Module II: The Three P’s: Managing Policies, Procedures and Protocol Review

MJ Shepherd

Comparison Chart Policies/Guidelines/Procedures

<table>
<thead>
<tr>
<th>Nature and Scope</th>
<th>Policy</th>
<th>Guidelines</th>
<th>Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Broad philosophies to specific rules</td>
<td>accepted methods of achieving an outcome</td>
<td>tangible, precise, exact, specific, factual</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Type of Writing</th>
<th>Policy</th>
<th>Guidelines</th>
<th>Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Usually standard sentence and paragraph format</td>
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<td>Best expressed using special formats like lists, flowcharts</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>What to Include</th>
<th>Policy</th>
<th>Guidelines</th>
<th>Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>What the rule is why it exists when it applies whom it covers enforcement, consequences emergency contacts how to get help</td>
<td>Actions, alternatives, help sections, examples, references</td>
<td>Actions, who is responsible, emergency procedures, warnings and cautions</td>
<td></td>
</tr>
</tbody>
</table>

Thank you to Deb Frolicher and Natalie Mays

IACUC Administrator Responsibilities:

Recommended policies:

Michigan State University has an overarching ‘policy’ to be in compliance with the AWA, PHS Policy, and both Guides and does not make specific policies when one of these documents states that an institution must do something.

IACUC Administrator Responsibilities:

Recommended policies:
- Collaborations, sub-contracts, off-site activities – MOUs
- Use, reuse, and long-term retention of animals

Environmental enrichment & socialization for all species

Enrichment Strategies for Laboratory Animals

Various perspectives plus suggestions for Laboratory Rodents
Rabbits
Nonhuman Primates
Cats and Dogs

ILAR Journal V46(2)
March 2005

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  - www.aclam.org/education-and-training/position-statements-and-reports
  - See bottom of page 114 of the Guide!
**IACUC Administrator Responsibilities:**

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- Authority of the attending veterinarian
- Disaster, security, and/or crisis management

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*Wall Street Journal*

4/16/09

**IACUC Administrator Responsibilities:**

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- Use, reuse, and long-term retention of animals
- Environmental enrichment & socialization for all species
- Authority of the attending veterinarian
- Disaster, security, and/or crisis management
- Training and occupational health and safety programs

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### IACUC Administrator Responsibilities:

**Recommended policies:**
- Some protocol related topics
  - Amelioration of pain & distress
  - Humane endpoints
  - Use of anesthesia and analgesia
  - Genotyping
  - Euthanasia
  - Survival Surgery
  - Oocyte Harvest in Xenopus
  - Food/Water Restriction
  - Physical Restraint

### IACUC Administrator Responsibilities:

**Procedures/processes to have in writing:**
- Reviewing concerns, noncompliance, and suspensions
- Significant changes to protocols
- Protocol review processes
  - DMR and FCR
  - DMR subsequent to FCR
  - Annual reviews
  - Modifications

### IACUC Administrator Responsibilities:

**Handling Policies/Procedures:**
- Who initiates the documents?
- Who participates in development?
- Review and/or approval processes?
- Determine ‘ownership’
- Who is responsible for dissemination?
- How frequent should they be reviewed?

IACUC Administrator Responsibilities:

Developing recommended policies/procedures:
- www.IACUC.org
- Your friends (networking)
- Your scientists
- AAALAC Position Statements
- Templates from this course, IACUC 101, and other conferences

The Administrator’s Role in Managing Protocol Review

Protocol Review
What are the Requirements?

External requirements and expectations:
- U. S. Government Principles
- USDA Regulations - 9 CFR, Subpart C 2.31 (d) (e)
- USDA Animal Care Policies 3, 11, 12, and 14
- PHS Policy - IV, C, D
- VA Handbook 1200. 7 – 8
- IACUC Guidebook - Section C. 1 - 3

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External Requirements
Scientific Merit Review?

