

May 13, 2019

Dr. Mark Schmitt
Institutional Official and
Interim Vice President for Research
SUNY Upstate Medical University

The enclosed report summarizes the results of the semiannual program review and facility inspection conducted by the Institutional Animal Care and Use Committee (IACUC), in accordance with the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals (Policy), Section IV.B.1.-3., the *Guide for the Care and Use of Laboratory Animals (Guide)*, and the Animal Welfare Act (AWA) regulations, as applicable. Submission of semiannual reports to the Institutional Official is a condition of this University's Animal Welfare Assurance with the NIH Office of Laboratory Animal Welfare (OLAW).

#### **Program Review**

The program review is divided into three parts. Review was conducted at a regular IACUC meeting, as follows:

January 14, 2019 Part A – Institutional Policies and Responsibilities

IACUC Policies: Protocol Review & Facility Assessment

February 11, 2019 Part B – Veterinary Care

IACUC Policies: Anesthesia, Antibody Production/Neoplasia, Euthanasia, Misc., Restraint & Restriction, and Surgery

March 11, 2019 Part C – Personnel Training and Occupational Health & Safety

IACUC Policies: Personnel

#### **Facilities Inspection**

On April 8, 2019, members of the IACUC performed a Facilities Inspection. The following animal care & use areas were inspected:



The inspections were conducted using the *Guide*. Reasonable correction dates have been set for minor deficiencies noted during the current inspection.

#### Inspection & Post-approval Monitoring of Individual Labs/Core Facilities

A list of inspections to individual investigator's lab and core facilities conducted during the period November 2018 – April 2019 is included in this report. During these inspections, animal use areas were inspected and animal care and use protocols were reviewed using the *Guide*. Reasonable correction dates have been set for minor deficiencies noted during these site visits.

Please contact me if you have any questions regarding this report.

Respectfully submitted,

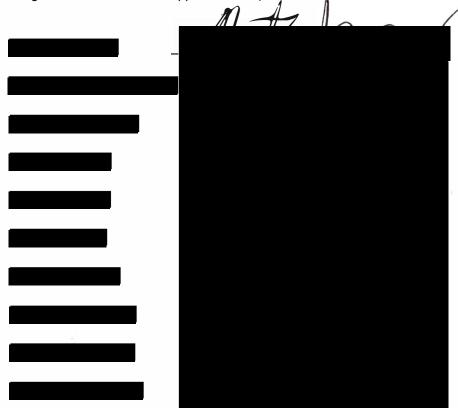
Dr. Michael Lyon

Chair, Institutional Animal Care and Use Committee

Phone: 464-7253

Email: lyonm@upstate.edu

The undersigned IACUC members approve this report for submission to the Institutional Official:



**Enclosure** 

SUNY Upstate Medical University
Institutional Animal Care and Use Committee
Semiannual Report to the Institutional Official
April 2019

# **Contents**

I.	Semiannual Program Review	2
	Part A - Institutional Policies and Responsibilities	2
	Part B - Veterinary Care	5
	Part C – Personnel Training and Occupational Health & Safety	8
II.	Semiannual Facility Inspection	10
	Guidance for Inspectors: What constitutes a thorough IACUC inspection?	10
	Part A - Animal Facility	16
	Part B - Animal Facility	18
	Part C - Animal Facility	20
	Part D – DLAR	21
Ш	. Report of Deficiencies and Corrective Action Schedule	22
IV	. Minority Comments	22
٧.	Inspections/Post-approval Monitoring	23
Er	ndnotes	64

# I. Semiannual Program Review i

# Part A - Institutional Policies and Responsibilities

# Key:

A = acceptable

**M** = minor deficiency

**S** = significant deficiency (is or may be a threat to animal health or safety)

**C** = change in program (PHS Policy <u>IV.A.1.a.-i.</u>) (include in semiannual report to IO and in annual report to OLAW)

**NA** = not applicable

[must] = indicates actions that the Committee for the Update of the Guide considers imperative and mandatory duty or requirement for providing human animal care and use (Guide, p.8)

1. Animal Care and Use Program	Α	M	S	С	NA
<ul> <li>Responsibility for animal well-being is assumed by all members of the program (Guide, p_1) [must]</li> </ul>	Х				
<ul> <li>IO has authority to allocate needed resources (Guide, p 13)</li> </ul>	X				
<ul> <li>Resources necessary to manage program of veterinary care are provided (Guide, p 14) [must]</li> </ul>	Х				
<ul> <li>Sufficient resources are available to manage the program, including training of personnel in accord with regulations and the Guide (Guide, pp. 11, 15)</li> </ul>	Х				
<ul> <li>Program needs are regularly communicated to IO by AV and/or IACUC (Guide, p 13)</li> </ul>	Х				
<ul> <li>Responsibilities for daily animal care and facility management are assigned to specific individual(s) when a full-time veterinarian is not available on site (Guide, p 14) [must]</li> </ul>					X
<ul> <li>Inter-institutional collaborations are described in formal written agreements (Guide, p 15)</li> </ul>	Х				
<ul> <li>Written agreements address responsibilities, animal ownership, and IACUC oversight (Guide, p 15)</li> </ul>	X				
2. Investigating & Reporting Animal Welfare Concerns	Α	M	S	С	NA
<ul> <li>Methods for investigating and reporting animal welfare concerns are established (Guide, p 23) [must]</li> </ul>	Х				
Reported concerns and corrective actions are documented (Guide, p 24)	Х				
<ul> <li>Mechanisms for reporting concerns are posted in facility and at applicable</li> </ul>	Х				
website with instructions ( <i>Guide</i> , p 24)					
<ul> <li>Includes multiple contacts (<i>Guide</i>, p 24)</li> <li>Includes anonymity, whistle blower policy, nondiscrimination and reprisal protection (<i>Guide</i>, p 24)</li> </ul>	X				
Disaster Planning and Emergency Preparedness	Α	М	S	С	NA
<ul> <li>Disaster plans for each facility to include satellite locations are in place (Guide, p 35, p 75) [must]</li> </ul>	Х				
Plans include provisions for euthanasia ( <i>Guide</i> , p 35) [must]	Х				
<ul> <li>Plans include triage plans to meet institutional and investigators' needs (Guide, p 35)</li> </ul>	Х				
<ul> <li>Plans define actions to prevent animal injury or death due to HVAC or other failures (Guide, p 35)</li> </ul>	Х				
<ul> <li>Plans describe preservation of critical or irreplaceable animals (Guide, p 35)</li> </ul>	X				
<ul> <li>Plans include essential personnel and their training (Guide, p 35)</li> </ul>	X				
<ul> <li>Animal facility plans are approved by the institution and incorporated into overall response plan (Guide, p 35)</li> </ul>	Х				
<ul> <li>Law enforcement and emergency personnel are provided a copy and integration with overall plan is in place (Guide, p 35)</li> </ul>	Х				
4. IACUC	Α	M	S	С	NA
<ul> <li>Meets as necessary to fulfill responsibilities (Guide, p 25) [must]</li> </ul>	X				
<ul> <li>IACUC Members named in protocols or with conflicts recuse themselves from protocol decisions (Guide, p 26) [must]</li> </ul>	X				
<ul> <li>Continuing IACUC oversight after initial protocol approval is in place (Guide, p 33)</li> </ul>	X				
<ul> <li>IACUC evaluates the effectiveness of training programs (Guide, p 15)</li> </ul>	X				

