#### Pandemic Contingency Planning and Its Impact on Animal Care

Patricia Brown, NIH, OLAW

Robert Gibbens, USDA, APHIS, Animal Care

#### **Resources – Handouts**

- OLAW Guide Notice NOT-OD-20-088 on Flexibilities for IACUCs
- OLAW Guide Notice NOT-OD-06-052 on Use of Telecommunications
- OLAW FAQ G9 on Pandemic Preparation
- NIH Intramural Program 2008 Pandemic Flu Plan
- NIH Division of Veterinary Resources Continuity of Services Plans
- Johns Hopkins University Animal Research Coronavirus Phased Contingency Plan

## Coronavirus Disease 2019 (COVID-19)



- A respiratory illness that can spread from person to person
- A novel coronavirus first identified during an investigation into an outbreak in Wuhan, China
- A global infectious disease with ongoing spread

#### Helpful Links https://medlineplus.gov/coronavirusinfections.html

NIH) U.S. National Library of Medicine

MedinePlus			Search MedlinePlus			GO
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Home → Coronavirus Disease 2019 (COVID-19)

#### Coronavirus Disease 2019 (COVID-19)

Stay up to date with the latest information from the Centers for Disease Control and Prevention and the National Institutes of Health.







#### **Helpful Links**

#### https://www.cdc.gov/coronavirus/2019-ncov/index.html



Centers for Disease Control and Prevention CDC 24/7: Saving Lives, Protecting People™

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Coronavirus •

All A-Z Topics

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The President's Coronavirus Guidelines for America -- 15 Days to Slow the Spread of Coronavirus (COVID-19) More at Whitehouse.gov.

#### Coronavirus (COVID-19)

How to Protect Yourself (>)

If You Think You Are Sick (>)

#### What You Need to Know



Symptoms



Older Adults & Medical Conditions



**Prepare Your Family** 



#### Helpful Links

#### https://www.nih.gov/health-information/coronavirus



National Institutes of Health Turning Discovery Into Health

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Health Information	Grants & Funding	News & Events	Research & Training	Institutes at NIH	About NIH
COVID-19 is an em	erging, rapidly evo	olving situation.			
	rmation from CDC: https://www.c ion from NIH: https://www.nih.g				
Coronavirus (	COVID-19)				
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Resources from NIH			News Releases from NIH		

- Structural Biology Points Way to Coronavirus Vaccine (NIH Director's Blog)
- Information for NIH Applicants and Recipients (Grants & Funding)
- Coronaviruses (National Institute of Allergy and Infectious Diseases)
- Coronavirus resources (National Library of Medicine)
- · Coronavirus news and resources for global health researchers (Fogarty International Center)
- · In the News: Coronavirus and "Alternative" Treatments (National Center for Complementary and Integrative Health)
- NIH Guidance on Travel and Meetings

- New coronavirus stable for hours on surfaces (National Institute of Allergy and Infectious Diseases)
- NIH clinical trial of investigational vaccine for COVID-19 begins (National Institute of Allergy and Infectious Diseases)
- NIH clinical trial of remdesivir to treat COVID-19 begins (National Institute of Allergy and Infectious Diseases)

#### Coronavirus Disease 2019 (COVID-19) Outbreak

#### Helpful Links https://www.who.int/emergencies/diseases/novelcoronavirus-2019







Home / Emergencies / Diseases / Coronavirus disease 2019

#### Coronavirus disease (COVID-19) outbreak

Protect yourself Country & technical guidance		COVID-19 Response Fund	
Latest updates		Your questions answered	
	press briefing on COVID-19 - 16MARCH20 Swatch later Share	Travel advice	
		Situation reports	

#### **Poll Questions**

# OLAW Guidance on Flexibilities for IACUCs – NOT-OD-20-088

- https://grants.nih.gov/grants/guide/noticefiles/NOT-OD-20-088.html
- Conduct of semiannual facility inspections
- Waivers to IACUC functions
- Conduct of IACUC meetings

