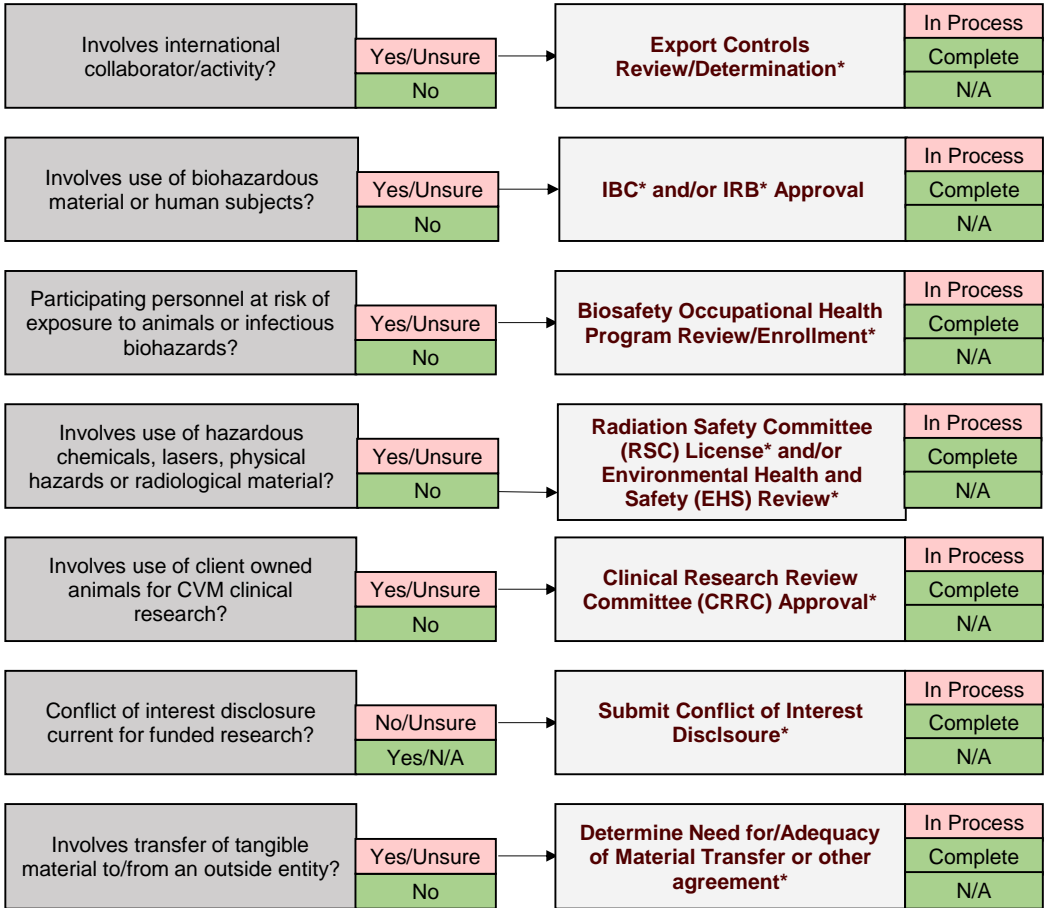


Research Road Map: Animal Use

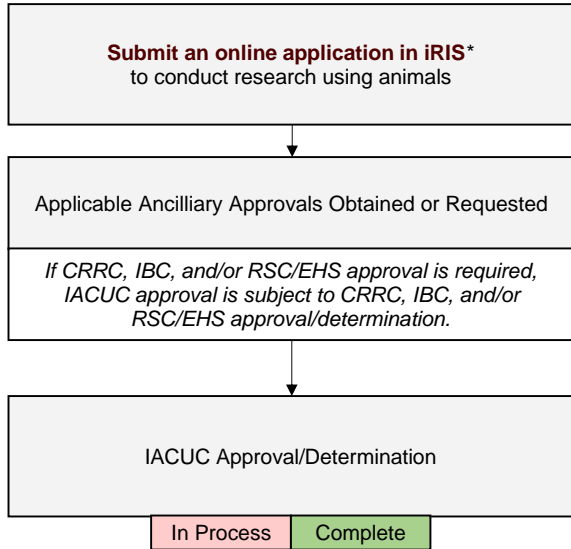
Research often involves specialized review by ancillary groups outside the IACUC. This tool provides examples of some ancillary reviews that may be required before research can begin. **Hover or click text within the tool for more information.** Ancillary reviews, if required, should be initiated by the PI in parallel with PI's IACUC submission. Requests for ancillary reviews should be directed to the applicable ancillary group.

