POLICY

The IACUC shall review and approve, require modifications in (to secure approval), or withhold approval of activities related to the care and use of animals. This policy pertains to all proposed protocols, proposed significant changes, and re-reviews of approved protocols related to the care and use of animals.

The PHS Policy and AWRs recognize two methods of protocol review: Full Committee Review (FCR) and Designated Member Review (DMR). However, it should be noted that any IACUC member, at any time, for any reason can request FCR of any protocol even after it is approved and activated. Protocols classified as pain category C and D1 generally qualify for DMR. However, protocols that use USDA-regulated animals, use animals for education or training, use a large number of animals or have other identified concerns may not qualify for DMR as determined by the IACUC Chair on a case by case basis. Category D2 and E protocols, with few exceptions as determined by the IACUC Chair on a case by case basis, require FCR at a convened meeting.

In addition to FCR and DMR, this institution also utilizes 1) Administrative Veterinary Verification and Consultation (AVVC) for significant changes outlined in OLAW Guidance #NOT-OD-14-126 and further specified in this policy and 2) Administrative Handling (AH) for: a) administrative concurrence of research conducted, reviewed and approved at another PHS Assured Facility but supported either by a contract, grant or gift awarded to the Regents of the University of Nebraska and administered by UNMC, including money from extramural sponsors, money awarded by the University of Nebraska under a University-managed research program, or any other internal University award appropriated for research support and b) minor changes defined as those that do not meet the criteria for a significant change based upon guidance provided by the Office of Laboratory Animal Welfare (OLAW). However, all submitted changes are evaluated to determine the appropriate review, and at any time it may be determined that any change will be reviewed by Full Committee (FC) or Designated Member Review (DMR).

The investigator should carefully examine all procedures to be applied to animals and determine his or her best estimation of the level of pain, discomfort and distress and designate the appropriate pain category. The pain category will be assessed by the IACUC Chair or IACUC Administrator to determine the type of review, but final determination will be made by the IACUC Committee following review.

All personnel proposing to use a live animal in research, training, education, experimentation, biological testing or for related purposes must submit a completed IACUC Application form (hereafter referred to as protocol) to the IACUC Administrative Office. Submissions are reviewed by either FCR or DMR.

A significant change is based upon guidance provided by OLAW. Examples of significant changes include but are not limited to the following: change in the aim(s) of the study; any change in or addition of a species; more than a minor increase in numbers of animals which is determined by the species and total number of animals initially approved; change in pain category; change in the duration, frequency or number of procedures performed on an animal; change in pain relieving regimen; change in euthanasia; change in invasiveness; addition of a surgical procedure; change from non-survival to survival surgery; change in endpoints; or change in principal investigator.
Proposed changes must be submitted to the IACUC by completing a Request for Change form and revising the approved protocol by incorporating the change as applicable. Submissions are reviewed by FCR, DMR, AVVC or AR. Significant changes already classified as D2 or E typically qualify for DMR. Changes that increase the pain category to D2 or E require FCR with few exceptions as determined by the IACUC chair on a case by case basis.

The IACUC will re-review all protocols of each previously approved, ongoing activity covered by the PHS Policy no less often than every three years, and for protocols utilizing USDA regulated species, continuing review will be conducted no less often than annually. Investigators are required to submit an application for 3 Year Review in accordance with the continuing review dates set by the IACUC. Annual and continuing reviews are typically conducted by FCR to maintain consistent review dates but can be reviewed by DMR when applicable as described above.

**REQUIREMENTS**

The Public Health Service (PHS) Policy, Section IV.B 7 and the United States Department of Agriculture (USDA) Animal Welfare Act and Regulations (AWAR) 9 CFR 2.31(7) require the IACUC to "review and approve, require modifications in (to secure approval), or withhold approval of proposed significant changes regarding the use of animals in ongoing activities . . ."

The Public Health Service (PHS) Policy Section IV.C 1-8 and the United States Department of Agriculture (USDA) Animal Welfare Act and Regulations (AWAR) 9 CFR 2.31(d) stipulate “In order to approve proposed research projects or proposed significant changes in ongoing research projects, the IACUC shall conduct a review of those components related to the care and use of animals and determine that the proposed research projects are in accordance with this policy. In making this determination, the IACUC shall confirm that the research project will be conducted in accordance with the Animal Welfare Act insofar as it applies to the research project and that the research project is consistent with the Guide unless acceptable justification for a departure is presented. Further, the IACUC shall determine that the research project conforms to the institutions Assurance and meets the requirements as contained in these regulations.”

