

## **Appendix A: Actions to Reduce Institutional Administrative Requirements Associated with Animal Research**

- Eliminate annual protocol renewals for non-USDA species and non-DOD protocols.
- Discontinue the USDA pain and distress classifications for non-Animal Welfare Act regulated species.
- As the default, implement Designated Member Review rather than Full Committee Review.
- Reduce IACUC requirements for experimental details that are unrelated to the health and safety of animals.
- Adopt NIH OLAW's allowance for "expediting" protocol amendments via a new Veterinary Verification and Consultation (VVC) process, thereby reducing/eliminating full IACUC involvement.
- Expand the scope of administrative approval authority by allowing small changes to protocols to be handled administratively (by IACUC staff or via Veterinary Consultation and Verification process).
- Simplify the IACUC protocol form with standardized language and content requirements and provide template language for importing into protocols. Allow for "procedure libraries" to be selected for protocols. Enhancements to the form could include the following:
  - A standard rodent, pre-approved, pre-operative preparation plan and post-operative recovery plan template.
  - A built-in commonly used drug formulary that will provide the pre-approved dosage, route and frequency of administration.
  - Convert formatted text boxes to simple drop down lists for fast data selection/entry and enhanced reporting capabilities.
  - Drop down list of euthanasia methods/dosages that are pre-approved for a given species
- Replace required documentation on how a proposed protocol was not unnecessarily duplicative with a simple attestation.
- Standardize veterinary review procedures and communications to investigators.
- Review SOPs on a less frequent basis (e.g., every two to three years) based on potential risk (e.g., skill of investigative team, outcomes of PAM reporting).
- Allow investigators to provide an approximate number or range of animals needed over the course of a research project rather than an exact number.

## COGR 2018 Animal Research Survey Report

- Allow investigators to provide a range of time for post-op observation rather than an exact time (e.g., 4-6 hours instead of every 4 hours) to allow flexibility and avoid findings on deviations from the language where actions were appropriate.
- Replace mandatory triennial regulatory refresher seminar with an array of instructional sessions to streamline protocol writing and review. Solicit feedback on how the institution can assist investigators.
- Adopt standardized models for training and documentation.
- Allow use of ad hoc consultants in place of IACUC members (e.g., environmental health and safety or physical plant personnel trained to assess facilities) for semiannual inspections of non-USDA species.
- Eliminate the requirement for a literature search for category D and E procedures for non-USDA species.
- Eliminate the requirement for a literature search for category C procedures for all species.
- Allow investigators the flexibility to include more than one species and funding source per protocol.
- Eliminate the requirement to describe facilities and husbandry in the protocol if a protocol is using central facilities and centralized staff support.
- Do not require a protocol re-write for PHS triennial review if your process allows modifications to be included in the latest version of the protocol rather than as an attachment.