**USDA Pain Levels:**

<table>
<thead>
<tr>
<th>USDA Category B</th>
<th>USDA Category C</th>
<th>USDA Category D</th>
<th>USDA Category E</th>
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<tbody>
<tr>
<td>Breeding or Holding Colony Protocols</td>
<td>No more than momentary or slight pain or distress and no use of pain-relieving drugs, or no pain or distress.</td>
<td>Pain or distress appropriately relieved with anesthetics, analgesics and/or tranquilizer drugs or other methods for relieving pain or distress.</td>
<td>Pain or distress or potential pain or distress that is <strong>not</strong> relieved with anesthetics, analgesics and/or tranquilizer drugs or other methods for relieving pain or distress.</td>
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**Examples**

**USDA Category B**
1. Holding or weighing animals in teaching or research activities.
2. Injections, blood collection or catheter implantation via superficial vessels.
3. Tattooing animals.
4. Ear punching of rodents.
5. Routine physical examinations.
6. Observation of animal behavior.
7. Feeding studies, which do not result in clinical health problems.
8. AVMA approved humane euthanasia procedures.
9. Routine agricultural husbandry procedures.
10. Live trapping.
11. Positive reward projects.

**Examples**
1. Diagnostic procedures such as laparoscopy or needle biopsies.
2. Non-survival surgical procedures.
4. Post operative pain or distress.
5. Ocular blood collection in mice.
6. Terminal cardiac blood collection.
7. Any post procedural outcome resulting in evident pain, discomfort or distress such as that associated with decreased appetite/activity level, adverse reactions, to touch, open skin lesions, abscesses, lameness, conjunctivitis, corneal edema and photophobia.
8. Exposure of blood vessels for catheter implantation.
9. Exsanguination under anesthesia.
10. Induced infections or antibody production with appropriate anesthesia and post-op/post-procedure analgesia when necessary.

**Examples**
1. Toxicological or microbiological testing, cancer research or infectious disease research that requires continuation until clinical symptoms are evident or death occurs.
2. Ocular or skin irritancy testing.
3. Food or water deprivation beyond that necessary for ordinary pre-surgical preparation.
4. Application of noxious stimuli such as electrical shock if the animal cannot avoid/escape the stimuli and/or it is severe enough to cause injury or more than momentary pain or distress.
5. Infliction of burns or trauma.
6. Prolonged restraint.
7. Any procedures for which needed analgesics, tranquilizers, sedatives, or anesthetics must be withheld for justifiable study purposes.
8. Use of paralyzing or immobilizing drugs for restraint.
9. Exposure to abnormal or extreme environmental conditions.
10. Psychotic-like behavior suggesting a painful or distressful status.
11. Euthanasia by procedures not approved by the AVMA.

(Note: there is no USDA Category A.)
Guidelines for determining USDA classification in protocols involving tissue collection before/after euthanasia and/or animal perfusion:

If an animal will be euthanatized by an approved physical or chemical method of euthanasia solely for the collection of tissues (after the animal's death), the procedure should be classified as USDA C.

If an animal will be anesthetized so that non-vital tissues can be collected (liver or skin biopsy), and the animal will then be allowed to recover, the procedure should be classified as USDA D (survival surgery).

If an animal will be anesthetized so that non-vital tissues can be collected (liver or skin biopsy, etc.); and the animal will then be euthanatized, the procedure should be classified as USDA D (non-survival surgery). In this scenario, it is necessary to justify why the animal couldn't be euthanatized (USDA category C) rather than anesthetized.

If an animal will be anesthetized so that vital tissues can be collected (heart, both kidneys or lungs, whole liver, etc.), the animal will obviously succumb to the procedure. To determine whether this will be euthanasia or non-survival surgery, we must consider the definition of euthanasia. A critical component of this definition is "rapid unconsciousness followed by loss of cardiac, respiratory and brain function". Based on this definition, procedures which require tissue manipulation or other prolonged techniques prior to the animals death (more than a few minutes) should be classified as non-survival surgery (USDA D). Similarly, if an animal will be anesthetized so that the tissue can be collected in the "freshest" possible state (i.e. heart) and the tissues will be rapidly excised, the procedure should be classified as euthanasia (USDA C). (Note: In this scenario, it is difficult to justify why the animal couldn't be euthanatized rather than anesthetized.)

If an animal will be anesthetized so that it can be chemically perfused, the same "test of time" applies (i.e.: long, technical manipulations should be classified as USDA D; while rapid intravascular injection of the perfusate without other manipulations should be classified as USDA C).

NOTE: Because the USDA classification system is based on the "potential for pain, distress or discomfort," the anesthetic/euthanasia drug dose becomes a critical concern. For example, if a known "euthanasia dose" of pentobarbital will be administered, drug irreversibility is assumed. Thus, once the animal is confirmed to be in an anesthetic plane (toe pinch response, etc.), tissues can be collected/procedures can be performed without the concern about what the animal will be perceiving. This procedure would then be classified as USDA C. The Committee recommends using a euthanizing dose whenever possible. Other methods may be appropriate with proper scientific justification.