National Institutes of Health, Office of Extramural Research, Office of Laboratory Animal Welfare, Notice NOT-OD-09-035, January 8, 2009 Guidance to IACUCs Regarding Use of Designated Member Review (DMR) for Animal Study Proposal Review Subsequent to Full Committee Review (FCR)

National Institutes of Health, Office of Extramural Research, Office of Laboratory Animal Welfare, Notice NOT-OD-03-046, June 6, 2003 Office of Extramural Research Revised Guidance Regarding IACUC Approval of Changes in Personnel Involved in Animal Activities: “…IACUCs may, by institutional policy, classify certain proposed additions and changes in personnel, other than the Principal Investigator, as "minor" provided that an appropriate administrative review mechanism is in place to ensure that all such personnel are appropriately identified, adequately trained and qualified, enrolled in applicable occupational health and safety programs, and meet other criteria as required by the IACUC.”

National Institutes of Health, Office of Extramural Research, Office of Laboratory Animal Welfare, Notice NOT-OD-14-126, August 26, 2014, Guidance on Significant Changes to Animal Activities, Certain specific significant changes must be reviewed and approved by either FCR or DMR; other specific significant changes may be administratively handled using an IACUC-established mechanism of veterinary verification and consultation when there is an IACUC policy that addresses the specific significant change.

National Institutes of Health, Office of Extramural Research, Office of Laboratory Animal Welfare, Notice NOT-OD-01-017, February 12, 2001, Office of Extramural Research Guidance Regarding Administrative IACUC Issues and Efforts to Reduce Regulatory Burden: “…OLAW and APHIS agree that review of a research project or evaluation of a program or facility by more than one recognized IACUC is not a federal requirement.” It further states, “If both institutions have full PHS Assurances, they may exercise discretion in determining which IACUC reviews research protocols...."
OLAW Frequently Asked Questions, Examples of changes considered to be significant include, but are not limited to, changes:
◦ from non survival to survival surgery;
◦ resulting in greater pain, distress or degree of invasiveness;
◦ in housing and/or use of animals in a location that is not part of the animal program overseen by the IACUC
◦ in species
◦ in study objectives
◦ in Principal Investigator
◦ increase in previously approved animal numbers
◦ that impact personnel safety
◦ in anesthesia, analgesia, sedation or experimental substances
◦ in euthanasia to any method approved in the AVMA Guidelines for the Euthanasia of Animals and
◦ in duration, frequency, type or number of procedures performed on an animal

PROCEDURE

1.0 Designated Member Review (DMR):

1.1 Each eligible protocol is distributed to the entire IACUC with specific instructions regarding the designated review process and a deadline to call for FCR which is generally 2-5 business days. Affirmation from all IACUC members is not required.

1.2 Under extenuating circumstances, the deadline can be reduced by the IACUC Chair/designee to one day with affirmation required from all members regarding their decision whether or not to call for FCR.

1.3 At least one member of the IACUC is assigned by the chair as the designated reviewer (DR) who is qualified to conduct the review. If multiple designated reviewers are used, their decisions must be unanimous; if not, the protocol will be referred for FCR.

1.4 Any member of the IACUC can make the decision to send the protocol for FCR at any time during the set deadline period. If no member of the IACUC refers the protocol to full committee for review at a convened meeting, at the end of the set deadline period the assigned IACUC DR(s) has/have the authority to approve, require modifications in (to secure approval) or request full committee review.

1.5 The DR(s) do not have the power to withhold approval.

1.6 The IACUC minutes contain notification of all actions approved by DMR.

2.0 Full Committee Review (FCR):

2.1 Full committee review of protocols requires a convened meeting of a quorum of the IACUC members. A simple majority of the membership of the IACUC constitutes a quorum and is required in order to convene a meeting for the review of protocols. For a protocol to be approved, it must receive the approval of 2/3 majority of those members present at the convened meeting.

2.2 Protocols scheduled for full IACUC review are distributed to all members of the IACUC at least one week prior to the meeting. The IACUC usually meets once per month with additional meetings to address extenuating circumstances convened when necessary.

2.3 The IACUC chair, or his/her designee, assigns one or two members and an attending veterinarian to serve as reviewers (not to be confused with designated reviewer). The reviewers present their finding to other members of the committee at a properly convened IACUC meeting for discussion.

2.4 When it is determined that consultants or experts will be required to advise the IACUC in its review of a protocol, the protocol shall also be distributed to the consultants or experts prior to the meeting, and if necessary the consultant may be invited to the Full Committee Meeting. Consultants may not approve or withhold approval of an activity or vote with the IACUC.

2.5 No member may participate in the IACUC review or approval of a protocol in which the member has a conflicting interest (e.g., is personally involved in the project) except to provide information requested by the IACUC; nor may a member who has a conflicting interest contribute to the constitution of a quorum. At the beginning of each meeting the Chair of the IACUC reminds investigators to declare any conflicting interest not previously disclosed.
3.0 IACUC Actions Following Full Committee Review:
   3.1 Following review of the protocol, a motion is made and a vote taken to either: 1) approve, 2) require modification to secure approval, or 3) withhold approval. In cases where the submission is severely lacking in sufficient detail to make this determination, the Committee can vote to decline to complete review and delay IACUC action/determination.
   3.2 If the motion is to require modifications (to secure approval), a second motion must be made to determine how those modifications will be reviewed: 1) Designated Member Reviewer(s) Assigned (DMRA) or 2) FCR. When the motion is to review modifications by DMRA, the vote must be unanimous. Reviewer(s) are then assigned by the IACUC Chair. At any time prior to or during the full committee meeting any member can request FCR of the revised protocol or request to see the revised protocol when it is sent to the assigned reviewer(s). Providing no one requests FCR, the assigned reviewer(s) is/are authorized to approve or require further modification to secure approval and their decisions must be unanimous.