Planning and Proposing Animal Use*

Seeking Ancillary Approval(s) related to Animal Use in research, teaching or testing activities



Seeking IACUC Approval to Use Animals in research, teaching or testing activities*



*Click link for additional information**

Initiate Research, Teaching or Testing Activities

Division of Research Contacts

- Animal Welfare Program/IACUC** animalcompliance@tam.u.edu, 979.845.1828
- Biosafety Program/IBC** biosafety@tam.u.edu, 979.862.4549
- Biosafety Occupational Health Program** boh@tam.u.edu, 979.845.6649
- Human Research Projection Program/IRB** irb@tam.u.edu, 979.458.4067
- Export Controls Office** exportcontrols@tam.u.edu, 979.862.6419
- Conflict of Interest/Commitment** coi@tam.u.edu, 979.862.6419
- Research Administration** https://vpr.tam.u.edu/manage-research
- Sponsored Research Services** https://srs.tam.u.edu/contacts, 979.862.6777

Other Texas A&M Contacts

- Radiation Safety Program** radiological-safety@tam.u.edu, 979.845.1361
- Environmental Health and Safety** eh@tam.u.edu, 979.845.2132
- Clinical Research Review Committee** https://vetmed.tam.u.edu/research/crrc

Resources

Information for Investigators https://rcb.tam.u.edu/animals/resources

FIVE TIPS FOR A SUCCESSFUL IACUC INSPECTION OR AAALAC SITE VISIT

▶ KNOW YOUR AUP

- ▶ Make sure everyone who works with animals has read the AUP and Amendments and is COMPLETELY familiar with the procedures approved in this document.
- ▶ These are the ONLY procedures that should be conducted with animals. Remember to review your AUP for accuracy and amend as needed.

▶ CHECK YOUR DRUGS

- ▶ Know what agents you use on/with/around animals and make sure everything is in-date.
- ▶ Discard expired materials* or label, “Expired, not for use in live animals” and store separately from in-date supplies.

***Applies to animal feed & medical materials as well**

▶ CHECK YOUR PEOPLE

- ▶ Has everyone had lab specific (and animal procedure specific) training?
- ▶ Is everyone enrolled in Occupational Health?
- ▶ Has everyone that works with animals been added to the AUP?
- ▶ Are people wearing lab appropriate clothes (and close-toed shoes)?

▶ CHECK YOUR EYEWASH

- ▶ Eyewashes must be flushed weekly (and documented).
- ▶ Make sure lab equipment (like fume and biological safety hoods and vaporizers) are in-date.

▶ CONFIRM ADHERENCE TO GUIDANCE

- ▶ Review applicable IACUC Guidance and request exceptions as needed in the AUP: <https://rcb.tamu.edu/animals/guidance>
- ▶ Ensure all required records are up to date (see AWO-O-052 for assistance).



Conflict of Commitment v. Financial Conflicts of Interest Disclosures

The following table provides an overview of the main characteristics of both Conflict of Commitment (COC) and Financial Conflicts of Interest (FCOI).

