IACUC Improvements: Facilitating Research

Deregulation

1. **Eliminate annual renewals for most IACUC protocols** (completed). 772 protocols had their approval automatically extended. However, federal regulations still require us to perform annual reviews for studies utilizing covered species and those protocols funded by the VA and the Department of Defense. Protocol approval dates have been adjusted to account for this change. PI’s will be notified at 90, 60 and 30 days for anyone still needed annuals and for all those requiring a triennial.

2. **Policy changes** (some completed, ongoing): Several policy changes have been made and others are being looked at. A few of those approved changes are the following:
   
   A) The Policy for Calibration and Verification of Balances is now a Guideline only; however, it still will be a requirement, *as it always has been*, for individuals performing feeding/fasting studies.
   
   B) The 14 day drug ‘shelf life’ requirement has also been changed. For diluted drugs the policy will now be lengthen to 30 days. This change has been made in our “Policy for approved drug use in protocols” and in “IACUC policy on expired drugs, supplies, and materials for use on or in animals for research, teaching or Testing.
   
   C) A new policy was approved for the use of anesthetic cocktails (ketamine/xyazine and ketamine/xyazine/acepromazine). The expiration date has been extended to 180 days or the earliest expiration date of any single compound used, whichever is first. Previously all drug compounds mixtures were only approved for 14 days in our previous policy. See new policy “Policy for the use of anesthetic cocktails and diluted drugs in laboratory animals”.
   
   D) The policy on expired drugs was reviewed and simplified.
   
   E) A new policy for axolotl housing and enrichment was developed with consultation with users and a 6 month time was provided before implementation of policy to give users time to make changes.
   
   F) Revised and updated policy for the use of medical grade gases in animal research.
   
   G) Revised and updated Policies for animal transfers and annual protocol review.
   
   H) Approved a policy on the use of novel compounds for a new investigator

3. **Policy elimination** (ongoing): We plan to review each of our policies to determine if they are absolutely essential and insure that the policy at least references the particular federal rationale for the policy.

Timeliness

4. **Reduce membership consideration period**. Previously the 7 day membership consideration period was combined with the 7 day veterinarian and EH&S review period, reducing this review time from 14 calendar days to 7. More recently we reduced the 7 day membership consideration/vet/EH&S period to 3 calendar days. This probably will not impact much on the
review process for new protocols, but should significantly reduce the time for any remaining annual reviews and hopefully shorten the review time for some modifications. Note: federal regulations do require a member consideration period, but do not specify any time frame. 3 calendar days was the shortest period of time that accounts for weekends.

Navigation

5. **IACUC web site has been redesigned** (completed) from over 50 different web pages to only 6 pages. Most topics are contained on the home page and are easily viewed without ever leaving the page (information is sorted by topics and when clicked more information appears). Researchers expressed difficulty finding policies and other information because it was buried in the site. The new site is live and is mobile-friendly.

6. **Consolidate IACUC & ACS policies** (ongoing): We are working with ACS to revise and consolidate some of their policies and our policies so that all can all be found on one – easy to find- web site. This is an ongoing issue which we hope to complete by the Fall of 2017.

Communication

1. **Investigator presentations at full Committee** (completed/ongoing). Starting in Jan of 2017 we have added new feature to meetings. Invite an investigator (preferably a new faculty) to come to our meeting and give a summary of their research to educate the committee and provide open dialog with the PI.

2. **Post-approval surveys** (completed). Whenever a new study is approved by the IACUC, the research team receives an email with a link to an anonymous Qualtrics survey inviting them to tell us about their experience. Respondents are asked to rate IACUC staff, reviewers, veterinarian reviewers, the myIACUC system, and timeliness of review. They are also asked to share any specific problems/opportunities for improvement, as well as any positive experiences. Respondents may provide their contact information in the event we wish to follow up with them to clarify any issues or let them know if we’ve taken any corrective action. To date 44 researchers have submitted the survey (cumulative results without respondents names attached).

