POLICY

To protect the integrity of the institution and its researchers, IACUC members must not: a) Disclose confidential or proprietary information (protocol or investigator specific information) to any non-IACUC member or, b) discuss or disclose any details of IACUC business (e.g., protocol reviews, non-compliance discussion, subcommittee investigations or reviews, etc.) to third parties without the consent of the IACUC Chair/designee.

To adequately evaluate the humane and ethical use of animals, it is necessary to have a free and open exchange of information. However, material provided to the IACUC for their review shall be considered confidential information and the members must, therefore, assure the confidentiality of the data contained therein. All IACUC applications and other sensitive materials must be filed in a secure location, returned to a designated IACUC administrator, or otherwise disposed of in an appropriate manner, e.g. shredding.

Public Law 99-158, “Animals in Research”, requires that research institutions not publicly disclose trade secrets or commercial or financial information which is privileged or confidential (Sec. 495 (e); ref. 3). Under the Animal Welfare Act IACUC members who violate confidentiality regarding “trade secrets” or other proprietary information may be subject to significant fines. These provisions are not intended to discourage participation on the IACUC, but rather to protect institutions. It should be noted that the USDA Animal Welfare Act Regulations (which implement the Animal Welfare Act itself) state that no one should be discriminated against or be subject to any reprisal for reporting violations of any regulation or standards under the Act. IACUC member training must ensure the attendees understand their responsibilities, including the requirement to maintain confidentiality.

The IACUC views the sharing of information for educational purposes in faculty and staff meetings an important benefit of department representation and is considered to be a vital part of the member’s experience. This information may include such items as IACUC concepts, policies, regulations, and educational issues, providing no specific personal, confidential, or proprietary information is divulged.

REQUIREMENTS

Public Law 99-158, “Animals in Research”
Requires that research institutions not disclose publicly trade secrets or commercial or financial information which is privileged or confidential (Sec. 495 (e); ref. 3). Therefore, the Public Health Service (PHS) requires that all material reviewed by IACUCs should be treated as confidential.

Animal Welfare Act (7 U.S.C. § 2157)
“(a) It shall be unlawful for any member of an Institutional Animal Committee to release any confidential information of the research facility including any information that concerns or relates to- (1) the trade secrets, processes, operations, style of work, or apparatus; or (2) the identity, confidential statistical data, amount or source of any income, profits, losses, or expenditures, of the research facility."

Animal Welfare Act (9 CFR 2.32(c)4)
“Methods whereby deficiencies in animal care and treatment are reported, including deficiencies in animal care and treatment reported by any employee of the facility. No facility employee, Committee member, or laboratory personnel shall be discriminated against or be subject to any reprisal for reporting violations of any regulation or standards under the Act.”
Privacy, Confidentiality and Information Security Policy 6045 UNMC

It is the policy of the University of Nebraska Medical Center (UNMC) to comply with all applicable federal, state, local regulations and University policies and procedures governing confidentiality, privacy and information security. Breach of confidentiality may result in sanctions, civil or criminal prosecution and penalties, scholastic or employment corrective action which could lead to dismissal or, as it relates to health care professionals or others outside of UNMC, suspension or revocation of all access privileges. UNMC workforce and business associates with access to private and/or confidential information will be held accountable for maintaining confidentiality.