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*Note: Text has been edited for clarity.*

## **The OLAW Annual Report – What You Need to Know**

*Speaker: Eileen Morgan, Director, Division of Assurances, OLAW*

*Moderator: Susan Silk, M.S., Director, Division of Policy and Education, OLAW*

*Broadcast Date: December 10, 2009. A recording of the seminar can be viewed at <https://webmeeting.nih.gov/p66434108/>*

[It takes several minutes for the recording to load]

Slide 1 (The OLAW Annual Report)

Hello everyone and welcome to the OLAW Online IACUC Staff seminar. Today is Thursday, December 10, 2009 [Can you hear me?]. Our seminar will be presented by Eileen Morgan. I am Susan Silk, the Director of the Division of Policy and Education in the [Office of Laboratory Animal Welfare](#) and will be the moderator for today's seminar. Jerry Collins will be joining us electronically from New Haven. We hope to have him with us with us in Bethesda for our next seminar on March 11, 2010 when our topic will be "**Physical Plant Issues.**" In addition to our seminar for IACUC Staff, OLAW also offers a seminar for Institutional Officials. Why don't you encourage your IO to join us

for that seminar? Registration information is available on the OLAW webpage at [olaw.nih.gov](http://olaw.nih.gov).

Today, I am delighted to welcome our colleagues in Peru. They recently registered to participate in our seminars, bringing our total to 388 participating institutions from 48 of the 50 U.S. states, one possession, and four countries.

We record the IACUC Staff Seminars and make the recording available to everyone, on the OLAW website, in the [Education section](#). If you have to miss a seminar or, if another time is more convenient for you, you can listen to the recorded version. We will post today's recording as soon as we are able. We will also post a transcript of the seminar and a PDF version of Eileen's slides. You'll have to wait several weeks for that though, as it takes us some time to prepare the transcript.

We've started a new aspect of this seminar program that I'm very excited about and I want to explain it to you today. When we upload the recorded seminar, the slides, and the transcript, we will provide a place for you to submit questions. The website will collect questions for a period of time, then we will close that portion of the site and prepare the answers to your questions. This question document will also be uploaded to the OLAW website. So even if you watch the recorded version of the seminar, there will be a way for you to ask questions about the seminar. Your active participation really enriches this seminar and we appreciate your questions. Throughout the seminar, if you have a question for our speaker, we encourage you to type the question in the "submit a question" box in the upper left corner of your

screen. Only OLAW staff will see what you have written. We will address as many questions as we are able in the time available.

Now I would like to introduce Eileen Morgan. Ms. Morgan serves as the Director, Division of Assurances in the Office of Laboratory Animal Welfare. She previously served as a Senior Assurance Officer in the Division of Assurances. Eileen holds a B.S. in Technology Management from the University of Maryland with a minor in Animal Health Technology. She has 25 years of experience in animal models-based biomedical research. Her experience includes service as the Chief of the Facility Management Branch in the Division of Veterinary Resources, which is a part of the NIH Intramural Program. She has also held positions at the Johns Hopkins University School of Medicine, the American Red Cross Holland Laboratory, Affinity Biotech, and the Cleveland Research Institute.

As you've already deduced, we're having a little bit of sound difficulty, already, with this seminar. So Eileen will be logged on as Pat. Pat Brown's computer is working properly – so Eileen, under the name of Pat Brown, will begin her presentation on: **“The OLAW Annual Report – What You Need to Know”**.

Good afternoon. I'd like to talk with you today about the OLAW Annual Report Requirement as described in the [PHS Policy](#). My talk will cover the components that are required in your [Annual Report](#). I will also talk about the process of submitting your Annual Report to OLAW.

Slide 2 (PHS Policy Reporting Requirements)

[PHS Assured domestic institutions](#), those in the U.S., with a brick and mortar animal facility and an animal care and use program, with an IO and an IACUC are required to file a report to OLAW once every 12 months. The report is filed by the IACUC through the Institutional Official or IO. This requirement is described in the PHS Policy [Part IV.F.](#)

Slide 3 (PHS Policy Reporting Requirements (Part IV.F.))