5. IACUC Protocol Review - Special Considerations	A	M	S	С	NA
<ul> <li>Humane endpoints are established for studies that invinfectious diseases, vaccine challenge, pain modeling monoclonal antibodies, assessment of toxicologic effective, and models of cardiovascular shock (Guide, p.</li> </ul>	g, trauma, production of ects, organ or system				
<ul> <li>For pilot studies, a system to communicate with the IA (Guide, p 28)</li> </ul>	ACUC is in place X				
<ul> <li>For genetically modified animals, enhanced monitorin place (Guide, p 28)</li> </ul>	g and reporting is in X				
<ul> <li>Restraint devices, when necessary, are justified in the (Guide, p 29) [must]</li> </ul>	e animal use protocols X				
Alternatives to physical restraint are considered (Guident)	de, <u>p 29</u> ) X				
Period of restraint is the minimum to meet scientific of	bjectives ( <i>Guide</i> , <u>p 29</u> ) X				
Training of animals to adapt to restraint is provided (0)	Guide, p 29) X				
Animals that fail to adapt are removed from study (Gu	<i>iide</i> , <u>p 29</u> ) X				
<ul> <li>Appropriate observation intervals of restrained anima 29)</li> </ul>	ls are provided ( <i>Guide</i> , <u>p</u> X				
<ul> <li>Veterinary care is provided if lesions or illness result f</li> <li>30) [must]</li> </ul>	rom restraint ( <i>Guide</i> , <u>p</u> X				
<ul> <li>Explanations of purpose and duration of restraint are personnel (Guide, p 30)</li> </ul>	provided to study X				
<ul> <li>Multiple surgical procedures on a single animal are ju evaluated (Guide, p 30)</li> </ul>	stified and outcomes X				
<ul> <li>Major versus minor surgical procedures are evaluated basis (Guide, p 30)</li> </ul>	d on a case-by-case				
<ul> <li>Multiple survival procedure justifications in non-regular regulated species standards (Guide, p 30)</li> </ul>	ated species conform to X				
<ul> <li>Animals on food/fluid restriction are monitored to ensumet (Guide, p 31)</li> </ul>	ure nutritional needs are				
<ul> <li>Body weights for food/fluid restricted animals are reco (Guide, p 31)</li> </ul>	orded at least weekly X				
<ul> <li>Daily written records are maintained for food/fluid rest</li> <li>(Guide, p 31)</li> </ul>	tricted animals X				
Pharmaceutical grade chemicals are used, when avail procedures ( <i>Guide</i> , p 31)	ilable, for animal-related X				
<ul> <li>Non-pharmaceutical grade chemicals are described, j IACUC (Guide, p 31)</li> </ul>	ustified, and approved by X				
<ul> <li>Investigators conducting field studies know zoonotic claws and regulations applicable in study area (Guide,</li> </ul>					Х
<ul> <li>Disposition plans are considered for species removed 32)</li> </ul>	from the wild (Guide, p				Х
<ul> <li>Toe-clipping only used when no alternative, performe pain relief (Guide, p 75)</li> </ul>	d aseptically and with				
IACUC Membership and Functions	A	М	S	С	N/
<ul> <li>IACUC is comprised of at least 5 members, appointed IV.A.3.)</li> </ul>	d by CEO (PHS Policy,				
<ul> <li>Members include a veterinarian, a scientist, a nonscientist, a no</li></ul>	entist, and a nonaffiliated X				
<ul> <li>IACUC authority and resources for oversight and eva program are provided (Guide, p 14)</li> </ul>	luation of institution's X				
<ul> <li>IACUC conducts semiannual evaluations of institution program (PHS Policy, IV.B.)</li> </ul>	nal animal care and use				
Conducts semiannual inspections of institutional anim IV.B.)	nal facilities (PHS Policy,				
IACUC organizationally reports to the Institutional Off	icial (PHS Policy,				

<ul> <li>Methods for (Guide, p 23</li> </ul>	reporting and investigating animal welfare concerns are in place [must]	Х				
<ul> <li>Reviews and (PHS Policy,</li> </ul>	investigates concerns about animal care and use at institution iii IV.B.)	Х				
	are in place for review, approval, and suspension of animal HS Policy, <u>IV.B.</u> )	Х				
approved ac	are in place for review and approval of significant changes to tivities (PHS Policy, IV.B.)	Х				
restraint, mu	n place for special procedures (e.g., genetically modified animals, ltiple survival surgery, food and fluid regulation, field s, agricultural animals) ( <i>Guide</i> , p 27-32)	Х				
	exemptions from major survival surgical procedure restrictions USDA/APHIS (Guide, p. 32) [must]					Х
	and Reporting Requirements <sup>vi</sup>	Α	M	S	С	NA
<ul> <li>Semiannual</li> </ul>	report to the IO (PHS Policy, <u>IV.B.</u> )					
<ul> <li>Submitte</li> </ul>	ed to IO every 6 months	Х				
	s program review and facility inspection(s) results (includes all and facility deficiencies)	Х				
	minority IACUC views	X				
	es IACUC-approved departures from the <i>Guide</i> or PHS Policy and ons for each departure vii	Χ				
	ishes significant from minor deficiencies	Х				
<ul> <li>Includes identifie</li> </ul>	a plan and schedule for correction for each deficiency	X				
	LAW (PHS Policy, IV.F.)					
	report to OLAW documents program changes, dates of the dual program reviews and facility inspections and includes any views	Х				
o Promptl Policy n	y advises OLAW of serious/ongoing <i>Guide</i> deviations or PHS oncompliance (NOT-OD-05-034)	Х				
activity I	must promptly advise OLAW of any suspension of an animal by the IACUC (NOT-OD-05-034)	X				
	.S. Department of Agriculture (USDA) or Federal funding agency <sup>ix</sup>					
exception	report to USDA contains required information including all ins/exemptions	Х				
exception	g mechanism to USDA is in place for IACUC-approved ins to the regulations and standards	Х				
correction	are filed within 15 days for failures to adhere to timetable for on of significant deficiencies	Х				
Federal	reports suspensions of activities by the IACUC to USDA and any funding agency	Χ				
Records (PF	S Policy, <u>IV.E.</u> )		1			1
for 3 year		Х				
informat		Х				
<ul> <li>Records</li> </ul>	of IACUC reviews are maintained for 3 years after the completion udy.	Χ				

# I. Semiannual Program Review Part B - Veterinary Care

A = acceptable

**M** = minor deficiency

S = significant deficiency (is or may be a threat to animal health or safety)
C = change in program (PHS Policy IV.A.1.a.-i.) (include in semiannual report to IO and in annual report to OLAW)

