**INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE (IACUC)**

***CONTINUING REVIEW FORM***

*To be completed annually*

IACUC#:

PROTOCOL TITLE:

PRINCIPAL INVESTIGATOR:

DATE OF INITIAL APPROVAL:

DEPARTMENT:

CAMPUS ADDRESS: PHONE:

1. **RECORD OF ANIMAL USAGE** (add more rows as necessary)

|  |  |  |
| --- | --- | --- |
| Species | Total # Approved  | # Used to date |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |

1. **[USDA] PROJECT (Pain) CATEGORY:** ❑ C ❑ D ❑ E
2. **PROTOCOL STATUS.** Please indicate the status of this project.

Request Protocol Continuance

❑ A. Active - project ongoing.

❑ B. Currently inactive - project was initiated but is presently inactive.

❑ C. Inactive - project never initiated but anticipated start date is \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

Request Protocol Termination

❑ D. Inactive - project never initiated.

❑ E. Currently inactive - project initiated but project has not/will not be completed.

❑ F. Completed - no further activities with animals will be done.

1. **PROJECT PERSONNEL.** Have there been any personnel/staff changes since the last IACUC approval was granted? ❑ YES ❑ NO

If yes, please complete the following sections (Additions/Deletions). For additions, please submit a completed Personnel Qualification Statement with this Continuing Review Form and make arrangements to ensure the appropriate training is completed.

**Additions:** Name/Role/Responsibility for Project (copy table for additional personnel)

|  |  |
| --- | --- |
| **Name:** |  |
| **Role/Position:** |  |
| **Degree(s):** |  |
| **Department:** |  |
| **Email:** |  |
| **Phone number:** |  |
| **Cell phone number:** |  |
| **Mailing Address:** |  |
| **Years of experience with species:** |  |
| **Years of experience with procedure(s):** |  |
| **If training is necessary, how will this be done, and who will do the training?**  |  |
| **Date most recent CITI training completed:** |  |
| **Date health risk assessment completed (if needed):** |  |

**Deletions:** Name and date effective (add lines as needed)

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1. **PROGRESS REPORT.** If the status of this project is 3.A. (active, project ongoing) or 3.B. (project was initiated, but is presently inactive), or 3.F. (completed), provide a brief update on the progress made in achieving the specific aims of the protocol.
2. **PROBLEMS/ADVERSE EVENTS.** If the status of this project is 3.A. (active, project ongoing) or 3.B. (project was initiated, but is presently inactive) or 3.F. (completed), describe any unanticipated adverse events, morbidity or mortality, the cause(s), if known, and how these problems were resolved. If NONE, this should be indicated.
3. **ALTERNATIVES TO ANIMAL USE.** Alternatives to the use of animals should be considered and used when possible. Since the last IACUC approval, have alternatives to the use of animals become available that could be substituted to achieve your specific project aims?
4. **ALTERNATIVES TO POTENTIALLY PAINFUL PROCEDURES.** (Address the following if your project involves USDA Category D or Category E) Procedures that cause the least amount of pain or distress to the animals should be considered and used when possible. Since the last IACUC approval, have alternatives which are potentially less painful or distressful become available that could be used to achieve your specific project aims?
5. **DUPLICATION.** Activities involving animals must not unnecessarily duplicate previous experiments. Provide written assurance that the activities of this project remain in compliance with the requirement that there must be no unnecessary duplication.
6. **FUTURE PLANS.**
	* No changes are planned and the project will continue as previously approved by the IACUC.
	* Changes are planned. Provide a full description and justification for the proposed changes. (This form is not a mechanism to request changes. If changes are needed, please obtain a copy of the IACUC Protocol Amendment Form).

[Please note that if the modifications are significant, you may be required to complete a new application. If you have questions or require assistance in making this determination, please contact the IACUC Office and/or the Attending Veterinarian]

* + Other. Provide a brief explanation.

**CERTIFICATION OF THE PRINCIPAL INVESTIGATOR.** Signature certifies that the Principal Investigator understands the requirements of the PHS Policy on Humane Care and Use of Laboratory Animals, applicable USDA regulations and the Institution's policies governing the use of vertebrate animals for research, testing, teaching or demonstration purposes. Signature further certifies that the investigator will continue to conduct the project in full compliance with the aforementioned requirements.