#### Conduct of Semiannual Inspections



- Timing of inspections may extend 30 days beyond the six-month interval from the last review as long as no forward drift from year to year
- Any qualified individual can serve as an ad hoc consultant to conduct inspections
- For areas with non-USDA regulated species, the IACUC may use as few as one qualified individual to conduct the inspections



#### Waiver of IACUC Functions

- OLAW may waive specific IACUC functions in accordance with PHS Policy Section V.D.
- If unable to inspect all of the animal facilities (including satellite facilities) may request a waiver
- Authorized institutional representatives (IO, IACUC Chair, IACUC Coordinator or Veterinarian) may request a waiver

#### Waiver of Functions, cont.

If IACUC is unable to:

- conduct program review
- prepare reports to IO
- review concerns involving care and use of animals
- make recommendations to IO
- review animal activities or significant changes to ongoing activities
- suspend an activity





#### How to Request a Waiver

- Submit request for the IACUC function(s) to be waived
- Include a justification for each of the requested functions
- Request can be in email or attached letter sent from authorized representative
- Send to OLAW at olawdpe@mail.nih.gov

OLAW will review and approve the request in writing and respond by return email

USDA



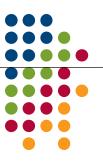
## **APHIS, Animal Care**



#### COVID-19

- Facility Status and Inspections
  - Regulatory Requirements with Deadlines
  - Contacting AC





### Facility Status and Inspections

- Facility is closed, or has a sick employee, or does not believe it is safe for an inspection to occur due to COVID-19 concerns
- Facility does not believe it is safe for portions of the facility to be inspected due to COVID-19 concerns
- VMO has concerns about safety of inspecting the facility or portions of the facility



#### **Regulatory Requirements with Deadlines**

- Semiannuals, annual protocol review, etc.
- VMOs will be giving latitude
  How much?



#### **Contacting AC**

- AnimalCare@usda.gov
- Fort Collins: 970-494-7478
- Riverdale: 301-851-3751
- VMO or Supervisor
- Bob Gibbens: 970-494-7474

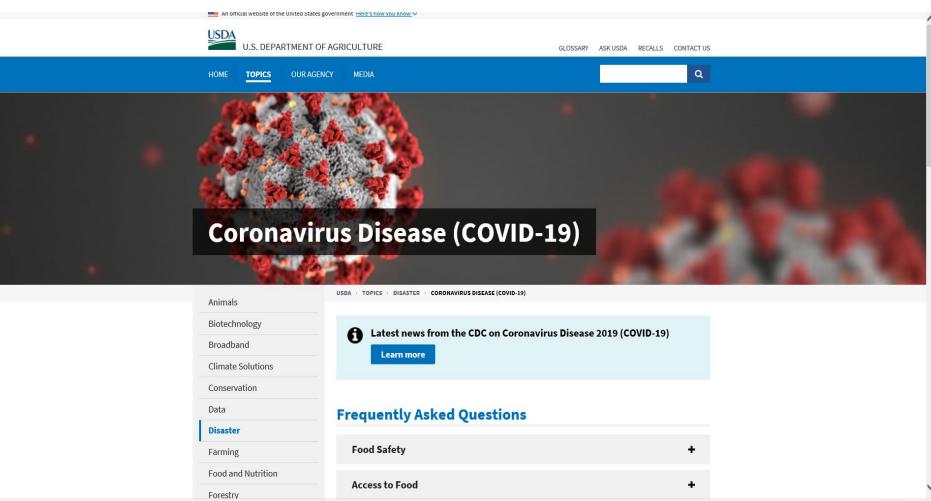
Robert.m.gibbens@usda.gov

• Aaron Rhyner: 970-494-7484

Aaron.a.rhyner@usda.gov <sup>18</sup>

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#### USDA COVID-19 Landing Page https://www.usda.gov/coronavirus