| | Conflict of Commitment (COC) | Financial Conflicts of Interest (FCOI) |
|-------------------------------|--|--|
| Policy Links | University SAP: https://rules-saps.tamu.edu/PDFs/15.99.99.M0.02.pdf | University Rule: https://rules-saps.tamu.edu/PDFs/15.01.03.M1.pdf System Regulation: https://policies.tamus.edu/15-01-03.pdf |
| University Webpage | https://vpr.tamu.edu/manage-research/COI/COI | https://vpr.tamu.edu/manage-research/COI/COI |
| Purpose (generally) | To provide a transparent system of disclosure of its employees' activities, external to the University, which might otherwise raise concerns about conflicts of commitment | To promote objectivity in research and to ensure that the research activities conducted by an investigator are free from bias resulting from financial conflicts of interest |
| Who Should Disclose | <ul style="list-style-type: none"> • Full-time members of the faculty with a 9-month or greater appointment, including for activities conducted outside their appointment periods • Full or part-time members of the faculty holding 50% or greater appointments • Part-time members of the faculty holding less than 50% appointments only if the activity reasonably appears to create a COC • Full-time professional and administrative employees • Part-time professional and administrative employees only if the activity reasonably appears to create a COC • Graduate student academic employees including, but not limited to, teaching assistants, instructional assistants, and research assistants <p style="text-align: center;"><i>If you do not have an activity, you <u>do not</u> need to submit a COC Form.</i></p> | <ul style="list-style-type: none"> • All "Investigators," which is defined as any person who is responsible for the design, conduct, or reporting of research, regardless of title or position <p style="text-align: center;"><i>All Investigators must submit a disclosure at least annually, even if they have nothing to disclose.</i></p> |
| What Must be Disclosed | <p>All external professional commitments (whether or not compensated) or external employment, <i>except</i> those commitments that are required or encouraged by the University as part of your professional development. These include:</p> <ul style="list-style-type: none"> • External employment or other compensated activities, including reimbursement of travel and other expenses, related to the employee's University responsibilities or professional expertise • Providing services as a voluntary or paid expert witness in the employee's individual capacity in any civil or criminal case • Providing private lessons in art, music or any field of study • Providing private counseling for financial aid, career development, and academic considerations • All service on external boards (excluding professional or scholarly organizations) • ANY uncompensated activity that reasonably appears to create a conflict of commitment <p style="text-align: center;"><i>Disclosure is limited to individual (no family members)</i></p> | <p>Any of the following that may be reasonably related to an Investigator's institutional responsibilities:</p> <ul style="list-style-type: none"> • Publicly traded entity – any remuneration received and/or equity interest in the preceding 12 months if the aggregate value exceeds \$5,000 • Non-publicly traded entity – value of any remuneration received in the preceding 12 months exceeding \$5,000, or when any equity interest is held • Intellectual property and royalty interests • Any reimbursed or sponsored travel, unless exclusion applies • Gifts if the aggregate value exceeds \$250 • Any fiduciary position in a for-profit or nonprofit entity if any form of remuneration or reimbursement for expenses was received <p style="text-align: center;"><i>Disclosure extends to covered family members (i.e., spouse, dependent children/stepchildren, or anyone living in the same household with whom the investigator is financially interdependent)</i></p> |
| Where to Disclose | Electronic COC Form: https://vpr.tamu.edu/forms/pdfs/conflict-of-commitment-form | FCOI Disclosure System: Maestro |
| Review and Approval | COC forms are approved at the Department/Unit level and the College and then sent to the COI Official/designee for review at coi@tamu.edu . | Disclosed interests are reviewed by the Conflict of Interest Official and/or designee for a determination as to whether a Financial Conflict of Interest exists. |



As a major research institution, Texas A&M University often has visitors to its campus who come to collaborate on research and scholarly topics of mutual interests or to work on specific research to be conducted within university facilities. These are referred to as visiting scholars. A visiting scholar is not an employee of Texas A&M or The Texas A&M University System.

Although, visiting scholars are not employees of the University, through the appropriate approval process, they can be allowed access to university facilities and resources, and issued a UIN, and NetID that will allow them to obtain an official Texas A&M email address, visitor identification card, and/or library card.

All individuals assigned under a visiting scholar title are subject to and are required to observe all applicable federal, state, and local laws, including, but not limited to, export control laws and regulations, and requirements of Texas A&M University rules and regulations, including intellectual property rights and obligations. The rules may be found at <https://rulesadmin.tamu.edu/rules/download/15.99.99.M0.01>.

Who is a Visiting Scholar?

A Visiting Research Scholar is an individual employed or affiliated with another organization who has been invited and approved by Texas A&M University to come to the campus for an extended period of time to collaborate on specific research, clinical, or other scholarly activities.

Who is not a Visiting Scholar?

Visitors who are 1. accompanied by authorized University personnel at all times; 2. do not need access to facilities or resources (i.e. UIN, NetID, library, parking, etc.); 3. are not performing “hands-on” research or teaching; AND 4. are visiting for a short duration of time (approximately 10 days or less) are not classified as visiting scholars. Examples of these visits include campus tours, conferences, collaboration meetings, presentation of a paper, etc.