This slide shows the formal language of the PHS Policy. It says that at least once every 12 months, the institution will provide OLAW with a written report of any program or facility change which would result in a different category than what is specified in the [Animal Welfare Assurance](#) for the institutional status of the institution's animal care and use program's accreditation by the Association for the Assessment and Accreditation of Laboratory Animal Care, International (AAALAC). Any change in the animal care and use program as described in the institution's Animal Welfare Assurance.

Slide 4 (PHS Policy Reporting Requirements (Part IV.F.))

Or any change to the IACUC membership. Provide the dates that the institution performed the [semiannual program review](#), and the dates that the institution performed the [semiannual facility inspection](#).

Slide 5 (PHS Policy Reporting Requirements (Part IV.F.))

If there are no changes to the institutional animal care and use program, the institution is required to report to OLAW, in writing, that there were no changes and provide the dates that the semiannual program review and facility inspection evaluations were performed.

#### Slide 6 (What to Report)

What to report. If an institution, is listed as Category 1, which is AAALAC accredited, and they add a covered component to their Assurance, which has not yet been accredited by AAALAC, this would result in the institution changing its status to Category 2 – until such time that the new covered component achieves AAALAC accreditation. The result of the change to Category 2 affects the renewal Assurance process. When it's time to renew the Assurance, the institution must provide a copy of the last [semiannual report to the Institutional Official](#) of the program and facility review. They must provide that document to OLAW along with their renewal Assurance documents.

The reverse also occurs. A Category 2 institution achieves AAALAC accreditation. Then the Annual Report would include that information and the institution's status would change to a Category 1. And the semiannual reports would no longer be required with the Assurance renewal submission.

#### Slide 7 (What to Report)

Here is the list of the type of program changes that should be reported. [If the program] has changes, check the box for "program changes" on the Annual Report form and attach a separate piece of paper summarizing the changes. There is no need to submit a revised Assurance document for every program change, but rather [submit] a summary of the change. We will retain your changes with the Annual Report. OLAW will determine if a revised Assurance document needs to be submitted based on the changes to your animal program, as described in your Annual Report updates. This review, as to whether or

not you need to submit a revised Assurance document, is done on a case-by-case basis.

#### Slide 8 (What to Report)

For changes to the Institutional Official or the IACUC Chair, please provide all the contact information to include the mailing address, the telephone number, the fax number, and particularly the e-mail address. We need an e-mail address for both the IO and the Chair, as much of our communication with institutions is electronic.

#### Slide 9 (What to Report)

Here is the continued list of types of program and facility changes that should be included in the Annual Report:

- Change in the veterinarian
- Change in the veterinarian's authority or responsibility
- Modifications to the occupational health or training programs
- Changes in buildings, species, or approximate number of animals housed.

#### Slide 10 (What to Report)

In addition to program changes, the required items to be included in the Annual Report are:

- The dates the IACUC conducted its semiannual program evaluations and facility inspections
- Any minority reports with the semiannual program reviews or facility inspections
- Or any minority reports regarding any recommendations made to the Institutional Official concerning any aspect of the institution's animal program, facilities or personnel training as described in the PHS Policy, [Part IV.E](#). Recordkeeping

Requirements and [Part IV.B.5](#). Functions of the IACUC,  
Recommendations to the Institutional Official

- and any changes to the IACUC membership.

#### Slide 11 (What to Report)

The semiannual annual program review and facility inspections are required to be performed at least once every six months to provide consistent oversight of the animal care and use program. That is, looking over the component parts of the program at least once every six months. The date should correlate to the calendar year in which you are reporting them. Examples would be: January and July, or February and August. These would be approximately six months apart.

When the Annual Report is reviewed, OLAW personnel look at the previous Annual Report date provided for the prior year and verify that the last date of the review and inspection in 2008, for example, was performed six months prior to the first date provided for 2009. So we're looking for a consistency across the years. If the dates provided are greater than seven months apart, then we send a letter to the Chair to remind the institution to perform their semiannual program reviews and inspections at least once every six months.

If the institution repeats the semiannuals being performed greater than seven months apart the following year, we forward the report to the Division of Compliance Oversight - as the institution is not in compliance with the PHS Policy - which requires that the semiannuals be performed at least once every six months.