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| --- | --- |
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| Signature of the Principal Investigator | Date |

**ADDITIONAL INFORMATION ABOUT THIS FORM**

(This material may be deleted prior to submitting the form)

***INSTRUCTIONS***

Item 5--Progress Report. The progress in achieving the specific aims of the protocol should be described. The information in this section should be provided as an update to help the IACUC document the continued approvability of the research. For example, if 50 salamanders were used and the investigator had no progress to report, in light of the specific aims of the protocol, it would be reasonable for the IACUC to request clarification. It should, however, be recognized that scientific inquiry may involve "blind alleys", and failed experiments, thus resulting in little progress in the short- versus long-term.

Item 6--Problems/Adverse Events. Any unanticipated problems or adverse events that have occurred should be reported, as well as an explanation of how these events/problems were resolved. Depending on the information provided here, this response may also need to be factored into the IACUC's assessment of the ethical cost-benefit justification.

Item 7--Alternatives to Animal Use. This section raises the question of whether any viable alternatives to use of live animals have become available since the last IACUC review.

Item 8--Alternatives to Potentially Painful Procedures. This section asks whether there are any alternatives to USDA Category D or E procedures that are potentially less painful and could be used to achieve any of the specific aims of the research. The USDA Category D and E procedures are defined as follows. Animal activities in Category D involve "procedures that may cause more than momentary or slight pain or distress" for which appropriate sedatives, analgesics, or anesthetics will be administered (12,13). Category E is similarly defined, with the exception that sedatives, analgesics, or anesthetics cannot/will not be administered due to scientific considerations/requirements.

Item 9--Duplication. This section requests assurance that the animal activities do not unnecessarily duplicate previous experiments, as required by USDA regulations.

Item 10--Future Plans. The investigator is asked to indicate future plans for continuation of his/her project. This would include an indication as to whether the research would continue as originally approved; or conversely, if changes are planned, an outline, description, and brief justification of the proposed changes should be provided.

Finally, the investigator is asked to sign the Continuing Review Form, which contains a certification of his/her understanding and responsibility for conduct of animal activities in accordance with the PHS Policy, USDA regulations and the institution's (IACUC) policies. Signature here also attests to the accuracy of the investigator's responses. Requiring completion of this form, at least annually, indicates to the investigator the seriousness of the IACUC's review and the importance of investigator accountability for his/her research activity; for reporting it accurately; and for justifying continuance of the research project for another year. Accordingly, the IACUC, through its designated reviewer mechanism, is also held accountable for appropriate and responsible review of the IACUC protocol file, and for continuation approval of ongoing animal research, if it is still justified.

***REGULATORY REQUIREMENTS***

From http://grants.nih.gov/grants/olaw/references/contop96.htm

The PHS Policy at IV.C.5. states "the IACUC shall conduct continuing review of activities covered by this policy at appropriate intervals as determined by the IACUC but not less than once every three years". The USDA regulations 9 CFR 2.31(a)(5) (4) use similar language, except that continuing review must be performed not less than annually.

The OPRR has interpreted the PHS Policy provision for continuing review as a requirement for a "de novo" review (5-7). In this context, "de novo" means that the criteria and procedures for review of projects specified in IV.C. of the PHS Policy must be applied not less than once every three years. The IACUC must make the determination that the project conforms with the criteria at IV.C.1.a-g. of the PHS Policy. These criteria address such factors as pain and distress, pain relief, animal husbandry, veterinary care, personnel qualifications and methods of euthanasia. In addition to confirmation that projects are in compliance with the PHS Policy, the IACUC must also determine that the project is being conducted in a manner consistent with the "Guide for the Care and Use of Laboratory Animals" (Guide), unless departure is justified.

The preamble to the USDA regulations provides guidance on the USDA requirement for annual continuing review as follows: "We are adding a provision to the Final Rule to require that the Committee conduct continuing review of activities covered by the Animal Welfare Regulations at appropriate intervals, and at least annually [Final Rule 2.31(d)(5)]. This review...is intended to provide current information to the Research Facility regarding all ongoing activities so it can remain in compliance".