4.0 Administrative Veterinary Verification Consultation (AVVC)
   4.1 Significant changes defined in National Institutes of Health, Office of Extramural Research, Office of Laboratory Animal Welfare, Notice NOT-OD-14-126, August 26, 2014 (2.a.-c.) may qualify for review by AVVC providing review/verification/consultation will be conducted by a Participating Veterinarian (PV) as delineated in our OLAW Assurance who has species training and experience and understands IACUC policies.
   A. Review/verification/consultation will:
      1) Ensure the requested change is eligible for AVVC as outlined in the National Institutes of Health, Office of Extramural Research, Office of Laboratory Animal Welfare, Notice NOT-OD-14-126, August 26, 2014 (2.a.-c.)
      2) Verify IACUC Policies (defined as guidance documents, policies, formularies or standard operating procedures) reviewed and approved by the IACUC cover the requested significant change
      3) Determine if the requested change is appropriate under the specific circumstances
      4) Recommend modifications if modifications are appropriate and within the scope of the policy
   B. The Participating Veterinarian (PV) is authorized to defer the change to the IACUC for FCR or DMR as necessary
   C. IACUC members will be notified of changes allowed by AVVC and the items will be documented in the protocol file and IACUC Minutes.
   D. To address after-hour emergencies, following consultation with the PV or his/her designee, qualifying changes can be submitted to the IACUC and copied to the PV or his/her designee who is authorized to review and allow the changes. However, the AVVC process for after hour emergencies should indeed be reserved for rare and emergency situations in which immediate review is needed to minimize pain, distress, or discomfort to the animal or to prevent the loss of research animals/data.

5.0 Administrative Handling (AH)
   5.1 External Administrative Acceptance
   A. For projects supported either by a contract, grant or gift awarded to the Regents of the University of Nebraska and administered by UNMC, including money from extramural sponsors, money awarded by the University of Nebraska under a University-managed research program, or any other internal University award appropriated for research support performed in part or total outside UNMC and UNO, the UNMC/UNO IACUC will accept a protocol approved by another PHS Assured IACUC as allowed by the regulatory agencies.
   B. A copy of the protocol and approval from the PHS Assured external site is submitted to the IACUC.
   C. The Executive Chair/Vice Chair acknowledge acceptance of the external approval.
   D. For non-AAALAC accredited institutions, the external site is required to own the animals.
E. These documents will be kept on file along with the results of annual and triennial continuing reviews, notices of adverse events and other information the IACUC would normally maintain about a protocol.

F. No review or approval by the UNMC/UNO IACUC shall be necessary, but notice of acceptance will be noted in the IACUC minutes for documentation purposes.

5.2 Minor Changes:
A. Review of qualifying minor changes can be conducted by the Protocol Assessment Liaison, the Attending Veterinarian/Designee, the IACUC Administrator or a member of the IACUC.

B. Typical changes currently reviewed by AR are changes in title and personnel (other than the change of a Principal Investigator (PI) which requires review by DMR or FCR.)

C. For personnel changes involving USDA covered species, review is usually conducted by the Attending Veterinarian/Designee.

6.0 Notification Following Review:

6.1 Notify investigators and the Institution in writing of its decision to approve or withhold approval of those activities related to the care and use of animals, or of modifications required to secure IACUC approval as set forth in the PHS Policy IV.C.4. The IACUC procedures to notify investigators and the Institution of its decisions regarding protocol review are as follows:

A. The IACUC Chair or his/her designee shall notify the investigator in writing of the IACUC's decision to approve the protocol, require modification in (to secure approval), or withhold approval (disapproval). In order to secure approval the investigator must revise the IACUC application and/or respond to other conditions set by the IACUC.

B. The IACUC Chair or his/her designee shall provide the investigator with the reasons, in writing, for the IACUC's decision to withhold approval of a protocol and shall provide an opportunity for the investigator to respond and appeal.

1) All appeals are required to be in writing.

C. In addition to the written appeal, investigators are provided an opportunity to appear, in person, before a full convened quorum of the IACUC.

D. Applications and proposals that have been approved by the IACUC may be subject to further review by officials of the institution who can overturn an IACUC approval. However, those officials may not approve those sections of an application or proposal related to the care and use of animals if they have not been approved by the IACUC.

E. The IO receives a copy of the IACUC meeting minutes that records all decisions regarding protocol review and activities.