#### Slide 12 (What to Report)

Any minority views submitted by members of the IACUC regarding reports filed under [Part IV.F.](#) of the PHS Policy for this reporting cycle must be attached to the Annual Report.

This statement from the Annual Report comes from the PHS Policy and refers to the requirement that any minority views filed by members of the IACUC must be submitted with the Annual Report document to OLAW. This includes minority views included in the records of semiannual IACUC reports as well as any minority reports in recommendations to the IO regarding any aspect of the institution's animal program, facilities, or personnel training.

#### Slide 13 (What to Report)

The items on the IACUC membership roster that most often require revisions are - the position title column, that's the third column. It should list what the individual's title is at the institution. Only in the case of the non-affiliated member it should provide a general description such as lawyer, ethicist, clergy, retired police, or fire.

PHS Policy membership requirements is the fourth column - that column should identify what position the individual fulfills on the committee, such as veterinarian, scientist, non-affiliated member, or non-scientist.

Another item that - most often requires revision - is providing information **not** required on the roster, such as, complete names, addresses, home, or office telephone numbers. From the Annual Report the statement is listed - names of the members, other than the chair and the veterinarian, may be represented by a number or symbol in the Annual Report. Additionally, nonvoting members must be so identified.

#### Slide 14 (Reporting Periods)

OLAW recommends calendar reporting January 1 through December 31<sup>st</sup>. That's the reporting period to ensure compliance with the reporting requirements of the [PHS Policy Part IV.F](#). For calendar year reporting for the year 2009, the annual report is due to OLAW by January 31<sup>st</sup> 2010.

#### Slide 15 (Annual Report Format)

I would also encourage that each institution use the [sample Annual Report](#) format provided on the OLAW website. The sample was updated in December of 2008. OLAW requires the Annual Report to be signed and dated by the Institutional Official and the IACUC Chair.

#### Slide 16 (Completing the Annual Report)

To complete the Annual Report using the sample, you may download the [sample Annual Report form](#), save it, and complete the document. Then print the form and submit it via fax or e-mail.

Slide 17 (Submitting the Annual Report)

The preferred method of submission is by fax. The fax number is **301-915-9478** and is listed on the slide. You may e-mail the document, once the Annual Report has been signed and converted to a PDF, to [olawarp@mail.nih.gov](mailto:olawarp@mail.nih.gov). That's also listed on the slide. Upon receipt, the Annual Reports are logged into the database as received and then the document is reviewed by personnel in the Division of Assurances. If there are program changes, these must be reviewed by an Assurance Officer or myself for appropriateness with the [PHS Policy](#) and with the provisions of the [Guide](#). If there are questions, the Chair will be contacted for clarification or updates. Once reviewed and accepted, the institution will receive a letter of acceptance. A copy is maintained in the Assurance file.

Slide 18 (OLAW Web)

This slide shows the OLAW e-mail boxes for OLAW ([olaw@od.nih.gov](mailto:olaw@od.nih.gov)) and the three divisions, the Division of Assurances ([olawdoa@mail.nih.gov](mailto:olawdoa@mail.nih.gov)), the Division of Compliance Oversight ([olawdoc@mail.nih.gov](mailto:olawdoc@mail.nih.gov)), and the Division of Policy and Education ([olawdpe@mail.nih.gov](mailto:olawdpe@mail.nih.gov)).

Slide 19

So, if you have sent questions to the OLAW question box we'll try to answer those now.

Slide 20 & 21 (2010 - 11 Staff Online Seminars)

Before we begin to answer your questions, I'd like to give you a preview of the schedule we are developing for 2010 and 2011, you can

see that posted here on your screen. Here's 2010, and here's 2011. I think we're having a technical problem...

...So, now, we'll go to the questions. **Eileen, does the institution have to submit an Annual Report if they have recently renewed their Animal Welfare Assurance?** Yes, an Annual Report is required to be submitted to OLAW at least once every twelve months, regardless of when the Animal Welfare Assurance was last approved. The Assurance renewal has no bearing on the Annual Report. The Annual Report and the Assurance documents are separate requirements to OLAW.