- PHS
  - Consistent with sound research design
  - Animals selected... Should... obtain valid results
  - Procedures... for the conduct of scientifically valuable research

- USDA
  - Rationale for...and... appropriateness of species and number
  - Do not unnecessarily duplicate previous experiments
  - Procedures... for conduct of scientifically valuable research

Guide
Scientific Merit Review?

- Scientific elements as they relate to animal use and welfare should be evaluated
- Members may seek input from outside experts
- Members may request a scientific review if none has been done

External Requirements
Scientific Merit Review?

However...

"Except as specifically authorized by law or these regulations, nothing in this part shall be deemed to permit the Committee or IACUC to prescribe methods or set standards for the design, performance, or conduct of actual research or experimentation by a research facility."

9CFR2.31(a)
## Protocol Review
### Know and facilitate the requirements

**Internal requirements and expectations:**

- Your institution’s PHS Assurance + AAALAC PD
- Your institution’s written description of protocol review procedures
  - Be familiar with the OLAW FAQ regarding FCR/DMR and DMR subsequent to FCR
  - How about the significant change guidance?

### Identify and provide resources:

- Protocol form
- Copies of internal documents and policies
- Checklists and review guidelines
- Process requirements
- Internet access and laptops if necessary

## IACUC Training in Protocol Review
### Know and facilitate the requirements

- **OJT**
  - IACUC meetings - provide regulatory updates
  - Mentoring
  - Newsletters and journals
    - Lab Animal
    - ILAR Journal + publications
    - SCAW publications
- **Formal**
  - PRIM&R Conferences & Workshops
  - IACUC 101
  - SCAW Conferences
  - Web based training
  - State biomedical research society meetings
  - Webinars
### AAALAC Most Common Protocol Review Deficiencies

- Endpoints
- Use of non-pharmaceutical grade substances
- Analgesic use inadequately described or no justification for not administering analgesics
- General inadequate descriptions of animal use

*Ref. AAALAC International Conference 2014*

### Methods of Review

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<thead>
<tr>
<th>Full Committee Review</th>
<th>Designated Member Review</th>
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<td>- approval only after review at a convened meeting of a quorum of the IACUC and with the approval vote of a majority of the quorum present.*</td>
<td>- approve, require modifications in (to secure approval) or request full committee review -- by at least one member of the IACUC, appointed by the Chair and qualified to conduct the review</td>
</tr>
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*PHS IV.C.2 & 9CFR 2.31(d)(2)*

### Designated Member Review

- Every member must have the opportunity to call for full Committee review
- DMR procedures should be described in writing
- Document the DMR review process
- Chair -- Designates qualified reviewer(s)
Considerations in DMR

The DMR approval has equal validity to FCR approval and does not require subsequent re-approval or notification by a convened meeting.*

- Lab Animal 31(9):28-31, 2002

“If a protocol is assigned more than one designated reviewer, the reviewers must be unanimous in any decision.”

“They must all review identical versions of the protocol and if modifications are requested by any one of the reviewers then the other reviewers must be aware of and agree to the modifications.”

- grants.nih.gov/grants/olaw/faqs.htm

Use of DMR Subsequent to FCR

- If all members are not present --
  - All members agree in advance in writing that a quorum… may decide by unanimous vote to use DMR subsequent to FCR...
  - The institution should specify its intention … in its Assurance with OLAW
  - … if the IACUC lacks written standard procedures, the IACUC has the option to vote to return the protocol for FCR or employ DMR. In this case, the revised protocol must be available to all members to have opportunity to call for FCR.

  http://grants.nih.gov/grants/olaw/faqs.htm#proto_19

Use of telecommunications for a convened meeting MAY be used

- All members are given notice of the meeting.
- Documents normally provided to members during a physically-convened meeting are provided to all members in advance of the meeting.
- All members have access to the documents and the technology necessary to fully participate.
- A quorum of voting members is participating.
- The forum allows for real time verbal interaction equivalent to that occurring in a physically-convened meeting (i.e., members can actively and equally participate and there is simultaneous communication).
### Use of telecommunications (cont)

- If a vote is called for, the vote occurs during the meeting and is taken in a manner that ensures an accurate count of the vote. A mail ballot or individual telephone polling cannot substitute for a convened meeting.