**NA** = not applicable

[must] = indicates actions that the Committee for the Update of the Guide considers imperative and mandatory duty or requirement for providing human animal care and use (Guide, p.8)

	or requirement for providing human animal care and use (Guide, p.8)					
1.	Veterinary Care	Α	M	S	С	NA
	<ul> <li>An arrangement for veterinarian(s) with training or experience in lab animal medicine is in place including backup veterinary care<sup>xi</sup></li> </ul>	Х				
	<ul> <li>Veterinary access to all animals is provided (Guide, p 14) [must]</li> </ul>	Х				
	<ul> <li>Direct or delegated authority is given to the veterinarian to oversee all aspects of animal care and use (Guide, p 14) [must]</li> </ul>	Х				
	<ul> <li>Veterinarian provides consultation when pain and distress exceeds anticipated level in protocol (Guide, p 5) [must]</li> </ul>	Х				
	<ul> <li>Veterinarian provides consultation when interventional control is not possible (Guide, p 5) [must]</li> </ul>	Х				
	<ul> <li>If part-time/consulting veterinarian, visits meet programmatic needs (Guide, p 14)</li> </ul>					Х
	• Regular communication occurs between veterinarian and IACUC ( <i>Guide</i> , <u>p 14</u> )	X				
	<ul> <li>Veterinarian(s) have experience and training in species used (Guide, p 15) [must]</li> </ul>	X				
	<ul> <li>Veterinarian(s) have experience in facility administration/management (Guide, p 15)</li> </ul>	Х				
2.	Clinical Care and Management	Α	M	S	С	NA
	<ul> <li>Veterinary program offers high quality of care and ethical standards (Guide, p 105) [must]</li> </ul>	X				
	<ul> <li>Veterinarian provides guidance to all personnel to ensure appropriate husbandry, handling, treatment, anesthesia, analgesia, and euthanasia (Guide, p 106)</li> </ul>	X				
	<ul> <li>Veterinarian provides oversight to surgery and perioperative care (Guide, p 106)</li> </ul>	Х				
	<ul> <li>Veterinary care program is appropriate for program requirements (Guide, pp. 113-114)</li> </ul>	X				
	<ul> <li>Veterinarian(s) is familiar with species and use of animals and has access to medical and experimental treatment records (Guide, p 114)</li> </ul>	X				
	<ul> <li>Procedures to triage and prioritize incident reports are in place (Guide, p 114)</li> </ul>	X				
	Procedures are in place to address:					
	<ul> <li>Problems with experiments to determine course of treatment in consultation with investigator (<i>Guide</i>, <u>p 114</u>)</li> </ul>	X				
	<ul> <li>Recurrent or significant health problems with the IACUC and documentation of treatments and outcomes (<i>Guide</i>, p 114)</li> </ul>	Х				
	<ul> <li>Veterinary review and oversight of medical and animal use records (Guide, p 115)</li> </ul>	X				
	<ul> <li>Procedures established for timely reporting of animal injury, illness, or disease (Guide, p 114) [must]</li> </ul>	Х				
	<ul> <li>Procedures established for veterinary assessment, treatment, or euthanasia (Guide, p 114) [must]</li> </ul>	Х				
	<ul> <li>Veterinarian is authorized to treat, relieve pain, and/or euthanize (Guide, p 114 [must]</li> </ul>	X				
3.	Animal Procurement and Transportation/Preventive Medicine	A	M	S	С	NA
	Procedures for lawful animal procurement are in place ( <i>Guide</i> , <u>p 106</u> ) [must]	X				
	Sufficient facilities and expertise are confirmed prior to procurement ( <i>Guide</i> , <u>p 106</u> )	X				
	<ul> <li>Procurement is linked to IACUC review and approval (Guide, p 106)</li> </ul>	Χ				
	<ul> <li>Random source dogs and cats are inspected for identification (Guide, p 106)</li> </ul>					X