Approximately 1,000 visiting scholars approved to come campus each year (pre-COVID)

*Visiting research scholars from 108 countries
80+ languages*



Responsibilities:

| | |
|----------------------------------|---|
| Host Faculty Member | <ul style="list-style-type: none"> • Complete the Visiting Scholar/International Visiting Scholar/Exchange Visitor Request Form (5VS), including obtaining approval from the Department Head and Dean (or designee) • For international visiting research scholars: Contact ISFS to prepare appropriate visa paperwork • Complete the Export Controls & Embargo Training - Basic Course 2111212 in SSO • Review Guidance—Foreign Influence in Research if the Visiting Scholar will conduct activities on a federally sponsored research award • Inform visitor of applicable lab protocols and trainings • Assign an alternate/back-up supervisor if traveling for an extended period during visitation period • Notify ECO if duration, purpose or location of visit changes • Notify compliance committee if applicable (IRB, IACUC, IBC) • If working on a sponsored award, ensure any sponsor requirements are met and visiting scholar is aware of applicable terms and conditions |
| Visiting Research Scholar | <ul style="list-style-type: none"> • Provide information to TAMU Department sufficient to allow them to prepare the Visiting Scholar Application and to assure eligibility for status • Sign the Visiting Scholar Agreement or other agreement addressing Intellectual Property and/or sensitive information • Follow all University rules and policies • Follow all federal and state laws • Report any IP rights or obligations that may conflict with being a visiting research scholar • May not represent self as an employee of the University • Only using access to facilities and resources for the purposes of their assignment and not sharing these resources |

What are export controls?

Export Control laws and regulations establish the conditions under which controlled information and items can be transmitted to anyone outside the United States and to foreign persons and entities in the United States. They also restrict or prohibit the transaction of business with certain countries, persons and entities that have been sanctioned by federal agencies as a threat to important U.S. interests. All Texas A&M employees and students must be aware of and are responsible for the export control implications of their work and must ensure that their activities comply with export control laws and regulations.

Where do export regulations come from?

Several federal agencies implement export control rules and regulations. Each agency possesses jurisdiction over specific types of technology or restricted trade. The most relevant agencies are referenced below:

- The U.S. Department of Commerce, through the Bureau of Industry and Security, administers the Export Administration Regulations (EAR; 15 C.F.R. 730). EAR regulates “dual-use” items and related technology, which are primarily designed for commercial purposes, but which could have military applications, such as computers, aircraft, and pathogens.
- The U.S. Department of State, through the Directorate of Defense Trade Controls (DDTC), administers the International Traffic in Arms Regulations (ITAR; 22 C.F.R. 120-130). ITAR regulates items and information inherently military in design, purpose, or use. Controlled items are referred to as “defense articles” and are included on the U.S. Munitions List (USML).
- The U.S. Department of the Treasury, Office of Foreign Assets Controls (OFAC; 31 C.F.R. 500), administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals with regard to certain countries. OFAC regulations can severely restrict transactions, such as prohibiting the transfer of anything of value to certain countries.

How do export control issues arise in the university setting?

Export control regulations can apply in many situations, including but not limited to: taking a computer or other equipment out of the country; engaging in transactions or providing services to certain individuals, entities or countries; accepting publication restrictions or other restrictions on the distribution of research results; foreign person involvement in teaching or research activities related to controlled equipment or technology; conducting work and/or research from abroad; and other international activities. Most university teaching and research will fall under exclusions to export control regulations (i.e. fundamental research, public domain/public information, educational information exclusions).

What happens if export control laws are violated?

There are severe institutional and individual sanctions for violations of export control laws and regulations, including loss of research funding, loss of export privileges, and criminal or civil penalties.

What is an export?

An “export” generally includes:

- Physical shipment of goods, items, or biologicals out of the United States;
- Electronic transfer of any controlled technology or information;
- Release or disclosure, including verbal disclosures and visual inspections, of controlled technology, software or technical data to any foreign person or entity; and
- Use or application of controlled technology on behalf of or for the benefit of a foreign entity or person, regardless of location.

When a controlled item or information is transmitted to a foreign person or entity in the United States, it is known as a “deemed export”.

