

Avoiding Conflicts of Interest in the Leadership and Composition of the IACUC/OB

To ensure the integrity, independence, and credibility of the Institutional Animal Care and Use Committee or Oversight Body (IACUC/OB), institutions are expected to proactively identify, manage, and avoid conflicts of interest (COIs) in both membership composition and leadership roles. This is particularly important when individuals in positions of authority—such as the Institutional Official (IO) or Attending Veterinarian (AV)—serve as Chair or researcher. The IACUC/OB must function as an independent, objective body that provides impartial oversight of the animal care and use program. Undue influence, whether real or perceived, undermines ethical review, regulatory compliance, and public trust. Institutions are encouraged to give thoughtful consideration to the following factors to ensure avoidance of conflicts of interest in the leadership and composition of the IACUC/OB.

General Expectations

- The composition of the IACUC/OB should reflect a balance of expertise, perspectives, and independence consistent with applicable regulations and AAALAC expectations.
- All members should be encouraged to express concerns, request modifications, and vote without coercion or institutional pressure.
- Institutions should actively identify, disclose, and manage COIs for all members.

Conflicts of Interest in Membership

- A conflict exists when a member has a personal, professional, or financial interest that could compromise—or appear to compromise—their objectivity.
- Members with COI or potential COI must recuse themselves from review, discussion, and voting on protocols or programmatic issues in which they have a conflict.
- The IACUC/OB should document recusals and ensure quorum is maintained without conflicted individuals.

Leadership Considerations (Chair Role)

- The Chair plays a critical role in setting tone, ensuring fair deliberation, and protecting the independence of the committee.
- The Institution should appoint a Chair who does not hold a direct management role over the program being reviewed and is not responsible for institutional resource allocation decisions affecting the animal care and use program.
- The IO serving as Chair or as a researcher presents a significant potential COI due to the IO's authority over resources, compliance reporting, other committee members, and institutional priorities.

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- The Attending/Designated Veterinarian (AV) serving as Chair or as a researcher may also present a potential COI. The AV's role in program implementation and clinical decision-making may create perceived or actual COIs when overseeing aspects of the program they directly manage.

Some Safeguards and Best Practices may include

- Establish a written COI policy specific to the IACUC/OB.
- Establish a mechanism for periodic disclosure of potential conflicts and real-time disclosure during meetings.
- Appoint a Vice-Chair or alternate leader to manage discussions when the Chair has a conflict.
- Appoint an alternative veterinarian (including the use of external or independent expertise) to provide veterinary review when the AV has a conflict.
- Encourage a culture of openness, where raising concerns is protected and supported.