is an equivalent veterinary or human drug available, the chemical grade is required to replicate methods from previous studies.
  - The equivalent veterinary or human pharmaceutical-grade compound contains preservatives or inactive ingredients which may confound the research goals of the study.
  - with pH 6-8, and purity and sterility requirements are met:
    - Onsite manipulation with standard laboratory precautions using aseptic procedures
    - Use of sterile diluents
    - Use of sterile containers if prepared/maintained for >24 hours prior to use
    - >95% purity documented from vendor
- Euthanasia to any method approved in the [AVMA Guidelines for the Euthanasia of Animals](#).
- Change to animals of a different sex.
- Addition of another strain or breed of the same species.
- Duration, frequency, or type (e.g., blood collection site or volumes, route of administration, volumes, and dosages), or number of approved procedures contingent upon them not exceeding IACUC guidelines or resulting in increased pain or distress to the animal, impacting approved endpoint criteria, or impacting approved personnel safety considerations. *This cannot be used to add new procedures, but instead to make specific modifications to approved procedures.* These reviews are documented and communicated to the IACUC.

### **Administrative Amendments**

Specific protocol changes may be handled administratively by the IACUC Director, IACUC Administrator, or IACUC Post-approval Monitor without additional consultation or notification. Amendments are reviewed to address whether the requested change is in keeping with the original rationale for the number of animals approved; take into consideration if there is a change in study objectives; and take into consideration if the change may result in a negative impact on animal welfare. Examples include:

- Increase in numbers less than 30% of non-USDA regulated species
- Addition or removal of personnel (other than the PI) after verifying training requirements are complete
- Change in procedure locations that are part of the animal program overseen by the IACUC
- Correction of grammar or typographical errors.
- Contact information
- Change in protocol title
- Change in funding source.

### **ANNUAL REVIEW PROCESS**

Consistent with an amendment made to the Animal Welfare Act (AWA) regulations, Downstate's IACUC has eliminated the requirement that animal use protocols involving a United States Department of Agriculture (USDA) regulated species undergo an annual review.

Annual reviews may be performed for USDA-covered species protocols and any non-USDA covered species protocol, if required by the IACUC or funding agency. Annual Reviews must be received prior to the first and second anniversary of the initial or 3-year renewal approval date in order for the protocol to continue. The annual review must include a brief summary of the progress made over the past year towards the research goals, documenting any unanticipated adverse events or animal deaths prior to experimental endpoints, request to continue currently approved scientific reasons for single housing of social species, and requests to continue currently approved scientific justifications for not providing environmental enrichment. Annual reviews and approvals are performed by IACUC members. Members are notified at monthly convened IACUC meetings of upcoming annual reviews and have the opportunity to call for FCR.

### **Expiring Protocols**

Protocol approval is for a three-year period. All protocols will be terminated on the expiration date; extensions are not allowed under federal regulations or our PHS Assurance. Email notifications are sent to the PI three (3) months prior to the protocol expiration date stating that the protocol is expiring. The Office of the IACUC strongly recommends PIs submit a new application two (2) months prior to the expiration date.

If a new replacement protocol has not been approved prior to the expiration date, all experimental animal use must cease and no federal funds may be used to pay per diems or associated animal support costs.

### **IACUC Meeting Dates and Protocol Submission Deadlines**

Due to the time involved in preparing the materials for distribution to the IACUC members for review, all submissions must be received by the deadline date listed on the IACUC webpage. ***Only complete protocols will be reviewed by the IACUC; simply submitting a protocol by the deadline does not mean that the protocol is ready for Committee review.*** Submissions received after the deadline will be processed for the next convened meeting date.