#### Guidance on Pandemic Planning



- Frequently Asked Question G9
- How can institutions and their IACUCs best prepare for a pandemic?
- Updated March 2020
- https://olaw.nih.gov/guidance/faqs#687

## **Key Issues**



- Advance planning
- Protect the health and wellbeing of animals
- Prepare for limited personnel to care for the animals
- Plan to conduct IACUC official business



## Key Issues – Animal Facilities

- Appropriate staffing levels
- Cross-training to cover critical operations
- Adequate inventories of essential supplies
  - > Feed
  - > Bedding
  - > Personal protective equipment
  - Cage wash supplies

#### Key Issues – IACUCs

Plan for conducting official business:

- The IACUC must continue to be properly constituted
- A quorum is required to conduct official business at a convened meeting
- The IACUC must ensure that protocol approvals are not allowed to expire or if they do expire, that no further animal activities (e.g., data collection) are conducted
- Appointment and training of IACUC members (including nonscientific members and alternates) should be considered as a part of the plan



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#### Key Issues – IACUCs, cont.

Consider options provided in the PHS Policy:

- Social distancing to reduce contact
- Alternatives to face-to-face meetings:
  - > Teleconference and videoconference
  - > See NIH Guide Notice NOT-OD-06-052
- Number of IACUC meetings reduced to one every six months.
- Expand use of designated member review 24 https://grants.nih.gov/grants/guide/notice-files/NOT-OD-06-052.html





#### **Additional Guidance**

If severe and long lasting situation develops

- Guidance posted on the OLAW website
- Assist with needs of research community
- Address the needs of funding components
- OLAW may consider additional waivers to PHS Policy

#### **Helpful Links**

https://www.aalas.org/iacuc/iacuc\_resources/ disaster-preparedness

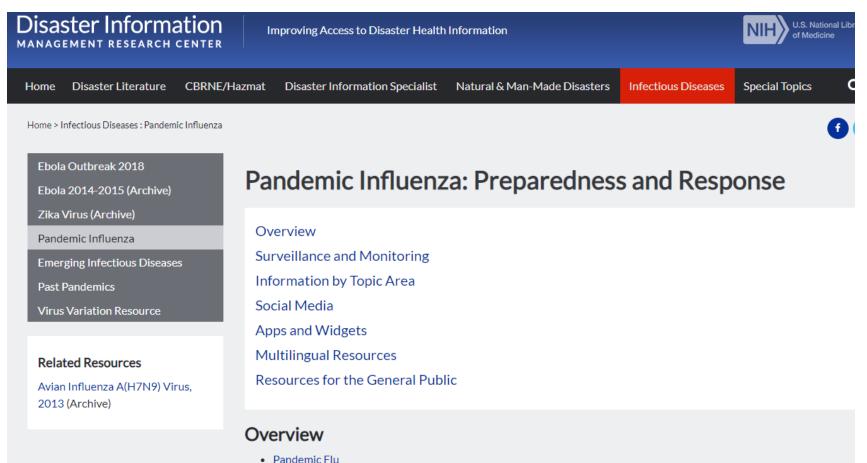


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Membership Education	Certification	Publications	National Meeting	Public Outreach		
Laws, Policies, and Guidelines	Home : IACUC :	Home : IACUC : IACUC Resources : Disaster Preparedness				
Associations and Councils	Institutio	nal Plans				
Universities	Drake Univer	isty (PDF)				
Corporations	Michigan State	Michigan State University, Sample policy on Conducting IACUC Business in the				
International Government	International Government Event of a Pandemic 🗐					
US Government		Mississippi State University, (PDF) Policy and Procedure Statement on Crisis Management Plan for (Biomedical) Animal Care and Use				
Agencies, Institutes, and Associations	Oregon State	Oregon State University, (PDF) Animal Facility Disaster Planning Guidelines				
Agencies and Institutes	UCLA (PDF)					
Associations, Centers, and Foundations	University of	University of Georgia (UGA) (PDF) Animal Care Program Disaster/Contingency Plan				
Training Resources	University of Management	Michigan, Division of	Public Safety and Security,	Emergency		
Animal Care and Use Staf	f University of	Mississippi				
IACUC Members and Staf	f University of	University of Tennessee Health Science Center, (PDF) Disaster Planning for				