3. **Email animal contact forms** (completed). Researchers expressed difficulty processing Animal Contact forms with Occupational Medicine (Occ Med). Occ Med required the form to be faxed in, but there were issues with faxes not being received, lost, etc. We worked with the Privacy Office to allow these forms to be emailed and to set up a process within Occ Med to handle them via email.

4. **Researcher engagement** (completed/ongoing): faculty are being consulted in most changes, from policy/guideline changes, to redesigning the website, SOP development, and others.

Protocol improvements

5. **Remove redundant questions** (completed/ongoing). Subcommittees of IACUC, ACS and PIs have been assembled to look through our newly revised IACUC protocol template to search for
and remove redundancies and provide more explanations, if required. We have already made changes in sections 2 and 3 to reduce any redundancy.

6. **Endpoint summaries** (completed/ongoing): The new revisions on the current form will summarize all the questions that ask about endpoints into one table at the end of the form (item 24-Endpoint summary) as a read only page that can be used by the ACS staff when evaluating animals on protocols.

7. **Integrated training records** (completed): We have integrated training records from myTraining and an external vendor, AALAS, into myIACUC enabling researchers to more easily confirm that study staff has completed required training. This will also greatly enhance IACUC staff efficiency that presently has to manually check thousands of records on all study staff. All training – with courses and training dates are now automatically entered into the protocol – 1.2 Research Training Summary.

8. **Standard Operating Procedures** (ongoing): Discussions are occurring as to how we can entertain and manage SOP’s or some similar type of mechanism that can be utilized by investigators.
   
a. **Assessing mechanism to enable SOPs** (ongoing): We are looking into the possibility of using the newest version of the submission form that the vendor (Click IACUC 8.x) has developed since it has incorporated a variety of procedures within the document that PI’s can chose to use. These would be approved procedures, somewhat like SOP’s that are actually built into the document. This would make it much easier for PI’s to submit their protocols and would shorten the review time as well. Obviously this would be a cost factor. Our IT group is communicating with the vendor on this issue. Also this newest version has incorporated a feature that would be very beneficial for our required semi-annual inspections to insure that we maintain full compliance in this area. It also has built into the form the route for VVC review. In addition we have interacted with CHOP. – the people that helped with the most recent redesign of our smart form – they have some SOP for anesthetics and a couple of other sections that we were able to view. This is a work in progress. Once we decide on going this route or going with the newest version of Huron smart form, we will set up a subcommittee of PI’s (probably from the taskforce, IACUC members and ACS to brainstorm ways to incorporate SOP’s (and how to review them as required).

9. **Standard answers** (ongoing): We are working with ACS to modify some portions of our form to incorporate a ‘standard approved answer’ for various questions so that PI’s would only have to answer the question if they were not using our approved template answer. This would not only help the PI when writing their protocol but also has the possibility of reducing review time since the procedure would already be approved. This process has started – for a new question dealing with endpoints. The next area we will pursue would be item 16 – surgery, starting with pre-op procedures.

10. **VVC review** (ongoing): We have discussed with ACS the possibility of utilizing a VVC (veterinary verification and consultation) form of review. This is a relatively new initiative that the federal agencies has allowed (described in item #2 of Guidance on Significant Changes to Animal Activities NOT-OD-14-126) for some modifications to be reviewed and ‘approved’ by the veterinarian, which could substantially shorted the process for certain modifications. A policy
has been developed and approved by the full committee. Currently we are investigating with IT, how this can be integrated into our review process. A town hall with PI's will need to be convened to explain the process before it goes live.

Other

11. **Undergraduate lab courses** (ongoing): We are still attempting to resolve the issue of undergraduate students taking lab courses to satisfy Risk Assessment issues. Meeting with EH&S and the provost are ongoing.

12. **Committee membership** (completed/ongoing): Since the animal task force was started three members (Drs. Yezierski, Johnson, and Lewin) have been replaced with new members (Drs. Lakshmyya, and Sayler, Scott, respectively).

13. **Metrics** (ongoing): establish and publish metrics to identify pain points, opportunities for improvement, and insure timely/efficient review of research.