

## UGA FY2020

### Exceptions/Exemptions to the AWA Regulations

#### 1. Sec. 2.33 - Attending veterinarian and adequate veterinary care

The IACUC has approved an observation protocol of white-tailed deer which may not include a daily visual check of every deer. The protocol is as follows:

Daily, personnel inspect all deer in barn stalls, patrol outside pens to verify that deer are healthy, and inspect facilities for structural integrity and the safety of animals. Given the wild nature of white-tailed deer versus domestic livestock, it is not possible to visually inspect each deer to verify its presence during every inspection. Reading the ear tags of each deer is difficult as they move away from the observer. Personnel carefully move through pens to minimize stress to animals during inspections. Using binoculars and by encouraging deer through narrower areas of pens, personnel inspect deer daily for normal gait, behavior, and physical appearance. Quarterly, all animals are counted in each paddock. Deer that are sick will not move with the herd and often allow people to approach to closer distances. A quarterly report on the number of deer found sick or dead during the daily inspections as well as the totals from the quarterly counts is submitted to the IACUC for review.

All of the deer in the deer facility during this time were affected: 77

#### 2. Sec. 3.84 Cleaning, sanitization, housekeeping, and pest control

The IACUC has approved, for the Nonhuman Primate Core, a 15-day period between cage changes/sanitation in instances where adherence to the 14-day schedule is complicated due to the social pairing process or for experimental reasons. The animal care staff ensures that any cages that are excessively soiled are changed at 14 days.

All of the Nonhuman Primates housed in the NHP Core during this time were potentially affected: 141

#### 3. Sec. 3.128 – Space Requirements

For some specific infectious disease studies which require biocontainment housing, the IACUC has approved the short-term use of containment ferret caging that does not necessarily allow for fully upright posture of fully grown adults. The cages do allow for the ferrets to make normal postural adjustments and move about comfortably in the cage, and stretch up some, just not into a fully extended posture. These cages are utilized because they provide appropriate biocontainment for ferrets. The plastic caging allows for more light to enter the enclosures, allowing for better routine observation of the animals compared to the taller steel caging. The plastic from which this caging is constructed also weighs significantly less than the taller steel caging, minimizing occupational/ergonomic risk to husbandry personnel. Ferrets may be housed in this caging for up to two periods of 23 and 17 days (40 days in total) with at least 10 weeks between periods.

All ferrets that received sequential influenza infections during this time were potentially affected: 360

#### 4. Sec. 3.11 – Cleaning, sanitization, housekeeping, and pest control

15 DEC 2020



The IACUC approved an increased interval between cat cage sanitation, going beyond the standard two-week schedule for 1 infectious disease study. For 1 study that was ongoing at the time of the request, the interval extended to 2 weeks and 4 days, due to limited cage replacements and personnel safety when working with infected cats. Cages were spot cleaned daily to remove excrement, excess litter and debris. Enrichment items, food bowls and litter pans were maintained on the standard weekly or biweekly change-out schedule.

All cats that were housed under this study were affected: 16

#### **5. Secs. 3.11, 3.84 and 3.31 – Cleaning, sanitization, housekeeping, and pest control / Sanitation**

The IACUC has approved an exception to the standard bi-weekly cage change for animal species housed in the high-containment facility in cages larger than a multi cage IVC rack system (i.e. rodent, T2000 cages, etc.). The exception allows the interval to be extended to up to 4 weeks (28 days), although cages are changed as close as possible to the standard two weeks period. Such species would include NHPs, cats, some ferrets, and similar sized species. This was requested to ensure animal welfare while increasing human safety and enhancing facility operations. Cages continue to be thoroughly cleaned daily in order to reduce the infectious bio-load in the animal rooms. For some species, caging systems are cleaned in the morning and afternoon in order to prevent the accumulation of contamination. Also, the animal rooms are sanitized daily and enrichment is replaced and sent through cage wash at least weekly, for species that do not require daily or biweekly change-out. In most cases, cage change presents a stressful situation for the animals. Also, for some animals, infectious disease protocols requires that the animals be sedated for each cage change for safety reasons. Reducing the number of sedations during an experiment will increase animal welfare. This exception also increases human safety, because in most cases, cage change puts the animal care technician at more risk than normal daily cage cleaning. By reducing the number of cage changes in certain situations, the safety for technicians is enhanced. In addition, allowing a reduction in the frequency of moving heavy cage systems throughout the processes in the full cumbersome PPE required for high containment environments. Reducing the time spent in the containment zone reduces the risk of possible exposure to dangerous infectious agents.

Lastly, facility operations benefit from this exception as it is conducive to better compliance with federal regulatory agencies. In order to be able to work with multiple select agents in the vivarium at the same time, facility management developed a system that requires an Inner Corridor Access Control Program (ICAP) for each study that allows access to the inner corridor from the animal room only on scheduled time blocks. This cage change frequency exception drastically reduces requests for deviations to the ICAP program and the amount of time facility personnel spend in the Inner Corridor.

In approving the request, the IACUC asked that facility management provide data regarding the adequacy of daily inspection and hand cleaning of notably dirty areas – for example, comparing bacterial levels in the hand cleaned cages at 2 weeks vs. 4 weeks. The information is to be provided by Dec. 1, 2020.

Cats: 15

NHPs: 24

Skunks: 12

Raccoons: 16

Ferrets: 54

15 DEC 2020



## **6. Sec. 2.31 - Institutional Animal Care and Use Committee (IACUC)**

The IACUC has approved an exception to the regular scheduling and/or in-person conduction (vs. via electronic means) of certain activities as described in the Regulations, due to the impact of the COVID-19 pandemic. The IACUC has established a process for handling most activities. However, there are some activities that the IACUC cannot perform, or may not be able to perform, if a majority of IACUC members, or alternates, is not available.

A letter with a specific accounting of the potentially affected activities was submitted to APHIS on April 7, 2020.

## **7. Regulations covering daily operations of all species**

The IACUC has approved contingency plans for centralized animal facilities, in the event that staffing must be reduced to less than standard levels during the COVID-19 pandemic. Activities that may be affected in the event of staff reduction include sanitization schedules to less than those required by the Animal Welfare Regulations. Facility management submitted specific proposed changes, should the need for them arise, in order to preserve the sufficient care and welfare of the animals housed at the facilities. These plans will remain viable as long as the facilities are affected by the COVID-19 pandemic and aftermath. To date, this exception has only been used for limited periods of time.

1. For 3 weeks, dog runs were sanitized every 3 weeks, instead of the Animal Welfare Regulation requirement every 2 weeks. Runs were cleaned daily. This affected 52 dogs.
2. For 4 weeks, cat enclosures were sanitized every 8 weeks, and for the subsequent 4 weeks, they were sanitized every 6 weeks, instead of the Animal Welfare Regulation requirement every 2 weeks. Enclosures were spot cleaned daily. This affected 53 cats.

15 DEC 2020