The USDA interprets the role and purpose of the annual continuing review as one form of monitoring the use of animals. Monitoring can be accomplished by the use of a standard form containing basic protocol information to be provided by the investigator (status of the project, assurance that activities are being conducted in accordance with the approved protocol, and proposed departures from the protocol in the upcoming year). It should be noted that the USDA regulations [9 CFR Part 2, Subpart C, 2.31(c)(7); 2.31(d)] and the PHS Policy [IV.C.1] require that proposed significant changes to the currently approved protocol be reviewed and approved by the IACUC prior to implementation.

**THE PURPOSE AND SUBSTANCE OF CONTINUING REVIEW**

On the basis of the aforementioned regulatory requirements and our collective interpretation, the purpose of continuing review appears to be threefold: to inform the IACUC of the current status of the project; to ensure continued compliance with PHS, USDA and institutional requirements; and to provide for re-evaluation of the animal activities at appropriate intervals. Federal requirements, research ethics, and moral obligations of the scientific community to society demand that IACUCs conduct appropriate and meaningful reviews of ongoing animal protocols in the same responsible manner that initial reviews are effected. This means that IACUCs should not "rubber stamp" a previously approved protocol during continuing review just because it has undergone a thorough initial review. In a society where use of animals in research, testing and teaching is viewed with increasing concern (9), high standards of oversight must be maintained. Within the framework of federal regulations and policies, however, there is need for institutions to develop review procedures that are reasonable, meaningful and efficient, and that do not burden IACUCs or investigators with unnecessary requirements that do not contribute directly to the welfare of the animals or provide significant information relevant to the role of the IACUCs.

**Current status of the project:** Information concerning the current status of the project should be provided by the investigator to the IACUC. Logically, this information would include funding status, number of animals used, and proposed amendments. In addition, some IACUCs may choose to ask the investigator to submit a brief report that will update the Committee on the progress being made on achieving the specific aims of the protocol. In general, however, progress reports or updates should not be used in the context of an assessment or evaluation unless there is an indication that the animal use is not consistent with good science.

**Compliance with PHS, USDA and institutional requirements:** The investigator should provide assurance that the animal activity has not deviated from the current IACUC approved protocol. Although it may generally be assumed that the initial review constituted a thorough and in depth assessment of the protocol for compliance with the requirements in place at the time, changes may have occurred in IACUC policies and procedures, the "state of the art", as well as in the PHS Policy and the USDA regulations. Therefore, protocols should be updated and reviewed, as necessary, to comply with the current standards.

**Ethical cost-benefit analysis:** Animal activities are most frequently justified from an ethical cost-benefit perspective. This means that any animal pain, morbidity and mortality must be outweighed or at least balanced, by the potential benefits of the project in terms of its relevance to human or animal health, advancement of knowledge or the good of society (10). Ethical cost-benefit assessment should be a major focus during initial and continuing review by the IACUC (10,11). This assessment should not, however, be misconstrued as the equivalent of an NIH study section review of scientific merit. Instead, it represents a threshold level of review which documents that the use of animals continues to be justified. Without such assessment, there is lack of accountability, which negates the purpose of continuing review, particularly for projects not funded by the PHS or other funding agencies with rigorous peer review.

The obvious question which arises is why an ethical cost-benefit relationship would change over time. After a protocol is initially approved by the IACUC it is possible that new information may have become available, which allows application of one of the "three Rs" (reduction, refinement, replacement). For example, new in vitro techniques or statistical methods may be discovered that could reduce the number of animals required. Or an investigator may find that a lesser degree of morbidity can be used as an experimental end point. Conversely, in some situations, it may be necessary for scientific reasons to increase the number of animals or to allow animals to reach a more advanced stage of morbidity than originally specified in the protocol. In either case, the ethical cost-benefit ratio will be altered and the IACUC should, therefore, re-evaluate this new relationship. Proposed changes in the protocol can be considered during continuing review and approved as warranted. Admittedly, there are considerations related to scientific continuity and grant requirements that may dictate whether changes in a protocol are possible. Nonetheless, it is incumbent on investigators and IACUCs alike to determine during continuing review whether the 3Rs can be applied further to the protocol.