OLAW Webinar and Web Resources on Pandemic Planning

Guide notices – Flexibilities for IACUCs, Telecommunications, and Pandemics

Semiannual (OLAW)

* 30 day beyond six month interval as long as no forward drift
* Any qualified individual can conduct inspections as an ad hoc
* 1 qualified individual can conduct inspections

IACUC and Facility Function (OLAW)

* If unable to conduct semiannual inspection a waiver may be requested by authorized institutional representative.
* Other waiver eligible functions (send to olawdpe@mail.nih.gov)
  + Program review
  + Prepare letter to IO and make recommendations
  + Review animal activities or significant changes
  + Suspend an activity
  + Review concerns of care and use
* Pandemic FAQs (see OLAW FAQs)
  + Mandatory to maintain appropriate staffing
  + Cross training
  + Adequate inventory (food/bedding/PPE/cleaning supplies) – stay alert to stay ahead on supplies
    - Reuse of equipment (sanitize) or use durable equipment instead of disposable
  + Must be constituted and conduct official business
  + Approval terms for protocols are still in place
  + Alternatives to face-to-face meetings
  + Expand use of designated member review
* Pandemic Maintenance
  + Up-to-date contact information
  + Identify essential functions related to materials, cagewash, record keeping, husbandry
    - Identify backup personnel and cross train
  + Continuity of services
  + Prevention, protect yourself from getting sick
    - If you get sick notify supervisor, follow CDC guidelines
  + Extended cage change and equipment sanitization schedules
    - Outside of the *Guide* must obtain IACUC approval
    - Use extra bedding if extending change interval

USDA:

Inspections:

* VMO are still inspecting, but won’t if not safe
* Semiannual, may be delayed as long as necessary and should be resumed once business as usual resumes
* Email Dr. Crowley
* The regs do not specify how members must be involved (can use virtual activities)

Q and A

* Report teleconference as an update during annual reporting
* Report deviations from the Guide in semiannual
* USDA – “document what you are doing”
* How to determine a date for corrective action –
  + For minor deficiencies “what period of time after normal operations resume”
* Virtual tours are acceptable
* Facility personnel conducting inspections is not a conflict of interest if others are involved (USDA agrees)
* Can investigators pause their protocols – yes. Make sure protocol approval timelines are in place
* If NIH work cannot be completed as described the PI is to contact the PO
* Quorum requirement remains in place for conduct of business
* What if animal euthanasia is necessary for proper maintenance – must be within the AVMA Guide and in consultation with the AV
* E-signatures are acceptable on semiannual documents
* If appropriate animal care cannot be maintained (specific example was if not analgesia is available) an alternative should be considered
* No flexibility in regard to IACUC approval terms.