**If there are programmatic changes after the Annual Report has been submitted to OLAW, how should the institution report these?** If the program changes occur in the new calendar year and they are not a change in the IO or a change in the Chair, they can be submitted to OLAW in the following year with the Annual Report. If the change is to the IO or the Chair, we would request that this information be provided to OLAW when the change occurs – along with pertinent contact information including the mailing address, the telephone number, the fax number, and the e-mail address and - I'll repeat - we need the e-mail address for the IO and the Chair – as much of our communication with institutions is electronic.

**For the semiannual program review and facility inspections, does the institution have to list all of the facilities and the dates they were inspected?** If the semiannual inspection is performed over the six-month period, the institution can provide us with a list of the

dates of the reviews and the inspections. They should keep in mind, however, that the same areas should be inspected and reviewed on a six-month schedule so the program oversight is consistent.

**What happens if the semiannual dates are more than six months apart?** OLAW will review the Annual Report and if it is noted that the semiannual dates are greater than seven months apart, the institutions will receive a letter accepting the Annual Report but noting that the semiannual reviews were greater than seven months. This is not in compliance with the PHS Policy. We will request the institution to align their semiannual program and facility inspections to be every six months to ensure consistent oversight of the animal program. If this repeats for a second year, the Annual Report will be submitted to the Division of Compliance Oversight for follow up as noncompliance.

**Why not submit the Annual Report prior to December 31<sup>st</sup>?** Prior to December 31<sup>st</sup>, the institution has not completed the Annual Report period. You don't have all the information for program changes in your animal care and use program. For example, you finish your second semiannual report on October 31<sup>st</sup> and decide to submit your calendar year report to OLAW on November 1<sup>st</sup>. You are reporting for a twelve-month period but you've only completed ten months of that period. Rather, you should wait until the end of the reporting period, December 31<sup>st</sup>. Then compile the [Annual] Report and submit it to OLAW prior to January 31<sup>st</sup>.

**What if the Annual Report is submitted late?** The Annual Report is due to OLAW by January 31<sup>st</sup>. On - or about- February 28<sup>th</sup> OLAW will

determine which institutions have not complied with the PHS Policy and send reminder notices. Not submitting the report is considered noncompliance with the PHS Policy reporting requirements.

**What is considered noncompliance regarding the Annual Report?** Providing no information regarding the semiannual program review and facility inspection dates is one example, or performing the reviews in a time span that is greater than seven months apart would constitute noncompliance with the PHS Policy. Some other examples include: a minority report submitted which outlines a concern, which is clearly a reportable incident. Another is changes that were made to the IACUC which result in a noncompliant make-up of the Committee. Program changes which were made - such as protocol review was improved – but – however, the program change was not compliant with the PHS Policy.

**When is the Annual Report accepted by OLAW?** The majority of the approximate one thousand Assured institutions submit Annual Reports by January 31<sup>st</sup> on calendar year schedule. Calendar year reporting is recommended to ensure that all Annual Reports are submitted to OLAW as required by the PHS Policy. Any of those submitted with program changes or an updated IACUC roster are reviewed by OLAW. If there is missing information, or problems with the new program policy described, dates provided greater than seven months between semis or an incomplete IACUC roster, revisions **must be submitted by the institution prior to the Annual Report being accepted**. Once the document has been reviewed and has been

correctly submitted, the acceptance letter will be sent to the IACUC Chair of the institution.

**What if the IO is not available to sign the Report?** The IO may assign another individual as having signature authority. That person is authorized to sign for the IO. However, OLAW must have a copy of a letter or memo on file, stating that signature authority has been assigned to another named individual and the document must be signed by the IO.

**What if the Chair is not available to sign the report?** A Vice Chair may also sign in place of the IACUC Chair.

**If a new facility is added, and it's not AAALAC accredited, does that change the status of the institution from category one to category two?** If not all components of the animal program are not yet AAALAC accredited, the category would change from a one to a two.

**Should changes with the Assurance be reported with the Annual or as they occur?** Generally changes that occur in your animal care and use program across the year should be reported to OLAW with the Annual Report. However, there are some exceptions and I named that earlier. If the IO or the Chair change, then we would appreciate hearing that as soon as it occurs due to the fact that changes might occur across the year and we may need to communicate with your institution and we would like to contact the appropriate people.