For more information contact: Export Controls Office, Division of Research, (979) 862-6419, exportcontrols@tamu.edu. Export Control website - <https://vpr.tamu.edu/initiate-research/export-controls>.



Export Control Review Form: International Shipping

INSTRUCTIONS: Shipper should complete this form for all international shipments leaving the United States (including hand-carried items taken on travel). Please complete electronically if possible. If you must hand-write responses, please ensure the responses are clear and legible. Once complete, please email to exportcontrols@tamu.edu. We will review the shipment for export controls compliance and return our determination to you.

NOTE: This form is to be used only for Texas A&M University items/projects. If the shipment is related to property or projects for another system member, please work with the respective export control office for review.

Department:

Name of Shipper/Traveler:

Email:

Name of Principal Investigator/Supervisor/Director Overseeing Activity:

Project Number, if applicable:

Method of shipping (check one):

USPS UPS FedEx Freight Forwarder, specify:

hand-carry by TAMU personnel

Other, specify:

Duration of Export (check one): permanent temporary, specify dates:

Country of Destination:

Any other Countries to be shipped or traveled through:

Recipient Entity Name (name of university, company, etc.):

Recipient Individual Name(s):

Shipping Address:

Identify End-User(s), if different than Recipient:

Your relationship or affiliation with the Recipient/End-User:

Describe specifically how the End-User will use the items:

Reason for Shipment and Benefit to Texas A&M University:



Export Control Review Form: International Shipping

Type of items to be shipped (check all that apply):

Equipment Biologicals Chemicals Materials Software

Other, specify: _____

In the fields below, please describe in detail the exact contents of the shipment. Use lay terms and define acronyms/abbreviations. If shipment contains multiple items, please attach an electronic spreadsheet that includes the following details separately for each item.

Item Description:

All Equivalent/Alternate Names for Item:

Manufacturer and/or Vendor:

Model Number (if applicable):

Web Link to Product (if applicable):

Quantity:

Value:

Export Control Classification (if known):

Schedule B or HTS Number (if known):

Country of Origin:

Item Owner:

Texas A&M Asset Number (if applicable):

[This Section for Export Control Office Use Only]

ECO File Number:

Reviewed by:

Export Authorization:

No License Required (NLR)

License Exception, specify:

License Required

AES EEI Filing Required: yes no

Notes:

EXPORT CONTROL GUIDANCE DRONES

Unmanned Aerial Vehicles (UAV) and Unmanned Aircraft Systems (UAS), commonly referred to as “drones”, are increasingly popular tools in research. There are several export control considerations that custodians/users of drones should be aware of, as detailed below:

- DJI (Da-Jiang Innovations), a well-known drone manufacturer headquartered in China, is on the United States Bureau of Industry and Security (BIS) Entity List. Depending on the scenario, the shipment of items to DJI, including drones for return or repair, may be prohibited. Contact the Export Controls Office for a thorough review prior to making any shipment to DJI.
- While there is not a strict prohibition on the purchase or use of DJI drones for Texas A&M University, it is recommended to purchase alternative equipment, preferably from a United States manufacturer, whenever possible. (please note other Texas A&M System members or agencies may have different restrictions on the purchase of DJI drones)
- Drones, including but not limited to those from DJI, may automatically send flight telemetry data to the manufacturer. Sending this data to the manufacturer could be a prohibited export. The best way to prevent an unauthorized export is to **manually disable** this feature upon receipt of the drone, prior to first use.
- Some drones are more highly controlled than others, which can impact how, where, and by whom a drone may be used. Specifications such as range, payload, and speed, as well as special capabilities, determine the specific export control classification. Please contact the Export Controls Office for questions regarding export controls for equipment, especially before an anticipated export.
- Certain drone modifications, accessories, or attachments, such as cameras or lasers, may have export controls above the control level of the drone itself. Please contact the Export Controls Office for questions regarding export controls for equipment, especially before an anticipated export.
- Department of Defense (DoD) has restrictions on the procurement of drones and related equipment and services from China. Any researchers with DoD funding who have concerns over the procurement or use of drones should contact the Export Controls Office.
- In addition to export controls, drone users must comply with other regulations and procedures. Contact [Texas A&M Environmental Health and Safety](#) for all drone compliance questions not specifically related to export controls.

[Texas A&M University Export Controls Office](#)

Email: exportcontrols@tamu.edu