#### Helpful Links https://disasterinfo.nlm.nih.gov/pandemic-influenza



Also available in Spanish. Centers for Disease Control and Prevention, U.S. Department of Health and Human Services **Example Pandemic Readiness Planning for Animal Programs** 

- Personnel planning
- Supply and logistics planning
- Animal husbandry and health planning



Prepare for communication failures

- Keep emergency contacts list up to date
- Share the list with key staff
- Quarterly review and update recommended



Identify all essential positions in sufficient quantities to maintain animal facility operations:

- Cage wash
- Autoclaves
- Inventory of materials
- Ordering of critical materials
- Animal husbandry
- Veterinary treatment
- Surgical support
- Record keeping

Identify all essential positions in sufficient quantities to maintain animal facility operations:

- For each position, identify names of 3 alternates
- Review at least semiannually the responsibilities associated with each position
- Keep necessary functions operating!



Develop and conduct cross-training for animal care and administrative staff

- Ensure all critical operations can continue
- Be creative: nontraditional expectations for which people do what jobs
- For example: Who will open and distribute the mail?



Consider a continuity of services plan

- NIH intramural program, Division of Veterinary Resources model plans for rodent, ungulate, carnivore and nonhuman primate facilities (see handout)
- Plans link staff reductions in different tiers with the effects on various functions and how to mitigate the effects

## **Supply and Logistics Planning**



Identify on-site stockpile locations for critical items

- Recommend 1-2 month supply with normal usage
- Include:
  - Animal feed and bedding
  - Personal protective equipment
  - Disinfectant and cage wash supplies
  - Hand sanitizers for personal hygiene



## Supply and Logistics Planning

Develop alternative sources for critical supplies

- Consider extended lead times for delivery when planning how much to stock pile
- Stay alert to state and federal authorities and when stockpiling may be indicated



## Supply and Logistics Planning

Maintain at least one type of alternative communication capability within the facility

- Two-way radios
- Cell phones
- Text messaging



Establish key foot patterns to follow between clean and dirty areas of the facility

- Fewer staff with multiple functions
- Don't compromise animal health

Animal Husbandry & Health Planning https://www.cdc.gov/coronavirus/2019ncov/communication/videos.html



Conduct training on prevention techniques – COVID-19 video examples:

- How to protect against novel coronavirus
- How does COVID-19 spread?

Other examples from CDC on YouTube:

- What you need to know about hand washing
- Prepare your home for an emergency



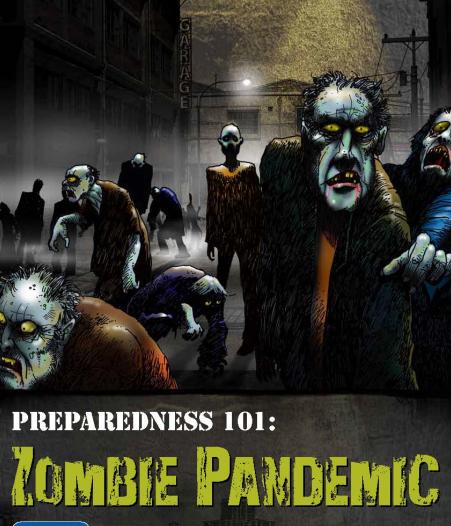
- https://www.cdc.gov/coronavirus/2019ncov/communication/videos.html
- Stop the Spread of Germs poster
- Symptoms of Coronavirus Disease 2019 poster
- Wash Your Hands posters





