Postapproval Monitoring Without Hiring Additional Personnel
or
MAKING CURRENT ACTIVITIES COUNT FOR POSTAPPROVAL MONITORING

1. Post protocol review:
   a. Request to increase number of animals
   b. Request to modify or amend a protocol
   c. Report of adverse event(s)
   d. Breeding reports
      i. Principal Investigator (PI) should provide written documentation for a-d above with sufficient
         information and/or justification for IACUC assessment.
      ii. PI's written documentation should be compared to the approved protocol, with additional
          information requested as necessary.
      iii. Maintain documentation of i-ii above. This could be an ‘approval’ or ‘acceptance’ memo, email, or letter.
   e. Annual continuing review
      i. Ask the PI to provide the following information in writing:
         1. What did you do last year?
         2. How many animals did you use?
         3. What are you planning to do next year?
         4. How many animals do you need?
         5. Justification of 3-4 above.
      ii. For externally funded work, ask for report to the funding agency.
      iii. PI’s written documentation (i-ii above) should be compared to the approved protocol, with additional
          information requested as necessary.
      iv. Maintain documentation of i-iii above. This could be an ‘approval’ or ‘acceptance’ memo, email, or letter.
   f. Triennial review
      i. Same as d. above plus
      ii. The literature search must be up-dated, and
      iii. Ask for copies of relevant publications.
         NB. This gives you the big picture of what the PI is doing and how the research is
         progressing as opposed to looking at the re-written protocol in isolation or as a ‘new’ study.

2. Semiannual inspection of PI labs
   a. “Each assured institution, acting through its IACUC or facility veterinarian, is responsible for all
      animal-related activities at the institution regardless of where the animals are maintained or the
   b. Visit every lab where animals are used at least once a year (twice for PHS-funded activities
      which include surgical procedures). At a minimum, visiting one lab a month will give you a
      good idea of frequency of noncompliance across campus.
   c. Start with high profile work or PIs with a noncompliance history

3. Reporting and reviewing concerns
   a. When reviewing concerns that are directly related to a particular project or PI, review all
      relevant protocols, including amendments, modifications, inspection reports, and post approval
      monitoring reports.
   b. Maintain documentation of assessment of a. above.
Making Current Activities Count for Postapproval Monitoring

4. Physical plant
   a. Personnel in units such as housekeeping, security, grounds and building maintenance, and EHS, can be invaluable allies by anonymously reporting any of the following:
      i. Animals housed overnight outside the vivarium without IACUC approval
      ii. Unattended anesthetized animals
      iii. Animals housed in other than approved cages/containers (like shoeboxes in filing cabinets)
      iv. Carcasses in trash cans
      v. Needles on the floor instead of in the sharps container

5. PI visits
   a. Keep records of any interactions with PIs which include discussion of on-going research/teaching activities:
      i. Especially if such discussions lead to revisions of an approved protocol
      ii. Consultations regarding changes in anesthesia, analgesia, and/or euthanasia
      iii. On-going overcrowding situations

Recommended reading:
- Guide for the Care and Use of Laboratory Animals, Chapter 2, National Research Council 2011.