Surgical outcomes are assessed and corrective changes instituted (Guide, p 115)     Researchers have appropriate training to ensure good technique (Guide, p 115) [must]     Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (Guide, p 116)     Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (Guide, p 116)     Surgical procedures including laparoscopic procedures are categorized as	S C	X
Animal vendors are evaluated to meet program needs and quality ( <i>Guide</i> , p. 106)  Breeding colonies are based on need and managed to minimize numbers ( <i>Guide</i> , p. 107)  Procedures for compliance with animal transportation regulations, including international requirements, are in place ( <i>Guide</i> , p. 107) [must]  Transportation is planned to ensure safety, security and minimize risk ( <i>Guide</i> , p. 107)  Movement of animals is planned to minimize transit time and deliveries are planned to ensure receiving personnel are available ( <i>Guide</i> , pp. 107-108)  Appropriate loading and unloading facilities are available ( <i>Guide</i> , p. 109)  Policies in place on separation by species, source, and health status ( <i>Guide</i> , p. 110-111)  Procedures in place for quarantine to include zoonoses prevention ( <i>Guide</i> , p. 110-111)  Procedures in place for stabilization/acclimation ( <i>Guide</i> , pp. 110-111)  Program is in place for stabilization/acclimation ( <i>Guide</i> , pp. 110-111)  Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation ( <i>Guide</i> , p. 112)  Diagnostic resources are available for preventive health program ( <i>Guide</i> , p. 112)  Surgical procedures have appropriate training to ensure good technique ( <i>Guide</i> , p. 115)  Researchers have appropriate training to ensure good technique ( <i>Guide</i> , p. 115) [must]  Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) ( <i>Guide</i> , p. 116)  Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved ( <i>Guide</i> , p. 116)  Surgical procedures including laparoscopic procedures are categorized as	S C	
<ul> <li>Animal vendors are evaluated to meet program needs and quality (<i>Guide</i>, p. 106)</li> <li>Breeding colonies are based on need and managed to minimize numbers (<i>Guide</i>, p.107)</li> <li>Procedures for compliance with animal transportation regulations, including international requirements, are in place (<i>Guide</i>, p.107) [<i>must</i>]</li> <li>Transportation is planned to ensure safety, security and minimize risk (<i>Guide</i>, p.107)</li> <li>Movement of animals is planned to minimize transit time and deliveries are planned to ensure receiving personnel are available (<i>Guide</i>, pp. 107-108)</li> <li>Appropriate loading and unloading facilities are available (<i>Guide</i>, p. 109)</li> <li>Environment at receiving site is appropriate (<i>Guide</i>, p. 109)</li> <li>Policies in place on separation by species, source, and health status (<i>Guide</i>, pp. 109, 111-112)</li> <li>Procedures in place for quarantine to include zoonoses prevention (<i>Guide</i>, p. 110)</li> <li>Quarantined animals from different shipments are handled separately or physically separated (<i>Guide</i>, p. 110)</li> <li>Procedures in place for stabilization/acclimation (<i>Guide</i>, pp. 110-111)</li> <li>Policies in place for stabilization/acclimation (<i>Guide</i>, pp. 110-111)</li> <li>Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation (<i>Guide</i>, p. 112)</li> <li>Diagnostic resources are available for preventive health program (<i>Guide</i>, p. 112)</li> <li>Diagnostic resources are available for preventive canges instituted (<i>Guide</i>, p. 115)</li> <li>Researchers have appropriate training to ensure good technique (<i>Guide</i>, p. 115)</li> <li>Researchers have appropriate training to ensure good technique (<i>Guide</i>, p. 115)</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (<i>Guide</i>, p. 116)</li> <li>Aseptic surgery is conducted in dedicated f</li></ul>	S C	
(Guide, p_107)  Procedures for compliance with animal transportation regulations, including international requirements, are in place (Guide, p_107) [must]  Transportation is planned to ensure safety, security and minimize risk (Guide, p_107)  Movement of animals is planned to minimize transit time and deliveries are planned to ensure receiving personnel are available (Guide, pp. 107-108)  Appropriate loading and unloading facilities are available (Guide, p_109)  Environment at receiving site is appropriate (Guide, p_109)  Policies in place on separation by species, source, and health status (Guide, pp. 109, 111-112)  Procedures in place for quarantine to include zoonoses prevention (Guide, p_110)  Quarantined animals from different shipments are handled separately or physically separated (Guide, p_110)  Procedures in place for stabilization/acclimation (Guide, pp. 110-111)  Procedures in place for stabilization/acclimation (Guide, pp. 112)  Program is in place for stabilization/acclimation (Guide, pp. 112)  Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation (Guide, p_112)  Diagnostic resources are available for preventive health program (Guide, p_112)  Surgery  A M  Surgery  A M  Surgical outcomes are assessed and corrective changes instituted (Guide, p_115)  Researchers have appropriate training to ensure good technique (Guide, p_115)  Researchers have appropriate training to ensure good technique (Guide, p_115)  Researchers have appropriate training to ensure good technique (Guide, p_115)  Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (Guide, p_116)  Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (Guide, p_116)	S C	
Procedures for compliance with animal transportation regulations, including international requirements, are in place ( <i>Guide</i> , p. 107) [must]  Transportation is planned to ensure safety, security and minimize risk ( <i>Guide</i> , p. 107)  Movement of animals is planned to minimize transit time and deliveries are planned to ensure receiving personnel are available ( <i>Guide</i> , pp. 107-108)  Appropriate loading and unloading facilities are available ( <i>Guide</i> , pp. 109)  Environment at receiving site is appropriate ( <i>Guide</i> , p. 109)  Policies in place on separation by species, source, and health status ( <i>Guide</i> , pp. 109, 111-112)  Procedures in place for quarantine to include zoonoses prevention ( <i>Guide</i> , p. 110)  Quarantined animals from different shipments are handled separately or physically separated ( <i>Guide</i> , p. 110)  Policies in place for stabilization/acclimation ( <i>Guide</i> , pp. 110-111)  Policies in place for stabilization/acclimation ( <i>Guide</i> , pp. 110-111)  Procedures in place for surveillance, diagnosis, treatment and control of disease to include daily observation ( <i>Guide</i> , p. 112)  Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation ( <i>Guide</i> , p. 112)  Diagnostic resources are available for preventive health program ( <i>Guide</i> , p. 112)  Surgical outcomes are assessed and corrective changes instituted ( <i>Guide</i> , p. 115)  Researchers have appropriate training to ensure good technique ( <i>Guide</i> , p. 115) [must]  Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) ( <i>Guide</i> , p. 116)  Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved ( <i>Guide</i> , p. 116)  Surgical procedures including laparoscopic procedures are categorized as	S C	
<ul> <li>Transportation is planned to ensure safety, security and minimize risk (<i>Guide</i>, p. 107)</li> <li>Movement of animals is planned to minimize transit time and deliveries are planned to ensure receiving personnel are available (<i>Guide</i>, pp. 107-108)</li> <li>Appropriate loading and unloading facilities are available (<i>Guide</i>, p. 109)</li> <li>Environment at receiving site is appropriate (<i>Guide</i>, p. 109)</li> <li>Policies in place on separation by species, source, and health status (<i>Guide</i>, pp. 109, 111-112)</li> <li>Procedures in place for quarantine to include zoonoses prevention (<i>Guide</i>, p. 110)</li> <li>Quarantined animals from different shipments are handled separately or physically separated (<i>Guide</i>, p. 110)</li> <li>Procedures in place for stabilization/acclimation (<i>Guide</i>, pp. 110-111)</li> <li>Procedures in place for stabilization/acclimation (<i>Guide</i>, p. 112)</li> <li>Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation (<i>Guide</i>, p. 112)</li> <li>Diagnostic resources are available for preventive health program (<i>Guide</i>, p. 112)</li> <li>Surgery</li> <li>Surgical outcomes are assessed and corrective changes instituted (<i>Guide</i>, p. 115)</li> <li>Researchers have appropriate training to ensure good technique (<i>Guide</i>, p. 115) [<i>must</i>]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (<i>Guide</i>, p. 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (<i>Guide</i>, p. 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul>	S C	
<ul> <li>Movement of animals is planned to minimize transit time and deliveries are planned to ensure receiving personnel are available (<i>Guide</i>, pp. 107-108)</li> <li>Appropriate loading and unloading facilities are available (<i>Guide</i>, p 109)</li> <li>Environment at receiving site is appropriate (<i>Guide</i>, p 109)</li> <li>Policies in place on separation by species, source, and health status (<i>Guide</i>, pp. 109, 111-112)</li> <li>Procedures in place for quarantine to include zoonoses prevention (<i>Guide</i>, p 110)</li> <li>Quarantined animals from different shipments are handled separately or physically separated (<i>Guide</i>, p 110)</li> <li>Procedures in place for stabilization/acclimation (<i>Guide</i>, pp. 110-111)</li> <li>Procedures in place for stabilization/acclimation (<i>Guide</i>, p 112)</li> <li>Policies in place for surveillance, diagnosis, treatment and control of disease to include daily observation (<i>Guide</i>, p 112)</li> <li>Diagnostic resources are available for preventive health program (<i>Guide</i>, p 112)</li> <li>Surgery</li> <li>A M</li> <li>Surgical outcomes are assessed and corrective changes instituted (<i>Guide</i>, p 115)</li> <li>Researchers have appropriate training to ensure good technique (<i>Guide</i>, p 115) [<i>must</i>]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (<i>Guide</i>, p 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (<i>Guide</i>, p 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul>	S C	
<ul> <li>Appropriate loading and unloading facilities are available (<i>Guide</i>, p.109)</li> <li>Environment at receiving site is appropriate (<i>Guide</i>, p.109)</li> <li>Policies in place on separation by species, source, and health status (<i>Guide</i>, pp. 109, 111-112)</li> <li>Procedures in place for quarantine to include zoonoses prevention (<i>Guide</i>, p.110)</li> <li>Quarantined animals from different shipments are handled separately or physically separated (<i>Guide</i>, p.110)</li> <li>Procedures in place for stabilization/acclimation (<i>Guide</i>, pp. 110-111)</li> <li>Policies in place for stabilization/acclimation (<i>Guide</i>, p. 112)</li> <li>Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation (<i>Guide</i>, p.112)</li> <li>Diagnostic resources are available for preventive health program (<i>Guide</i>, p. 112)</li> <li>Surgery</li> <li>Surgical outcomes are assessed and corrective changes instituted (<i>Guide</i>, p. 115) [<i>must</i>]</li> <li>Researchers have appropriate training to ensure good technique (<i>Guide</i>, p. 115) [<i>must</i>]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (<i>Guide</i>, p. 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (<i>Guide</i>, p. 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul>	S C	
<ul> <li>Environment at receiving site is appropriate (<i>Guide</i>, p.109)</li> <li>Policies in place on separation by species, source, and health status (<i>Guide</i>, pp. 109, 111-112)</li> <li>Procedures in place for quarantine to include zoonoses prevention (<i>Guide</i>, p.110)</li> <li>Quarantined animals from different shipments are handled separately or physically separated (<i>Guide</i>, p.110)</li> <li>Procedures in place for stabilization/acclimation (<i>Guide</i>, pp. 110-111)</li> <li>Procedures in place for stabilization/acclimation (<i>Guide</i>, pp. 110-111)</li> <li>Policies in place for surveillance, diagnosis, treatment and control of disease to include daily observation (<i>Guide</i>, p.112)</li> <li>Piagnostic resources are available for preventive health program (<i>Guide</i>, p. 112)</li> <li>Surgery</li> <li>Surgical outcomes are assessed and corrective changes instituted (<i>Guide</i>, p. 115) [<i>must</i>]</li> <li>Researchers have appropriate training to ensure good technique (<i>Guide</i>, p. 115) [<i>must</i>]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (<i>Guide</i>, p. 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (<i>Guide</i>, p. 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul>	S C	
<ul> <li>Policies in place on separation by species, source, and health status (<i>Guide</i>, pp. 109, 111-112)</li> <li>Procedures in place for quarantine to include zoonoses prevention (<i>Guide</i>, p. 110)</li> <li>Quarantined animals from different shipments are handled separately or physically separated (<i>Guide</i>, p. 110)</li> <li>Procedures in place for stabilization/acclimation (<i>Guide</i>, pp. 110-111)</li> <li>Policies in place for isolation of sick animals (<i>Guide</i>, p. 112)</li> <li>Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation (<i>Guide</i>, p. 112)</li> <li>Diagnostic resources are available for preventive health program (<i>Guide</i>, p. 112)</li> <li>Surgery</li> <li>Surgical outcomes are assessed and corrective changes instituted (<i>Guide</i>, p. 115)</li> <li>Researchers have appropriate training to ensure good technique (<i>Guide</i>, p. 115) [<i>must</i>]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (<i>Guide</i>, p. 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (<i>Guide</i>, p. 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul>	S C	
<ul> <li>(Guide, pp. 109, 111-112)</li> <li>Procedures in place for quarantine to include zoonoses prevention         (Guide, p 110)</li> <li>Quarantined animals from different shipments are handled separately or physically separated (Guide, p 110)</li> <li>Procedures in place for stabilization/acclimation (Guide, pp. 110-111)</li> <li>Policies in place for isolation of sick animals (Guide, p 112)</li> <li>Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation (Guide, p 112)</li> <li>Diagnostic resources are available for preventive health program (Guide, p 112)</li> <li>Surgery</li> <li>Surgical outcomes are assessed and corrective changes instituted (Guide, p 115) [must]</li> <li>Researchers have appropriate training to ensure good technique (Guide, p 115) [must]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (Guide, p 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (Guide, p 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul>	S C	
<ul> <li>(Guide, p 110)</li> <li>Quarantined animals from different shipments are handled separately or physically separated (Guide, p 110)</li> <li>Procedures in place for stabilization/acclimation (Guide, pp. 110-111)</li> <li>Policies in place for isolation of sick animals (Guide, p 112)</li> <li>Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation (Guide, p 112)</li> <li>Diagnostic resources are available for preventive health program (Guide, p 112)</li> <li>Surgery</li> <li>Surgical outcomes are assessed and corrective changes instituted (Guide, p 115)</li> <li>Researchers have appropriate training to ensure good technique (Guide, p 115) [must]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (Guide, p 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (Guide, p 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul>	s c	
physically separated ( <i>Guide</i> , p.110)  Procedures in place for stabilization/acclimation ( <i>Guide</i> , pp. 110-111)  Policies in place for isolation of sick animals ( <i>Guide</i> , p.112)  Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation ( <i>Guide</i> , p.112)  Diagnostic resources are available for preventive health program ( <i>Guide</i> , p.112)  Surgery  Surgical outcomes are assessed and corrective changes instituted ( <i>Guide</i> , p.115)  Researchers have appropriate training to ensure good technique ( <i>Guide</i> , p.115) [ <i>must</i> ]  Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) ( <i>Guide</i> , p.116)  Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved ( <i>Guide</i> , p.116)  Surgical procedures including laparoscopic procedures are categorized as	s c	
<ul> <li>Policies in place for isolation of sick animals (<i>Guide</i>, p 112)</li> <li>Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation (<i>Guide</i>, p 112)</li> <li>Diagnostic resources are available for preventive health program (<i>Guide</i>, p 112)</li> <li>Surgery</li> <li>Surgical outcomes are assessed and corrective changes instituted (<i>Guide</i>, p 115)</li> <li>Researchers have appropriate training to ensure good technique (<i>Guide</i>, p 115) [<i>must</i>]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (<i>Guide</i>, p 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (<i>Guide</i>, p 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul>	s c	
<ul> <li>Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation (<i>Guide</i>, p. 112)</li> <li>Diagnostic resources are available for preventive health program (<i>Guide</i>, p. 112)</li> <li>Surgery         <ul> <li>Surgical outcomes are assessed and corrective changes instituted (<i>Guide</i>, p. 115)</li> <li>Researchers have appropriate training to ensure good technique (<i>Guide</i>, p. 115) [<i>must</i>]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (<i>Guide</i>, p. 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (<i>Guide</i>, p. 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul> </li> </ul>	s c	
<ul> <li>Program is in place for surveillance, diagnosis, treatment and control of disease to include daily observation (<i>Guide</i>, p 112)</li> <li>Diagnostic resources are available for preventive health program (<i>Guide</i>, p 112)</li> <li>Surgery</li> <li>Surgical outcomes are assessed and corrective changes instituted (<i>Guide</i>, p 115)</li> <li>Researchers have appropriate training to ensure good technique (<i>Guide</i>, p 115) [<i>must</i>]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (<i>Guide</i>, p 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (<i>Guide</i>, p 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul>	s c	
<ul> <li>Diagnostic resources are available for preventive health program (<i>Guide</i>, p. 112)</li> <li>Surgery</li> <li>Surgical outcomes are assessed and corrective changes instituted (<i>Guide</i>, p. 115)</li> <li>Researchers have appropriate training to ensure good technique (<i>Guide</i>, p. 115) [<i>must</i>]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (<i>Guide</i>, p. 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (<i>Guide</i>, p. 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul>	s c	
Surgical outcomes are assessed and corrective changes instituted     (Guide, p 115)     Researchers have appropriate training to ensure good technique (Guide, p 115) [must]     Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (Guide, p 116)     Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (Guide, p 116)     Surgical procedures including laparoscopic procedures are categorized as	s c	
<ul> <li>(Guide, p 115)</li> <li>Researchers have appropriate training to ensure good technique (Guide, p 115) [must]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (Guide, p 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (Guide, p 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul>		NA
<ul> <li>115) [must]</li> <li>Pre-surgical plans are developed and include veterinary input (e.g., location, supplies, anesthetic and analgesic use, peri-operative care, recordkeeping)         (Guide, p 116)</li> <li>Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (Guide, p 116)</li> <li>Surgical procedures including laparoscopic procedures are categorized as</li> </ul>		
supplies, anesthetic and analgesic use, peri-operative care, recordkeeping) (Guide, p 116)  • Aseptic surgery is conducted in dedicated facilities or spaces, unless exception justified and IACUC approved (Guide, p 116)  • Surgical procedures including laparoscopic procedures are categorized as		
exception justified and IACUC approved ( <i>Guide</i> , p.116)  Surgical procedures including laparoscopic procedures are categorized as		
major or minor ( <i>Guide</i> , pp. 117-118)		
<ul> <li>For nonsurvival surgery, the site is clipped, gloves are worn and instruments and area are clean (<i>Guide</i>, p 118)</li> </ul>		
Aseptic technique is followed for survival surgical procedures     (Guide, pp. 118-119)  X		
<ul> <li>Effective procedures for sterilizing instruments and monitoring expiration dates on sterile packs are in place (Guide, p 119)</li> </ul>		
<ul> <li>Procedures for monitoring surgical anesthesia and analgesia are in place (Guide, p 119)</li> </ul>		
<ul> <li>For aquatic species, skin surfaces are kept moist during surgical procedures (Guide, p 119)</li> </ul>		
<ul> <li>Post-operative monitoring and care are provided by trained personnel and documented (e.g., thermoregulation, physiologic function, analgesia, infection, removal of skin closures) (<i>Guide</i>, pp. 119-120)</li> </ul>		
F. D. C. District Association of Association	s c	NA
<ul> <li>Guidelines for assessment and categorization of pain, distress and animal wellbeing are provided during training (<i>Guide</i>, p 121)</li> </ul>		
<ul> <li>Selection of analgesics and anesthetics is based on professional veterinary judgment (<i>Guide</i>, p 121)</li> </ul>		_