U.S. Department of Health and Human Services Centers for Disease Control and Prevention

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5. Department of which and Human Services riters for Disease ritrol and Prevention

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#### **ALL-HAZARDS EMERGENCY KIT**

Assemble the following items to create a kit for your home, office, school, or vehicle:

🗆 Water—one gallon per person, per day

- Food nonperishable, easy-to-prepare items (minimum 3 day supply)
  Flashlight
- □ Battery-powered or hand-crank radio (NOAA Weather Radio, if possible) □ Extra batteries
- First aid kit (whistle, antibiotic ointment, bandages, face masks, gloves and reference book)
- □ Medications (7 day supply and medicinal dispensers if necessary)
- Multipurpose supplies (wrench, pliers, plastic sheet, duct tape, scissors, matches)
- Sanitation/personal hygiene items and bleach
- □ Copies of personal documents (medication list and pertinent medical information, proof of address, deed/lease to home, passports, birth certificates, insurance policies)
- Cell phone with charger
- □ Family Disaster Plan (family and emergency contact information) □ Extra cash
- □ Emergency blanket, extra clothes, sleeping bag (1 for each person) □ Map(s) of the area

#### Consider the needs of all family members and add supplies to your kit. Suggested items to help meet additional needs are:

Specific medical supplies (hearing aids/extra batteries, glasses, contact lenses, syringes, cane)
 Baby supplies (bottles, formula, baby food, diapers)
 Games and activities for children
 Pet supplies (collar, leash, ID, food, carrier, bowl)
 Two-way radios





For more information visit: www.cdc.gov/phpr





- Transmission from humans to animals in a research setting has NOT been reported!
- BUT, experimental studies are ongoing in ferrets, pigs, macaques and transgenic mice.



- Animal care staff who develop symptoms should not report to work.
- Follow state and federal requirements for testing, quarantine and isolation



Develop alternative procedures to allow fewer staff to manage the husbandry

- Extended cage changing schedule
- Extended sanitizing schedule
- If outside the *Guide* IACUC approval
- Add more bedding to rodent cages
- Less frequent replacement of feed in rodent hoppers



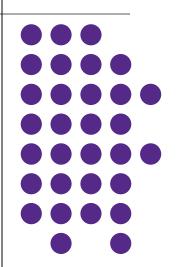
Develop plans for extended use of protective clothing or alternatives.

- Don't discard masks, gloves, coveralls as frequently
- Use of durable equipment instead of disposable

Consider sanitization and reuse

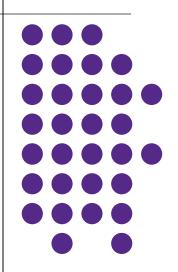
- https://www.cdc.gov/niosh/topics/hcwcontrols/rec ommendedguidanceextuse.html
- https://www.cdc.gov/coronavirus/2019ncov/hcp/respirators-strategy/index.html

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#### **Semiannual Inspections**

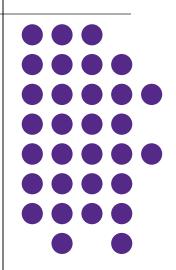
Should Assured institutions add language in their Assurance regarding suspension of semiannual inspections in emergencies and performing them when the emergency ends?



If this is acceptable, does this change need to be approved by OLAW first or can OLAW be notified during the annual report?



What is the best way to document delayed/cancelled semiannual inspections to ensure that the timeline is noted for possible inspections?

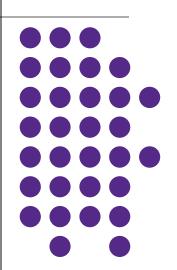


For minor deficiencies identified on the semiannual inspection and review, how should we determine a date for corrective action plan in place given the pandemic?

Would a statement "*x period of time after operations are resumed*" meet OLAW and USDA expectations?



May we use one person to give virtual tours to other IACUC members to conduct semiannual inspections?



