

Sample Institutional Policy/Procedure for Conducting IACUC Business in the Event of a Pandemic or Other Significant Emergency

Background: The US Centers for Disease Control and Prevention (CDC) has suggested institutions should plan for absenteeism of ~40% if a contagion such as the H1:N1 influenza virus should reach pandemic status. Regardless of external events, the Office of Laboratory Animal Welfare at NIH (OLAW) expects each institution's IACUC to continue to conduct business according to requirements found in the PHS Policy, the Animal Welfare Act and Regulations, and the Guide. See [How can institutions and their IACUCs best prepare for a pandemic?](#)

A. IACUC Meetings.

1. Background:

- a. The IACUC must have at least 2 meetings a year, 6 months apart.
- b. A convened meeting with a quorum present must conduct the following:
 - 1) Suspension of a protocol
 - 2) Full committee review of protocols
- c. While optimal, there is no requirement to conduct the semiannual review of programs at a convened meeting with a quorum present.
- d. Use of audio/video conferencing is permissible.

2. Recommendations:

- a. As there is no requirement for suspensions and no activities have been suspended by this IACUC in the past three years, continue to find ways to correct problems without suspending protocols.
- b. Change the institution's protocol review policy to allow for Designated Member Review of all protocols if external situations comprise the ability to convene a meeting of a quorum. See below.
- c. Assemble as many members as possible to conduct the semiannual review of programs, a minimum of two is required. See below for inspections.
- d. Approve/accept semiannual report to the IO via electronic means (email, and/or fax). A majority of the members must sign the report to the IO and can do so via email or fax.
- e. Encourage members to participate via teleconference.

B. Protocol Review.

1. Background:

- a. The only federal requirement for the full committee to review a protocol is when an IACUC member specifically requests full committee review of a given protocol. See [IV.C.2](#) and [2.31.d.2](#).
- b. The institution's IACUC currently requires certain protocols to be reviewed by the full committee:
 - 1) Procedures may cause the animals pain or distress (i.e. survival surgery, Non-survival surgery, tumor burden studies, transplantable tumors, death as an endpoint, drug studies, prolonged restraint).
 - 2) Modifications of approved protocols to include procedures that have the potential to cause the animals pain or distress.
 - 3) Research protocols that will not receive peer-review.
 - 4) Protocols from new investigators.
- c. Full committee review (FCR) can only occur at a convened meeting with a quorum present.
- d. Chair must appoint Designated Member Reviewers.
- e. Every protocol involving USDA regulated species must be reviewed annually.
- f. Every protocol for a PHS funded activity must have a complete review every three years.

- g. All modifications and amendments must be reviewed before changes can be made to any on-going protocol.
- 2. Recommendation: Amend the institution's protocol review policy to:
 - a. Allow for Designated Member Review of all protocols during the period of an emergency. All members will be notified 'prior to the review' as required.
 - b. Authorize the IACUC Vice Chair to appoint Designated Member Reviewers if the Chair is unavailable for an extended period.
 - c. Authorize the IACUC administrator/director to appoint Designated Member Reviewers if both the Chair and Vice Chair are unavailable for an extended period.

C. Semiannual Inspection of Facilities.

- 1. Background.
 - a. Every facility in which USDA regulated species are housed for more than 12 hours must be inspected twice a year, 6 months apart, by at least 2 members of the IACUC.
 - b. Every facility in which agricultural animals are housed for more than 12 hours must be inspected twice a year, 6 months apart. Agents of the IACUC can conduct the inspections. As this is an Ag Guide 'requirement' not backed by federal regulations, institutions have much more flexibility in managing these inspections.
 - c. Every facility in which animals on PHS funded grants are housed for more than 24 hours must be inspected twice a year, 6 months apart. Agents of the IACUC can conduct the inspections.
 - d. Every lab and/or facility in which animals on PHS funded grants are used in surgical procedures must be inspected twice a year, 6 months apart. Agents of the IACUC can conduct the inspections.
 - e. All vehicles used for transport of animals must be inspected twice a year, 6 months apart. Agents of the IACUC can conduct the inspections.
- 2. Recommendation:
 - a. Train veterinary technicians or other appropriate staff members in the animal care and use program to conduct facility inspections properly and have them assist with inspections as agents of the IACUC. This will be added to the institution's policy.
 - b. If personnel are not available, consider inspecting agricultural facilities at least annually.