

Unofficial comments submitted on behalf of the Office of the Chief Veterinary Medical Officer, Office of Research and Development, Department of Veterans Affairs.

1. It is our understanding that a number of comments have been submitted with regard to the stipulation in section C that “the IACUC is to be informed of changed handled by the IACUC staff”, because of concerns that this could be interpreted as requiring an additional formal report to the IACUC whenever a minor change is made. Our impression from a recent presentation by Dr. Brown is that this is not OLAW’s intention, but that OLAW merely wishes to make sure that the minor changes made by the IACUC staff are somehow trackable, and that the IACUC is aware of the minor changes made. To communicate this more clearly, we suggest revising the wording of the paragraph at the beginning of section C as follows:

“C. Changes that are not significant may be handled by the IACUC staff without IACUC review and approval. However, **any changes that have been handled by the IACUC staff are to be documented in the protocol file (e.g., with a copy of the changed section of the protocol, showing the tracked changes), to which the IACUC has ready access. Any such changes that were not initiated at the request of the IACUC are to be brought to the attention of the IACUC by being listed in the agenda for the following IACUC meeting.** ~~the IACUC is to be informed of changed handled by the IACUC staff. This information may be provided after the change has been reviewed and initiated.~~ Such minor changes include but are not limited to:”

This should make it easy for the IACUC to check back on any changes that have been made, while also relieving everyone of any added burden related to reporting completion of changes such as corrections of typos and grammatical errors in response to concerns that were raised in IACUC reviews in the first place.

2. We believe the wording of the third paragraph of the Proposed Guidance would be clearer as follows:

“The IACUC has discretion to add ~~to the following~~ **specific examples to those listed in Sections A- and B-, below**, or to establish a mechanism for determining significance on a case-by-case basis while remaining consistent with the **concepts addressed in A- and B.**”

3. In Section A, we suggest focusing on changes that have negative impacts on animal welfare, with guidance to give careful consideration to the determination of whether impacts are expected to be negative:

“A. Significant changes ~~are~~ **include** those changes that have or may have any direct **negative** impact on animal welfare. **It is the responsibility of the IACUC to establish a mechanism for assessing whether the impacts on animal welfare are or are not likely to be negative, as part of the determination of whether a proposed change is significant. Such significant changes including,** but **are** not limited to, changes:

- that have the potential to increase the level of pain or distress of the animal ~~and~~ **(these** includes all changes that involve anesthesia, analgesia, sedation, or euthanasia);
- in frequency, interval, type, number, or anatomical location, **that are expected to result in negative impacts on the animal welfare effects** of:

- procedures; ~~and~~ **or**
- substances delivered to the animal.”

4. Similarly, in Section B, it would be very helpful to make it explicit that decreases in animal numbers or reduction in scope (which actually don't require modification of an approved protocol anyway) are not considered “significant”:

“B. Some activities that may not have a direct impact on animal welfare are also significant. These include, but are not limited to, **the following changes**:

- **increases** in animal numbers (see Guide for the Care and Use of Laboratory Animals, p. 25) or **any change in** species;
- ~~to-house~~**ing** or **useing** animals in a location that is not **yet** part of the animal program overseen by the IACUC;
- **inclusion of work beyond** the scope of ~~an~~ **the** approved animal activity (see NIH Grants Policy Statement Part 2 8.1.2.5); and
- **any change** in Principal Investigator”