## Semiannual Inspections

#### **Question 6**

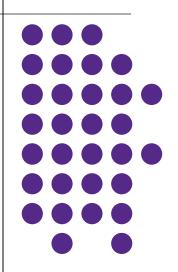
"The IACUC may invite ad hoc consultants to assist in conducting the evaluation. However, the IACUC remains responsible for the evaluation and report."

Is using *ad hoc* consultants acceptable for facility inspections and program reviews?

What are best practices when using *ad hoc* consultants?

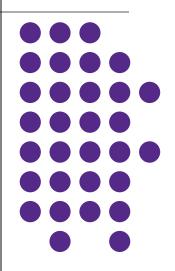


At many institutions, the essential personnel available to conduct the inspections may also have supervisory roles over parts of the facility. Is this considered a conflict of interest?



How can institutions use a recently completed AAALAC site visit as a substitution for institutional-led site inspections during the pandemic?

Could you provide guidance as to timelines under which this would be suitable?



#### **Animal Study Protocols**

### Animal Study Protocols Question 1

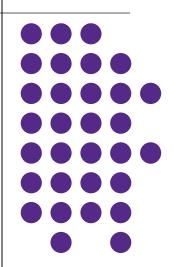
If investigators "pause" animal work due to the pandemic, preventing congruency with the approved protocol timeline, what is required of the investigator/IACUC?

Is it acceptable to issue a blanket a blanket statement allowing investigators to alter timelines, rather than requiring each PI to amend their study?



### Animal Study Protocols Question 2

What is expected of the institution for investigators finishing animal experiments up sooner than expected because of a shut down or other issues?



### Animal Study Protocols Question 3

When veterinary resources are focused on animal care and well-being during the pandemic, and they are unable to participate in protocol review and consultation, how can research institutions comply with the PHS Policy and the Animal Welfare Act **Regulations?** 



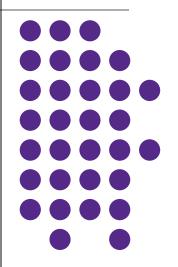
#### **IACUC Business**

#### **IACUC Business**

#### **Question 1**

During pandemics, will quorum requirements be relaxed in case the IACUC has to be convened to make decisions at short notice?

What about under the direction of the IO only?



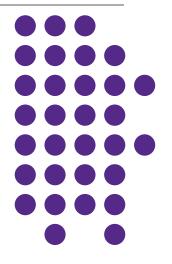
#### **IACUC Business**

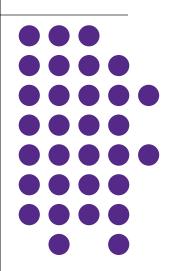
#### **Question 2**

Please explain what is meant by "access to technology" for IACUC business conducted using telecommunication

Details about using electronic means to conduct IACUC meetings can be found in Section 7.1.8 of the Animal Welfare Inspection Guide.

<u>https://www.aphis.usda.gov/animal\_welfare/</u> <u>downloads/Animal-Care-Inspection-Guide.pdf</u>

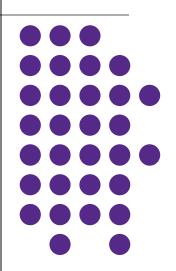






### USDA Question 1

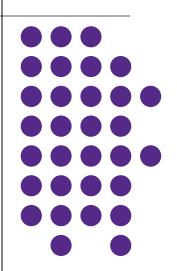
Is the USDA offering any flexibilities in completing semiannual inspections and review due to COVID-19?



## USDA

#### **Question 2**

Will VMOs still be doing routine inspections during the COVID-19 pandemic?

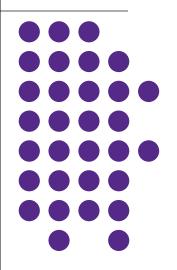


### USDA

#### **Question 3**

For USDA inspections, we may have limited resources to provide documentation and tours to a USDA inspector.