- Opinions of absent members that are transmitted by mail, telephone, fax or e-mail may be considered by the convened IACUC members but may not be counted as votes or considered as part of the quorum.


### Types of Protocol Reviews

**Required:**
- New protocols - initial review
- Annual review (USDA 9CFR 5.231. (c)(5))
- Triennial review (PHS 3. C. 5.)
- Significant modifications (amendments)

**Other Protocol Reviews:**
- Protocol Audits
- Adverse Events
- Noncompliance or violations

http://grants.nih.gov/grants/olaw/faqs.htm#proto_9

### Annual Reviews

- Do you use an annual review form – is it adequate?
- Do you have a system for identifying protocols due for review?
- Are researchers notified?
- Is there a process to track for non-responses to notifications?

Triennial Reviews

- Are researchers notified? Repeat?
- Is there a process to track for non-responses to notifications?
- Is there a process for expired protocols?
- Do you have “holding protocols”?
- What about externally funded expired protocols?

Getting Around Late Protocol Renewals: Lab Animal, Volume 36, No. 7

Amendments/Modifications

- New guidance on significant changes
- Need guideline for identification of significant changes
- Include examples of minor vs. significant changes
- Research community should have access to guidance

Implementing the Review Process

Pre-Review Management

- Establish deadlines for applications (if appropriate)
  - Notify PIs of protocol expirations
    - Annual
    - Triennial
- Pre-screen protocols, annual reviews & modifications (amendments)
- Conduct administrative pre-reviews
- Chair assigns designated reviewer(s)

Implementing the Review Process
Pre-Review Management

- Administrative Pre-review Considerations:
  - Check for completeness
  - Adequate responses to the three R's (USDA Policy 12 requirements)?
  - Appropriate pain category classification?
  - Personnel -- qualifications on file?
  - Funding Source -- need COI review?
  - Hazardous agents – need EHS review?
  - Exceptions/departures?

Implementing the Review Process
Pre-Meeting Management

Prioritizing the review process:

Consider:
- Level of pain/distress
- Species being used
- Types of procedures
- Will study be peer-reviewed?
- New protocol or annual renewal?

Pre-meeting with Chair, AV and Administrator?

Implementing the Review Process
During a Full Committee Review Meeting:

- Assure that there is a quorum
- Provide regulatory advice (have documents on hand)
- Have institutional policies and procedures on hand
- Record votes, rationale, etc.
- Assure that any conflict of interest issues are not overlooked.
- Provide relevant input

### Protocol Review Subcommittee Meetings (DMR)
- Does your institution use subcommittees for designated member protocol review?
- How do they work?
- Are they compliant?

### Implementing the Review Process After the Meeting...
- Breathe!
  - Prepare an action item checklist
  - Obtain review comments
  - Draft protocol correspondence
  - Assist PI’s in interpreting and responding to concerns
  - Follow up on policy issues and any other meeting items

### Document Protocol Review Activity
**Full Committee Review**
- Presence of a quorum at meeting (including members present and absent)
- Committee deliberations
- Decisions

**Document Protocol Review Activity**

**Designated Member Review**
- Evidence of opportunity for members to call for full committee review
- Identification of the designated member(s) appointed by the Chair
- Decision of the designated member(s) (cannot withhold approval)
- Applies to original, annual, triennial and amendment/modification reviews

**Document Protocol Review Activity**

- Notify investigators and research facility in writing of action taken.
  - Approve
  - Modifications required to secure approval
  - Approval withheld
    - For protocols that were not approved state reasons for this decision and provide an opportunity to respond in person or in writing. ([9CFR2.31(d)(4) & PHS IV.C.4](#))
  - Species and number of animals approved
  - Period of approval (Expiration date!)