

Policies for Research Studies Involving Comfort Dogs at Concordia University Wisconsin/Ann Arbor (CU)

(approved 9/11/14)

Animal Welfare Act regulations and Office of Laboratory Animal Welfare (Public Health Service) policy state that animals used in research, teaching, testing and training fall under the oversight of Institutional Animal Care and Use Committee (IACUC). However, the day-to-day "working" activities of the Comfort Dog (CD) do not fall under the IACUC area of responsibility. Moreover, the research, teaching, testing, and training umbrella is open to interpretation and often involves nuances that are difficult to discern even for trained personnel. Currently, there are no policies/procedures for conducting mammalian animal research established at CU. Therefore, it is critical that any proposed research involving a CD not be construed as animal research. Accordingly, the CU IACUC has promulgated the following procedures, guidelines, and rules that should be followed when an investigator proposes a study that involves a CD in any manner.

Procedures: Any study involving CDs will be submitted to CU's Institutional Research Board (IRB) for approval. It will receive full board review by the IRB. The IRB, with input from the CD's "Top Dog" (lead handler), will determine whether the research is an appropriate use of the CD in accordance with the contractual arrangements with Lutheran Church Charities and ensure that the CD is a passive participant in the study in accordance with the guidelines provided below. The IRB will notify the IACUC of and make available to the IACUC any protocol involving the CD submitted to the IRB for review. The IACUC is the final authority on whether the proposed research is or is not animal research. Each year the Office of Institutional Research will provide a summary of the research activities in which the CD participated to the IACUC.

Guidelines on the type of study that may/may not be conducted involving CDs:

1. Research should be focused on human reactions to the CD performing its normal "duties." Examples of research that would be acceptable would include but not be limited to the following:
 - a) observations of humans interacting with the CD;
 - b) surveys documenting the effectiveness of the CD;
 - c) research focused on the human response to the CD in its work environment.

2. Research should not be focused/designed so that the:
 - a) CD's behavior is assessed in any manner;
 - b) CD wouldn't be involved if the investigator weren't conducting a study;
 - c) CD (or its handlers) are required to do any investigator-directed action (i.e., the CD must always act as she has been trained to act with no experimental intervention from the handler or investigator);
 - d) participants do not interact naturally with the CD but approach with a specific agenda (i.e., the investigator cannot ask the subjects to approach the CD in a specific emotional state or from a certain direction);
 - e) participants are required, encouraged, or receive recommendations that physical contact between them and the CD (e.g., petting) goes above or beyond the normal CD interaction with the CU community;
 - f) IACUC would interpret the activity as animal research.

Rules for designing a study involving interaction with CDs:

1. Handlers trained to handle the CD in a research setting must be used.
2. Two handlers must be present in the research setting.
3. The investigator may not ask the handlers to have the CD perform any behavior that is not part of her normal command responses.
4. Any interaction can be terminated at the handler's discretion regardless of the investigator's agenda.
5. The handler can terminate the research session if s/he ascertains that it is in the best interests of the CD (fatigue, "bathroom" break, etc.)
6. The CD's normal working schedule, including unexpected crisis interventions, take precedence over research observations even though it would result in postponement or cancellation of a planned research observation.
7. Any investigator who interferes with the CD's handlers' duties will permanently lose the privilege of conducting research with the CD.