	<ul> <li>Painful procedures are monitored to ensure appropriate analgesic management (Guide, p 122)</li> </ul>	Х				
	<ul> <li>Nonpharmacologic control of pain is considered as an element of post- procedural care (Guide, p 122)</li> </ul>	Х				
	<ul> <li>Procedures are in place to assure antinoception before surgery begins (Guide, p 122) [must]</li> </ul>	Х				
	<ul> <li>Guidelines for selection and use of analgesics and anesthetics are in place and regularly reviewed and updated (<i>Guide</i>, p 122)</li> </ul>	Х				
	<ul> <li>Special precautions for the use of paralytics are in place to ensure anesthesia<sup>xii</sup> (Guide, p 123)</li> </ul>	Х				
6.	Euthanasia	Α	M	S	С	NA
	<ul> <li>Methods are consistent with AVMA Guidelines on Euthanasia unless approved by the IACUC (Guide, p 123)</li> </ul>	Х				
	<ul> <li>Standardized methods are developed and approved by the veterinarian and IACUC that avoid distress and consider animal age and species (Guide, pp. 123-124)</li> </ul>	Х				
	<ul> <li>Training is provided on appropriate methods for each species and considers psychological stress to personnel (<i>Guide</i>, p 124)</li> </ul>	Х				
	<ul> <li>Procedures and training are in place to ensure death is confirmed (Guide, p 124) [must]</li> </ul>	Х				
7.	Drug Storage and Control	Α	M	S	С	NA
	<ul> <li>Program complies with federal regulations for human and veterinary drugs (Guide, p 115) [must]</li> </ul>	Х				
	<ul> <li>Drug records and storage procedures are reviewed during facility inspections (Guide, p 115)</li> </ul>	Х				
	<ul> <li>Procedures are in place to ensure analgesics and anesthetics are used within expiration date (Guide, p 122) [must]</li> </ul>	Х				
	<ul> <li>Anesthetics and analgesics are acquired, stored, and their use and disposal are recorded legally and safely (Guide, p 122)</li> </ul>	Х				

