

## Report on Research Compliance Volume 16, Number 3. March 01, 2019 OLAW Webinar Provides Details On Semiannual Program Reviews

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By Theresa Defino

Institutions whose animal research must comply with the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals are required to inspect animal facilities and review their “program for humane care and use of animals” no less than every six months.

Although program review can be guided by a checklist developed by the NIH Office of Laboratory Animal Welfare (OLAW), institutional animal care and use committees (IACUCs) would be well-served to also use the experience to improve operations.

“Since robust programs continue to evolve based on new discoveries in, for example, the field of veterinary medicine, the review can be used as an opportunity to ensure the program continues to reflect current best practices,” said William Greer, assistant vice president for research compliance oversight at the University of Michigan (UM).

A review “gives institutions the opportunity to update written documents after IACUC discussions; once the documents are reviewed by the committee, these reviews can be documented and maintained through the compliance office. In addition, the opportunity allows committee members to reconsider past decisions and enhance practices that ultimately may improve the overall quality and efficiency of the program,” said Greer.

Greer, one of two speakers at OLAW’s recent webinar on semiannual program review, also suggested it can be “a source of ongoing training for committee members,” giving them “the opportunity to ask specific questions about various components of the program, which ultimately improves their understanding of the overall animal care and use program and more importantly their role as a committee member.”

Dawn O’Connor, assistant director for regulatory compliance for UM’s Animal Care and Use Office, joined Greer in the webinar. Both previously spoke about the related topic of semiannual facility inspections during an OLAW webinar last summer (“U. of Michigan Provides Insights Into Inspections of Animal Research Sites,” RRC 15, no. 8).

During the webinar, the last of 2018, Greer, O’Connor and Neera Gopee, acting director of OLAW’s Division of Policy and Education, also answered more than a dozen questions.

### **Checklist Requires Customization**

The purpose of the review is to ensure that programs “are consistent with governing standards,” particularly those contained in the *Guide for the Care and Use of Laboratory Animals*, and regulations implementing the Animal Welfare Act (AWA), Greer explained, noting that these “specifically list, for example, the roles and responsibilities of the IACUC, the prescribed living conditions of the laboratory animals, and the components of the veterinary care program.”

He added that when “the primary guidance documents may not include the relevant information as it relates to

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some specific animal activities...other standards may be used to complement the program review,” such as when birds are used in research.

When reviewing an animal care and use program, “the IACUC should ensure compliant methods for program oversight and support have been established, verify that the husbandry practices meet the *Guide* expectations, and that the veterinary care program and the physical plant conditions meet and also satisfy the expectations,” said Greer.

One way to start is to use a checklist developed by OLAW, which is divided into two parts: institutional policies and responsibilities and veterinary care. The institutional policies portion has 12 sections that address routine operations such as IACUC membership, responsibilities and record-keeping, and occupational health and safety of personnel. Newer topics address disaster planning and emergency preparedness, IACUC training, and “investigating and reporting animal welfare concerns” (see <http://bit.ly/2TVwAnG>).

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