**Can you please clarify the species change notification requirement? What kind of changes are we talking about?**

If an institution has a new facility go online and, for example, they were formerly a mouse and rat facility and now they've added a large, multispecies building and they're adding a large number of animals in addition to that, large species, something other than the mouse and rat species, then it would be important for the institution to let us know in a memo-type format and we would add that to their Assurance file.

**Our IACUC has created a policy to use designated member review subsequent to full committee review in our IACUC review process. Should we report this as a program change with our Annual Report?** Yes, this is the type of program change that should be included in the Annual Report to OLAW.

I said earlier that you were an enthusiastic group, and you are. Lots of questions are flying in and we're so pleased to see them. **In the Annual Report, should Interinstitutional Agreements, approved by OLAW, be included?** There's no requirement for Interinstitutional Agreements to be included in the Annual Report. OLAW already has a copy of the Interinstitutional Agreements because we sign them.

**[Question missing]** No, we would not consider your program becoming a category two because of a new building. Because, remember, AAALAC is also a program and site visit review, so they're really approving your animal care and use program. And that wouldn't

imply that just because you have a new building, you change categories.

**If our Assurance has substantially changed, but is not due for renewal for two years, would OLAW prefer to receive the changes via the Annual update or a completely new Assurance?**

Generally, we would prefer to receive a summary of the changes, attached to your Annual Report. You would check the box on the front of the Annual Report form that says [unintelligible] change and then include those. When you submit the [Annual] Report to OLAW, it will be reviewed by myself or an Assurance Officer and we will make the determination based on the depth of the program changes whether or not we need to receive a revised Assurance document. But it's not necessary to submit a revised document with your Annual Report, unless you are asked for one.

**Do the minority reports need to be explained in the Report, or just report the dates?** The minority report, itself, needs to be provided to OLAW so there would be some minutes of the minority report in your IACUC records and those need to be submitted with your Annual Report.

Eileen, this is a long question. It's a multi part question, so I'm going to read it to you in parts. Here's the first part. **It is my understanding that if an institution has undergone an AAALAC site visit during the year - that it would suffice for the Annual Report. Is this correct?** No. An AAALAC site visit is not an Annual Report. You might be referring to the fact that if you had an AAALAC

site visit, it could serve as your semiannual facility inspection. That's different than the Annual Report.

**And then the next part of this - the questioner asks if this is correct - Do I need to submit anything other than the reaccreditation confirmation? And I believe Eileen has said "No!" [An AAALAC site visit will not suffice for an Annual Report.]** The next part of the question says, **"We are also undergoing our PHS Assurance evaluation, which should include how we conduct business, and our current IACUC members, would it suffice to fulfill the Annual Report?"** This question is not entirely clear to me. **Would you like to restate it for the audience?** I'm first going to go back to the line before this one – referring to the AAALAC site visit [that] says, "Do I need to submit anything other than the reaccreditation confirmation?" What you would submit would be your AAALAC site visit for the date of one of your two semiannual facility inspections. So that's that question. The second one is **"If we are undergoing PHS Assurance evaluation, would the renewal Assurance document complete the requirements of the Annual Report?"** And the answer to that is "No." The Annual Report and the Assurance document are separate stand-alone documents. Even though your Animal Welfare Assurance has recently been renewed by OLAW, you're still required to submit an Annual Report. The only place that OLAW collects the dates of your semiannual program and facility inspections is in the Annual Report.

Here are two easy questions. I'm going to combine them and I'm going to answer them myself. **Are there handouts? Will the slides**

**from this webinar be available on the OLAW website?** Yes. And we'll be posting those in the Education Section of the OLAW website, but you'll have to give us several days to prepare those. You can look for them in a week or two. The recording will go up sooner.

So now we'll go back to questions for Eileen. **[Question missing]** The Annual Reports are not posted online. They would be available under FOIA [Freedom of Information Act] requirements if an institution – if they were requested. Susan, could you repeat that question, please? I don't think all of the listeners had a chance to hear it. Thank you, Jerry. **Are copies of the Annual Report posted online or available via FOIA?** Jerry, did the audience hear Eileen's answer to the question? I believe so; I certainly heard it a couple hundred miles away. Ha ha. You're our offsite reporter. Thank you.