#### I. Semiannual Program Review Part C - Personnel Training and Occupational Health & Safety

Key:

A = acceptable

**M** = minor deficiency

S = significant deficiency (is or may be a threat to animal health or safety)
C = change in program (PHS Policy IV.A.1.a.-i.) (include in semiannual report to IO and in annual report to OLAW)

**NA** = not applicable

[must] = indicates actions that the Committee for the Update of the Guide considers imperative and mandatory duty or requirement for providing human animal care and use (Guide, p.8)

1.	IACUC Training	Α	M	S	С	NA
	All IACUC members should receive:					
	<ul> <li>Formal orientation to institution's program (Guide, p 17)</li> </ul>	X				
	<ul> <li>Training on legislation, regulations, guidelines, and policies (Guide, p 17)</li> </ul>	X				
	<ul> <li>Training on how to inspect facilities and labs where animal use or housin occurs (Guide, p 17)</li> </ul>					
	<ul> <li>Training on how to review protocols as well as evaluate the program (Guide, p 17)</li> </ul>	Х				
	Ongoing training/education ( <i>Guide</i> , p 17)	X				
2.	Personnel Qualifications and Training	A	М	S	С	NA
	<ul> <li>All personnel are adequately educated, trained, and/or qualified in basic principles of laboratory animal science. Personnel included [must]:</li> </ul>					
	<ul> <li>Veterinary/other professional staff (Guide, p 15-16)</li> </ul>	X				
	o IACUC members (Guide, p 17)	Х				
	<ul> <li>Animal care personnel (Guide, p 16)</li> </ul>	Х				
	<ul> <li>Research investigators, instructors, technicians, trainees, and students (Guide, pp. 16-17)</li> </ul>	Х				
	<ul> <li>Continuing education for program and research staff provided to ensure high quality care and reinforce training (Guide, pp. 16-17)</li> </ul>	Х				
	<ul> <li>Training is available prior to starting animal activity (Guide, p 17)</li> </ul>	X				
	Training is documented ( <i>Guide</i> , p 15)	Х				
	Training program content includes: (Guide, p 17)					
	Methods for reporting concerns ( <i>Guide</i> , p 17)	X				
	<ul> <li>Humane practices of animal care (e.g., housing, husbandry, handling) xii</li> </ul>					
	O Humane practices of animal use (e.g., research procedures, use of anesthesia, pre- and post-operative care, aseptic surgical techniques and euthanasia  (Guide, p 17)xiv					
	<ul> <li>Research/testing methods that minimize numbers necessary to obtain valid results (PHS Policy, <u>IV.A.1.g.</u>)</li> </ul>	Х				
	<ul> <li>Research/testing methods that minimize animal pain or distress (PHS Policy, IV.A.1.g.)</li> </ul>	Х				
	<ul> <li>Use of hazardous agents, including access to OSHA chemical hazard notices where applicable (<i>Guide</i>, p 20)</li> </ul>	Х				
	<ul> <li>Animal care and use legislation (Guide, p 17)</li> </ul>	Х				
	o IACUC function ( <i>Guide</i> , p 17)	X				
	<ul> <li>Ethics of animal use and Three R's (Guide, p 17)</li> </ul>	Х				
3.	Occupational Health and Safety of Personnel		M	S	С	NA
	<ul> <li>Program is in place and is consistent with federal, state, and local regulations (Guide, p 17) [must]</li> </ul>	X				
	<ul> <li>Program covers all personnel who work in laboratory animal facilities (Guide, p 18)</li> </ul>	Х				
	<ul> <li>Changing, washing, and showering facilities are available as appropriate (Guide, p 19)</li> </ul>	Х				
	<ul> <li>Hazardous facilities are separated from other areas and identified as limited access (Guide, p 19)</li> </ul>	X				

