**IACUC Guidelines**

**Guidance for Determining USDA “Field Study” Exemption for Annual Reporting**

**Guidance from USDA**

*The USDA Animal Welfare Act (AWA) states that field studies are exempt from the USDA requirement*

*for IACUC review (section 2.31. d.1). It defines a field study as “a study conducted on free-living wild*

*animals in their natural habitat. However, this term excludes any study involving an invasive*

*procedure, harms, or materially alters an animal's behavior under study” (section 1.1).*

This AWA definition of field study is relatively general in that it does not define keywords including

“invasive,” “harm,” or “materially alter.” Instead, the USDA allows individual IACUCs the latitude to

define these terms and then use their definitions to determine whether a particular study qualifies as a

USDA field study and, thus, would be exempt from reporting. The USDA may review the IACUC’s

rationale behind their determination of whether the proposed work falls under the USDA definition of a

field study. Therefore, these guidelines have been developed to provide the UM IACUC rationale

behind decisions on whether work performed in the field qualifies as a USDA field study.

Additionally, the USDA, APHIS Animal Care Inspection Guide states that “animals euthanized, killed, or

trapped, and collected, such as for study or museum samples, from their natural habitat via humane

euthanasia” is not to be included in the USDA annual report.

The Animal Welfare Act states, “Euthanasia means the humane destruction of an animal accomplished by a method that produces rapid unconsciousness and subsequent death without evidence of pain or distress, or a method that utilizes anesthesia produced by an agent that causes painless loss of consciousness and subsequent death.” Accordingly, both chemical agents and commercially available kill traps are considered euthanasia, and,

therefore, the killing of animals in the field by these methods does not exempt a study from being

considered a “field study” for USDA purposes. Furthermore, a rare accidental death that occurs during

the use of live traps does not prohibit the study from being classified as a field study.

**University of Montana (UM) Definitions Pertaining to Field Studies:**

* Invasive procedure: Any procedure, other than that associated with an approved euthanasia method,

 that exposes underlying tissues or enters a body cavity other than the mouth, nostrils, or short

 distance into the rectum.

* Harm: More than momentary pain or distress. It does not include confinement without injury in a live trap that allows the captured animal some free movement.
* Materially altered behavior: Behavior that, upon the release of the animal, is functionally different than

 its pre-capture behavior beyond that which relates to the likelihood of the animal being captured

 again, using the same trapping method (i.e., the development of trap avoidance or trap happiness).

* “Functionally different” is defined in terms of reproductive and survival success.

**Examples**

Determination of whether proposed fieldwork qualifies as a USDA field study is made on a case-by-case

basis by the IACUC based on the above definitions. However, below are examples of procedures that

would make the proposed work suitable for classification as a USDA field study.

A USDA field study may include the following procedures:

* Live-trapping animals in traps that are designed not to injure the animal and allow for some free

 movement

* Short-term handling of animals at the site of capture or a nearby field processing location
* Collection of external morphometric data
* Marking the external surface of the animal via hair clipping or visible marking techniques (e.g.,

 Sharpie pen, picric acid on fur or feathers)

* Swabbing of the mouth, nostrils, or rectum
* Injection of sterile liquids or materials (e.g., transponder tags) that are not expected to

 materially alter an animal’s activity or behavior

* Ear punching or clipping in rodents
* Blood collection through a needle, hematocrit tube, or by way of a skin nick
* Attaching external bands, tags, or transponders to limbs, neck, feathers, or ears
* Sedation or anesthesia is used to immobilize an animal rather than to provide analgesia
* Euthanasia by inhalation, chemical injection, or commercially available kill trap

**A USDA field study may not include any of the following procedures:**

* Surgical procedures that expose underlying tissues
* Endoscopic procedures
* Stomach or colonic gavage
* Toe-clipping
* Delivery of chemicals (e.g., glucocorticoids, sex steroids) via injection, patch, or implant that may

 alter an animal’s activity or behavior

* Transport of animals away from the area of capture beyond that required to get the animal to

 the field processing location

* Release of an animal away from its site of capture
* Any other procedure that would reasonably be expected to cause more than slight or

 momentary pain or distress in a human being to which that procedure is applied

**Studies conducted in the wild outside the United States**

In addition, field research, even if it includes invasive procedures, harm, or material alteration of

behavior, that is conducted outside the United States is exempt from USDA reporting since it is not

within the jurisdiction of the USDA.

**UM IACUC oversight of studies conducted in the wild**

While field studies, as defined in the AWA, and foreign field research are exempt from USDA animal

welfare regulations, AAALAC International makes no distinction between laboratory and field studies,

and thus, requires all research and teaching conducted by AAALAC-accredited institutions in the field,

regardless of the location, to have some degree of IACUC oversight based on risk assessment,

harm/benefit analysis, and hazard identification. Furthermore, the Office of Laboratory Animal Welfare

(OLAW) requires IACUC review and approval if the fieldwork alters or influences the activity of the study

animal.

Accordingly, independent of the determination of whether a study qualifies for a USDA exemption as a

field study, any study conducted in the wild regardless of location that requires the handling of a

vertebrate animal or significantly disturbs their normal behavior must receive UM IACUC approval prior

to being conducted. Determination of whether a study will significantly disturb normal behavior is

decided on a case-by-case basis by the IACUC and Attending Veterinarian, who may seek guidance

from subject experts within and outside UM. Thus, all fieldwork requires UM IACUC review and approval and the USDA definition of field study mainly influences which free-ranging mammals used in research and teaching need to be reported to the USDA.