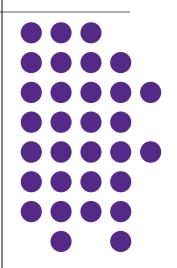
Have inspectors been given any guidance on how to proceed with site inspections to ensure social distancing or limited resources?



### USDA

#### **Question 4**

If facilities do not want 2 people in the facility simultaneously, could one person write a facility inspection report and a second person add to it as they do a separate inspection?



### Other Topics Question 1

Can OLAW provide examples of disaster plans regarding COVID-19 pandemic and campus closures?

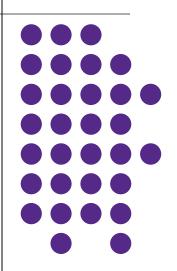
### Other Topics Question 2

If our institution mandates that all personnel must work remotely for an extended period of time, whose responsibility is it for designating essential personnel needed to care for our research animals? The IACUC or the IO?



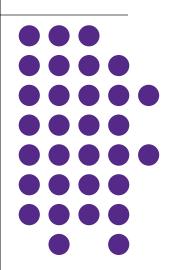
### Other Topics Question 3

How can we continue to perform post approval monitoring (PAM) activities when access to animals or animal housing areas are minimized or restricted due to COVID-19?



#### **Question 4**

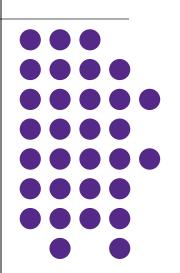
Do we need to update OLAW, NIH, or USDA on our outcome during the recovery stage?



#### **Question 5**

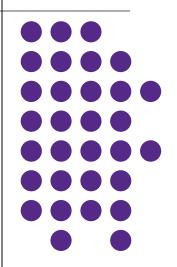
If personnel training expires during this pandemic, what are the consequences?

Can they still work with the animals?



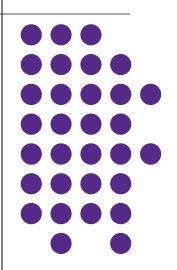
#### **Question 6**

Should any deviations to standard practices related to COVID-19 be captured in the annual report to OLAW or USDA?



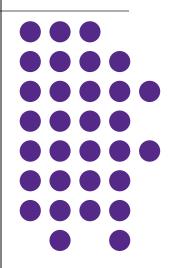
#### **Question 7**

What are OLAW and USDA's guidance on using electronic signatures (vs. "wet" signatures) for official documents (e.g., semiannual programmatic report)?



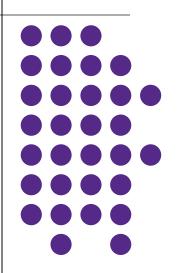
#### **Question 8**

If animals already on study need to be euthanized because the university has shut down, what type of documentation and/or reporting is expected of each IACUC?



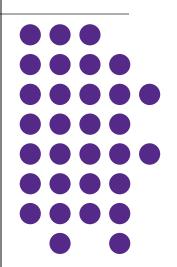
#### **Question 9**

If animals already on study were scheduled for post-operative analgesia (or other required treatments) but the university shut down before the administration could occur, is this considered protocol noncompliance?



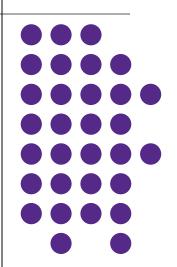
#### **Question 10**

## Do we need to report institutional closures to OLAW or USDA?

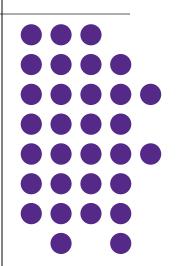


#### **Question 11**

Will there be any flexibilities with three year complete reviews?



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#### Animal Research and Public Support: A 2020 Vision for Strategic Communications and Micro-Messaging

Paul McKellips OLAW Online Seminar June 11, 2020