	<ul> <li>Personnel training is provided based on risk (e.g., zoonoses, hazards, personal hygiene, special precautions, animal allergies) (<i>Guide</i>, p 20)</li> </ul>	Х				
	<ul> <li>Personal hygiene procedures are in place (e.g., work clothing, eating/drinking/smoking policies) (<i>Guide</i>, p 20)</li> </ul>	Х				
	<ul> <li>Procedures for use, storage, and disposal of hazardous biologic, chemical, and physical agents are in place (<i>Guide</i>, <u>p 21</u>)</li> </ul>	Х				
•	<ul> <li>Personal Protective Equipment for the work area is appropriate and available (Guide, p 21)</li> </ul>	X				
	<ul> <li>Program for medical evaluation and preventive medicine for personnel includes:</li> </ul>					
	<ul> <li>Pre-employment evaluation including health history (Guide, p 22)</li> </ul>	X				
	<ul> <li>Immunizations as appropriate (e.g., rabies, tetanus) and tests as appropriate (Guide, p 22)</li> </ul>					Х
	<ul> <li>Zoonosis surveillance as appropriate (e.g., Q-fever, tularemia, Hantavirus plague) (Guide, p 23)</li> </ul>	s, X				
	<ul> <li>Procedures for reporting and treating injuries, including accidents, bites, allergies, etc. (Guide, p 23)</li> </ul>	X				
	<ul> <li>Promotes early diagnosis of allergies including preexisting conditions (Guide, p 22)</li> </ul>	Х				
	<ul> <li>Considers confidentiality and other legal factors as required by federal, state and local regulations (Guide, p 22) [must]</li> </ul>	Х				
	<ul> <li>If serum samples are collected, the purpose is consistent with federal and state laws (Guide, p 22) [must]</li> </ul>	d				Х
	Waste anesthetic gases are scavenged (Guide, p 21)	X				
	<ul> <li>Hearing protection is provided in high noise areas (Guide, p 22)</li> </ul>	X				
•	<ul> <li>Respiratory protection is available when performing airborne particulate work (Guide, p 22)</li> </ul>	Х				
	<ul> <li>Special precautions for personnel who work with nonhuman primates, their tissues or body fluids include:</li> </ul>	Х				
	<ul> <li>Tuberculosis screening provided for all exposed personnel (Guide, p 23)</li> </ul>	X				
	<ul> <li>Training and implementation of procedures for bites, scratches, or injurie associated with macaques (Guide, p 23)</li> </ul>	s X				
	<ul> <li>PPE is provided including gloves, arm protection, face masks, face shields, or goggles (<i>Guide</i>, p 21)</li> </ul>	X				
	<ul> <li>Injuries associated with macaques are carefully evaluated and treatment implemented (Guide, p 23)</li> </ul>	Х				
	<ul> <li>Occupational safety and health of field studies is reviewed by OSH committee or office (Guide, p 32)</li> </ul>	)				Х
<b>4.</b>	Personnel Security	Α	M	S	С	NA
	<ul> <li>Preventive measures in place include pre-employment screening, and physic and IT security (Guide, p 23)</li> </ul>	al X				

#### II. Semiannual Facility Inspection

Guidance for Inspectors: What constitutes a thorough IACUC inspection?

#### Terrestrial Animal Housing and Support Areas

#### Location:

- o animal areas separate from personnel areas (Guide, p 134)
- o separation of species (Guide, p 111)
- separation by disease status (Guide, p 111)
- o security and access control (Guide, p 151)

#### • Construction:

- o corridors (Guide, p 136)
- o animal room doors (Guide, p 137)
- o exterior windows (*Guide*, p 137)
- o floors (Guide, p 137)
- o drainage (Guide, p 138)
- o walls and ceilings (Guide, p 138)
- o heating ventilation and air conditioning (Guide, p 139)
- o power and lighting (Guide, p 141)
- o noise control (Guide, p 142)
- o vibration control (Guide, p 142)
- o environmental monitoring (*Guide*, p 143)

#### Room/Cage:

- o temperature and humidity (Guide, p 43)
- o ventilation and air quality (Guide, p 45)
- o illumination (Guide, p 47)
- o noise and vibration (Guide, p 49)

#### Primary Enclosure:

- o space meets physiologic, behavioral xv, and social xvi needs (Guide, pp 51, 55-63)
- secure environment provided (Guide, p 51)
- o durable, nontoxic materials in good repair and no risk of injury (Guide, p 51)
- o flooring is safe and appropriate for species (Guide, p 51)
- adequate bedding and structures for resting, sleeping, breeding (Guide, p 52)
- o objective assessments of housing and management are made (Guide, p 52)
- o procedures for routine husbandry are documented (Guide, p 52)
- o socially housed animals can escape or hide to avoid aggression (Guide, p 55)
- cage height provides adequate clearance (Guide, p 56)
- animals express natural postures, can turn around, access food and water, and rest away from urine and feces (Guide, p 56)
- o rationale xvii for *Guide*/USDA space exceptions approved by IACUC and based on performance indices (*Guide*, p.56)
- o dogs and cats allowed to exercise and provided human interaction (Guide, p 58)
- o nonhuman primates are socially housed except for scientific, veterinary or behavior reasons (*Guide*, pp 58-59)
- o single housing of nonhuman primates is for shortest duration possible (Guide, p 60)
- o opportunities for release into larger enclosures is considered for single caged nonhuman primates (*Guide*, <u>p 60</u>)
- o agricultural animals are housed socially (Guide, p 60)
- o food troughs and water devices for agricultural animals allow access for all animals (Guide, p 60)

#### • Environmental Enrichment, Behavioral and Social Management:

- o structures and resources promote species typical behavior (Guide, pp 52-54)
- o novelty of enrichment is considered (Guide, p 53)
- o species specific plans for housing including enrichment, behavior and activity are developed and reviewed regularly by IACUC, researchers and veterinarian (*Guide*, pp 53, 58, 60, 63)
- o animal care personnel receive training to identify abnormal animal behaviors (Guide, p 53)
- o stability of pairs or groups is monitored for incompatibility (Guide, p 64)
- single housing is justified for social species (Guide, p 64)
- single housing is limited to the minimum period necessary (Guide, p 64)

- additional enrichment for single housed animals is provided (Guide, p 64)
- o single housing is reviewed regularly by IACUC and veterinarian (Guide, p 64)
- o habituation to routine procedures is part of enrichment program (Guide, p 64)

#### Sheltered or Outdoor Housing: (e.g., barns, corrals, pastures, islands)

- o weather protection and opportunity for retreat (*Guide*, p 54)
- o appropriate size (Guide, p 54)
- o ventilation and sanitation of shelter (no waste/moisture build-up) (Guide, p 54)
- o animal acclimation (Guide, p 55)
- o social compatibility (Guide, p 55)
- o roundup/restraint procedures (Guide, p 55)
- o appropriate security (Guide, p 55)

#### • Naturalistic Environments:

- o animals added /removed with consideration of effect on group (Guide, p 55)
- o adequate food, fresh water, and shelter ensured (*Guide*, p. 55)

#### Food:

- o feeding schedule and procedures including caloric intake management (Guide, pp 65-67)
- o contamination prevention (Guide, p 65)
- o vendor quality control (Guide, p 66)
- o storage in sealed containers (Guide, p 66)
- o expiration date labeling (Guide, p 66)
- o vermin control (Guide, p 66)
- o rotation of stocks (Guide, p 66)

#### Water:

- o ad libitum unless justified (Guide, pp 67-68)
- QC procedures (Guide, pp 67-68)

#### • Bedding and Nesting Materials:

- species appropriate (Guide, pp 68-69)
- o keeps animals dry (Guide, pp 68-69)
- o QC procedures (Guide, pp 68-69)
- o minimizes scientific variables (Guide, pp 68-69)

#### Sanitation:

- o frequency of bedding/substrate change (Guide, p 70)
- o cleaning and disinfection of microenvironment (Guide, pp 70-71)
- o cleaning and disinfection of macroenvironment (Guide, p 72)
- o assessing effectiveness (Guide, p 73)

#### Waste Disposal:

- o procedures for collection (Guide, pp 73-74)
- o procedures for storage and disposal (Guide, pp 73-74)
- o hazardous wastes are rendered safe before removal from facility (Guide, pp 73-74)
- o animal carcasses (Guide, pp 73-74)