**Can you clarify the requirements for IACUC members' addresses, phone numbers, et cetera? Do those need to be reported if it is not the address and phone number for the IO or the Chair?** That's correct. You do not need to provide contact information for the IACUC members other than the veterinarian – we need the name of the veterinarian. And for the Chair - we need the name of the Chair and all contact information, including the address, phone, fax, and e-mail address. The same for the IO - when they sign the Assurance document - we need their address, phone number, fax number, as well as their e-mail address.

**Eileen, is fax submission preferable to e-mail submission?**

That's an overwhelming **YES!** Fax submission to the number provided [301-915-9478]– fax submission is far preferable for the Annual Report and the reason for that is – our fax system converts the Annual Report into a PDF document and we are able to move it into your record – your electronic record of your Assurance file – more efficiently than if you submit an e-mail.

**Do minority views of nonvoting members of the IACUC need to be documented?** Minority views for nonvoting members do not need to be documented.

**Also, this is a second part of this question. Do nonvoting IACUC members need to sign the semiannual report?** The voting members of the IACUC are the ones that would sign the semiannual report.

**Does OLAW make noncompliances available via FOIA?** Incidents of noncompliance are filed with the Division of Compliance Oversight and when a review is completed and the noncompliance incident has been finalized – then those items are available under FOIA. If an item is under review – then that is not FOIAble.

For more information about the Federal regulation, FOIA, please look on our website, in our [Frequently Asked Questions](#), we have additional information about the FOIA. Since the money that we grant, or provide as contracts, through the NIH, is Federal money, that material is available to the public under the Federal law – FOIA. We also – on our [website](#) – have one of these [recorded Online Seminars that was on the](#)

[topic of FOIA](#). That's available – you can listen to it. The speaker is Susan Cornell who is an attorney and the NIH FOIA Officer.

So now moving on to other questions, someone wants to know – **What is the criteria for the difference between a category 1 and a category 2 institution?** This questioner is referring to AAALAC categories. The criteria is: a category 1 is AAALAC accredited and a category 2 is not. And I believe I stated earlier, there are different requirements in the Assurance process. So if you are submitting an Assurance document for the first time or a renewal Assurance document, if you are category 2, not AAALAC accredited, you must submit your semiannual program and facility reviews, along with your Assurance renewal document.

**Does OLAW view category 1 and category 2 institutions [differently]?** There's really no difference except that we would require that you submit your semiannuals when you're submitting your renewal Assurance documents. Category 1 institutions are certainly noted as being AAALAC accredited and having additional oversight and review.

**If the AAALAC site visit doesn't coincide or work with your semiannual inspection date, will it still be acceptable as one of our site inspections?** The reviews for your semiannual program and facility inspections still need to be in approximately six months of each other. So if the AAALAC site visit is out of that cycle, then you'll need to do another review six months from that AAALAC program review and site visit.

We have a question here – **If a unit is on probation, are they still considered a category one institution?** It's my understanding that the information from AAALAC is [not] provided to the public unless an institution is either accredited or is not accredited by AAALAC. Otherwise, the information is between the institution and AAALAC - so we would not be aware of it [probationary status].

This question has been cut off by the computer, but I am going to do my best with it. **If we are not required to list IACUC member names, how does OLAW track the IACUC members?** I'm not sure what you mean by track, but we verify that the appropriate roles are being held by the appropriate person. If you complete columns three and four, you've given us the background and the position title of the individuals named as members and you've also given us their PHS requirement role, whether that be a veterinarian, scientists, non scientist, or non affiliated. And we will certainly ask questions when we are reviewing the IACUC roster as part of the Annual Report or as part of the Assurance renewal process regarding the correct membership to have a properly constituted Committee.

Eileen, if we could go back for a moment to a previous question, it was the question about using the AAALAC site visit if the site visit happened in the middle of the six-month sequence. And if I heard your answer correctly, it sounded as if people used that, then they would have to have an inspection again within about six months. Could you, perhaps, clarify that so that folks understand that if they are changing

to a new cycle, they need to better understand that's happening. They can't be switching back and forth between one cycle and another. Maybe I can give an example. So if you were on a January – July cycle, for example, you did a January semiannual program and facility review, but AAALAC came in April. So you would be more or less changing your cycle so your second semi would be in April. But OLAW would still require that you do another site visit within the six months – and there's a little bit of wiggle room – up to seven months. So somewhere six months from April, you should be looking to perform another semiannual. And your cycle would change then to April and six months from April – September. Is that clear, Jerry? That certainly is. Thank you.

