Protocol non-compliance occurs when procedures or policies approved by the IACUC are not being followed. Examples include performing unauthorized surgery, unauthorized persons participating in a research project, or injecting drugs that the IACUC has not approved. When faced with protocol noncompliance, the IACUC’s first step, if possible, should be to find a way to bring the protocol into compliance.

If allegations of animal mistreatment or protocol non-compliance are verified, the IACUC can apply sanctions. If, in the opinion of the IACUC, sanctions are not appropriate, they need not be applied. A clearly minor and unintentional misinterpretation of an IACUC policy that has created no problem for an animal is an example of where a verified allegation of protocol non-compliance might lead to an explanation, not a sanction.

6.3.1 Consequences of Noncompliance
Subsequent actions of the IACUC may include:

- Implementing measures to prevent recurrence;
- Notifying the IO and the AV of its actions;
- Notifying funding or regulatory agencies, as required; and/or
- Notifying the complainant, any persons against whom allegations were directed, and pertinent program officials (appropriate supervisory and management staff, the public affairs office, institutional attorneys, etc.).

6.3.2 Institutional Sanctions
Examples of institutional sanctions that have been devised include:

- counseling;
- issuing letters of reprimand;
- mandating specific training aimed at preventing future incidents; monitoring by the IACUC or IACUC-appointed individuals of research, testing, or training that involving animals;
- temporary revocation of privileges to provide animal care or to conduct research, testing, or training that involves animals, pending compliance with specific, IACUC-mandated conditions;
- permanent revocation of privileges to provide animal care or to conduct research, testing, or training that involves animals; and
- recommending to the IO that institutional (e.g., reassignment, termination of employment) sanctions be imposed.
6.3.3 Suspension of Animal Activities

The IACUC is empowered to suspend a project if it finds violations of University policy, PHS Policy, the Guide, Assurance, or Animal Welfare Regulations. Suspension may occur only after review of the matter at a convened meeting of a quorum of the IACUC, and a vote for suspension by a majority of the quorum present. Further, the IACUC must consult with the Institutional Official regarding the reasons for the suspension.

The Institutional Official is required to take appropriate corrective action, and report the action and the circumstances surrounding the suspension to OLAW. Because an IACUC action to suspend a project is a serious matter, the action must be reported to OLAW promptly. Failure by research personnel to follow Federal and/or University regulations, guidelines, policies and/or procedures may require reporting to the appropriate institutional, local, state and/or Federal agencies.

Violations may include, but not limited to:

- Serious or continuing non-compliance with the PHS Policy;
- Serious deviations from the Guide for the Care and Use of Laboratory Animals; and
- IACUC suspensions.