IACUC Policy 18: Veterinary Administrative Approval for Significant Protocol Changes

Policy Intent: The intent of this policy is to describe the use of Veterinary Verification and Consultation or VVC at TTU.

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1. **Purpose**
a. Significant changes to a protocol must be approved either by a majority vote of a convened quorum of the IACUC (full committee review) or by designated member review. However, in the following specific circumstances (a-c below), administrative approval may be obtained by consultation with and approval of any Animal Care Services veterinarian.

2. **IACUC Policy**
a. It is the policy of the IACUC that the certain specific significant protocol changes (outlined in OLAW Guidance #NOT-OD-14-126 and further specified in this policy) may be approved by the Clinical or Attending Veterinarian, with proper consultation and review of the approved protocol (including appropriate amendments).

3. **Defined Changes**
   * See attached chart 1) What Changes Qualify for Which Reviews; 2) Significant Changes Process Flow
   a. Anesthesia, analgesia, or sedation. Please refer to the following documents:
      i. Policy 4 Analgesic Use
      ii. SOP020 Surgical Anesthesia
      iii. SOP061 Pain, Distress, Analgesia, and Anesthesia
      iv. [http://www.depts.ttu.edu/iacuc/Analgesics.php](http://www.depts.ttu.edu/iacuc/Analgesics.php)
   b. Euthanasia to any method approved in the AVMA Guidelines for the Euthanasia of Animals.
   c. Duration, frequency, type, or number of procedures to be performed on an animal as long as those procedures are either approved in the protocol or are approved TTU IACUC SOP’s.

4. **Veterinary Accountability**
a. The veterinarian is not conducting DMR but is serving as a subject matter expert to verify that compliance with the IACUC-reviewed and-approved policy is appropriate for the animals in this circumstance.
b. Consultation with the veterinarian will be documented by having the veterinarian send an email (or appropriate documentation) approving the change to the IACUC Chair/Coordinator. The PI will still submit an amendment form outlining the changes, but the amendment will not go through the review process.
   i. This email will be appended to the protocol for which the change is authorized
   ii. The protocol will be updated by the IACUC Chair/Coordinator staff
   iii. The IACUC chair/coordinate staff will forward a copy of the approved changes to the Post Approval Monitoring Coordinator
   iv. The **veterinarian may refer any request to the IACUC** for review for any reason and must refer any request that does not meet the parameters of the IACUC reviewed and approved policies and/or procedures.
5. **References**
   a. NIH Guide Notice NOT-OD-14-126
   b. OLAW Webpage Significant Changes
      i. [http://grants.nih.gov/grants/olaw/significant_changes.htm](http://grants.nih.gov/grants/olaw/significant_changes.htm)
   c. OLAW Special Seminars: Guidance on Significant Changes to Animal Activities: Recording, transcripts and resources
      i. [http://grants.nih.gov/grants/olaweducational_resources.htm#a_08212014](http://grants.nih.gov/grants/olaweducational_resources.htm#a_08212014)
   d. AVMA Euthanasia Guidelines –
      i. [https://www.avma.org/KB/Policies/Documents/euthanasia.pdf](https://www.avma.org/KB/Policies/Documents/euthanasia.pdf)
### What Changes Qualify for Which Reviews?

<table>
<thead>
<tr>
<th>FCR or DMR</th>
<th>WE*</th>
<th>Admin. Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>From nonsurvival to survival surgery</td>
<td>Anesthesia, <strong>analgesia, sedation</strong> or experimental substances</td>
<td>An increase in previously approved animal numbers*</td>
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<tr>
<td>Resulting in severe distress, or degree of invasiveness</td>
<td>Euthanasia to any method approved in the AVMA Guidelines for the Euthanasia of Animals</td>
<td>Correction of typographical errors</td>
</tr>
<tr>
<td>In housing and/or use of animals in a location that is not part of the animal program overseen by the IACUC</td>
<td>Duration, frequency, type, or number of procedures performed on an animal</td>
<td>Correction of grammar</td>
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<tr>
<td>In species</td>
<td></td>
<td></td>
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<tr>
<td>In study objectives</td>
<td></td>
<td>Contact Information updates</td>
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<tr>
<td>In Principal Investigator</td>
<td></td>
<td>Change in personnel, other than the Principal Investigator</td>
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<tr>
<td>That impact personnel safety</td>
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* IACUC-reviewed and approved policies (e.g., guidance documents, standard operating procedures, drug formularies) must be in place.

** Significant Changes

@ Adapted from Group 5, Train the Trainer Institute, October 2016
Significant Changes Process Flow

Does the request constitute a significant change to previously approved animal activities?

**NO**

Um... not sure why you are using this flowchart?
Proceed to happy hour....

**YES**

Does the request include a change in any of the following:
(a) anesthesia, analgesia, sedation, or experimental substances;
(b) euthanasia method consistent with AVMA Guidelines;
(c) duration, frequency, type, or number of procedures performed;
(d) increase in animal numbers

**NO**

Changes will go through FCR or DMR process

**YES**

Does IACUC have a written policy/SOP/formulary that covers the significant changes?

**NO**

An IACUC policy/SOP/formulary will need to be written before utilizing VVC

**YES**

Changes OK for VVC (a, b, c) by a(n) IACUC-designated veterinarian(s) or through administrative review (d)

**YES, but...**

... the change may contribute to greater pain, distress, or invasiveness, or may impact personnel safety...then it is not appropriate for WC review

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* Veterinarian may refer to IACUC for FCR or DMR

Adapted from Group B, August 2016 Train the Trainer Institute Module