**Eileen, what's the earliest date that Reports can be submitted?**

We would prefer that you submit your Annual Report after December 31<sup>st</sup>. As I stated earlier, if you submit an Annual Report prior to the [end of the] reporting period, you really could have program changes occur and you're sending in a Report - for example, if you submit it in December first - you're submitting an Annual Report for a twelve month period when you've only covered eleven months of that period.

That brings us to the end of the questions that you have submitted. Oh wait. One more has come. But I don't know where it is, so maybe Eileen would read that to you? Yes, we have come to the end of the questions. We're really grateful to you for taking the time to listen to this and to submit your questions. It's not easy being a pioneer, and as we struggle with this technology, we believe that we can continue to improve. We believe that this chance to interact with you is valuable

– it does save you the expense and the time of traveling - so keep working with us and we will get this right. In the meanwhile, though, we've decided that we will prepare transcripts and we will fill in the missing information. We'll be able to provide live links; we've done that with other seminars. So give us a couple of weeks, we will get that transcript up on the Web.

Someone is writing here that they had a question that was missed. Here it is: **For semiannual program report, do correction plans for minor deficiencies** – and then we don't have the rest of the question. So, Eileen, **can you speak, a little bit, about the program report correction plans for minor deficiencies, please?** For the semiannual facility inspections, each deficiency noted should be designated as minor or significant. And there should be a plan and schedule with a correction date for each item. On the OLAW website under Sample Documents under [Facility and Program Review](#), there is a form which would be a good sample to use to complete your semiannual. So for both minor and significant deficiencies, there is a requirement to complete a plan and schedule for correction. And the form lists columns for each one of these things and you can easily put in the plan and then have a date for correction and even a follow-up.

OK, I'm just going to allow a few more seconds, in case we've missed anybody or misunderstood. Please go ahead and type that in. And while we're waiting for that information, I'll just say that we're glad that we've been able to spend this time with you and we look forward to seeing you again in March. So everyone, please have a happy holiday, whatever holidays you celebrate. And I think I'll turn this over

to Pat Brown, who is logged in as Eileen Morgan. No she's not. Um – we do have another question and I don't want to leave that person out.

OK, I do have that question, Susan, if you'll give me a chance to read it. Just two seconds, here. **Is it allowable for Veterans Administration Medical Center Facilities to submit [Annual] Reports based on October 1 to September 30<sup>th</sup> dates instead of on a calendar year reporting schedule?** We currently accept non calendar year reporting. There are a few institutions that have established that in their Animal Welfare Assurance or in writing to OLAW and have requested something other than the calendar year. But, we would highly recommend you use calendar year because it's more effective in managing the Annual Report process for a thousand institutions.

There's another question. **What protects IACUC members from being contact targets by animal activist organizations?** Well, as I noted earlier, the information on the IACUC roster does not require that you submit names of your IACUC members. The only information that we must receive is the name of the veterinarian and the name of the IACUC Chair.

Here's a part of a question coming in and maybe between us, Pat and Eileen, we can figure out what the questioner asks. The question says, **Need to be indicated or only significant?** Would that be clear to you what that person is asking? No, they're not understanding the question. We're sorry.

Susan, I think that was actually – Jerry – I think that was the end of a previous question about correction plans for minor deficiencies. So that was the last part of that question. So was that the one regarding whether or not they needed to provide corrections for minor AND significant deficiencies? And I think I answered it, if that's the case. I believe so. The question basically read, **For semiannual program report, do corrections plans for minor deficiencies need to be indicated or only for significant deficiencies?** My answer was clear that it's for both.

That appears to be the end of the questions and here's a really nice comment. I'm going to end with this comment and I thank you for it. This participant says, **This is not a question, but a thank you for all these online interactions.** And we thank you. Good-bye and we'll see you in March [2010].