#### Pest Control:

- o regularly scheduled (Guide, p 74)
- o documented program including control of rodent pests and insecticide use (Guide, p 74)

#### Emergency, Weekend, and Holiday Animal Care:

- o care provided by qualified personnel every day (Guide, p 74)
- o provision for accessible contact information (*Guide*, p.74)
- o monitoring of backup systems (Guide, p 143)
- o veterinary care available after hours, weekends, and holidays (Guide, pp 74, 114)
- o a disaster plan that takes into account both personnel and animals (Guide, p 75)

#### Identification:

- o cage/rack cards contain required information (Guide, p 75)
- o genotype information included and standardized nomenclature used when applicable (Guide, p.75)

#### Recordkeeping:

- o clinical records accessible and contain appropriate information (Guide, pp 75-76)
- o records are provided when animals are transferred between institutions (Guide, p 75)

#### • Breeding Genetics and Nomenclature:

- o appropriate genetic records, management and monitoring procedures (Guide, p 76)
- o phenotypes that affect wellbeing are reported to IACUC and effectively managed (Guide, p 77)

#### Storage:

- o adequate space for equipment, supplies, food, bedding and refuse (Guide, p 141)
- o bedding in vermin-free area and protected from contamination(*Guide*, p 141)
- food in vermin-free, temperature and humidity controlled area and protected from contamination (Guide, p 141)
- refuse storage is separate (Guide, p 141)
- o carcass and animal tissue storage is separate, refrigerated below 7°C and cleanable (Guide, p 141)

#### Personnel:

o adequate space for locker rooms, administration and training (Guide, p 135)

#### Aquatic Animal Housing and Support Areas

#### Location:

- o animal areas separate from personnel areas (Guide, p 134)
- o separation of species (Guide, p 111)
- o separation by disease status (Guide, p 111)
- o security and access control (Guide, p 151)

#### • Construction:

- o corridors (Guide, p 136)
- o animal room doors (Guide, pp 137, 150)
- o exterior windows (Guide, p 137)
- o floors (Guide, pp 137, 150)
- o drainage (Guide, pp 138, 150)
- o walls and ceilings (Guide, pp 138, 150)
- o heating ventilation and air conditioning (Guide, pp 139, 150-151)
- o power and lighting (Guide, pp 141, 150)
- o noise control (Guide, p 142)
- o vibration control (Guide, p 142)
- environmental monitoring (Guide, p 143)

#### Water Quality:

- o standards for acceptable quality are established (Guide, p 78)
- chlorine, chloramines, chemical, and reactive bioproducts are removed or neutralized prior to use in aquatic systems (*Guide*, pp78, 86)

# Life Support System:

- o water source is based on appropriate controls and research requirements (Guide, p 79)
- o biofilter is of sufficient size to process bioload (Guide, p 80)

#### Temperature, Humidity and Ventilation/Illumination/Noise and Vibration:

- o temperature and humidity (Guide, pp 43, 80-81)
- o ventilation and air quality (Guide, pp 45, 81)
- o illumination (Guide, pp 47, 81)
- o noise and vibration (Guide, pp 49, 81)

#### • Primary Enclosure:

- o allows for normal physiological and behavioral needs (Guide, p.82)
- o allows social interaction for social species (Guide, p.82)
- provides a balanced, stable environment (Guide, p.82)
- provides appropriate water quality and monitoring (Guide, p.82)
- allows access to food and waste removal (Guide, p 82)
- restricts escape and entrapment (Guide, p 82)
- o allows undisturbed observation (Guide, p 82)
- o constructed of nontoxic materials (Guide, p 82)
- prevents electrical hazards (Guide, p 82)
- space needs of species are evaluated by IACUC during program evaluations and facility inspections (Guide, p 83)

#### Environmental Enrichment, Social Housing, Behavioral and Social Management:

- o enrichment elicits appropriate behaviors and is safe (Guide, p 83)
- o semi-aquatic reptiles are provided terrestrial areas (Guide, p.83)
- handling is kept to a minimum and appropriate techniques are in place at facility or protocol level (Guide, p 84)
- o nets are cleaned, disinfected and managed to avoid contamination of systems (Guide, p 84)

#### Food:

- o storage to prevent contamination, preserve nutrients and prevent pests (Guide, p 84)
- o delivery ensures access to all, minimizing aggression and nutrient loss (Guide, p 84)
- storage times are based on manufacturer recommendations or accepted practice (Guide, p. 84)
- o a nutritionally complete diet is provided (Guide, p 84)

#### Substrate:

o amount, type and presentation of substrate is appropriate for the system and the species (Guide, p 85)

#### Sanitation, Cleaning and Disinfection

- frequency of tank/cage cleaning and disinfection is determined by water quality, permits adequate viewing and health monitoring (*Guide*, p. 86)
- o cleaning and disinfection of macroenvironment (Guide, p 86)

#### Waste Disposal:

- procedures for collection (Guide, pp 73-74)
- o hazardous wastes are rendered safe before removal from facility (Guide, pp 73-74)
- o animal carcasses (Guide, pp 73-74)

#### Pest Control:

- o regularly scheduled (Guide, p 74)
- o documented program including control of pests and insecticide use (Guide, p 74)

#### • Emergency, Weekend, and Holiday Animal Care:

- o care provided by qualified personnel every day (Guide, pp 74, 87)
- o provision for accessible contact information (Guide, pp 74, 87)
- emergency response plans in place to address major system failures (Guide, 87)
- o veterinary care available after hours, weekends, and holidays (*Guide*, pp 74, 114)

#### Identification:

- o cage/tank cards contain required information (Guide, pp 75, 87)
- o genotype information included and standardized nomenclature used when applicable (Guide, pp 75, 87)

#### Recordkeeping:

- o water quality parameters and frequency of testing recorded (Guide, p 88)
- o records kept on feeding, nonexpired food supplies, live cultures (Guide, p. 88)

#### Storage:

- o adequate space for equipment, supplies, food, substrate and refuse (Guide, p 141)
- substrate protected from contamination (Guide, p 141)
- food in vermin-free, temperature and humidity controlled area and protected from contamination (Guide, p 141)
- o refuse storage is separate (Guide, p 141)
- carcass and animal tissue storage is separate, refrigerated below 7°C and cleanable (Guide, p 141)

#### Personnel:

o adequate space for locker rooms, administration and training (Guide, p 135)

#### Cagewash

#### Construction and Operation:

- o dedicated central area for sanitizing cages and equipment is provided (Guide, p 143)
- cage-washing equipment meets need (Guide, p 143)
- o doors, windows, floors, drainage, walls, ceilings (Guide, pp 136-138)
- o convenient to animal areas/waste disposal (Guide, p 143)
- o ease of access (including door size) facilitates use (Guide, p 143)
- o sufficient space for staging and maneuvering (Guide, p 143)
- safety precautions/clothing/equipment used for waste disposal/prewash/acid wash (Guide, p 143)
- traffic flow clean to dirty with no contamination of clean equipment by dirty equipment and appropriate air pressurization (Guide, p 143)
- o insulation and/or sound attenuation present as needed (Guide, p 143)
- o utilities are appropriate (Guide, p 143)
- ventilation meets heat and humidity load (Guide, p 143)
- o safety features (e.g., SOPs, warning signs, eyewash stations) are in use (Guide, p 143)
- o functioning safety devices to prevent entrapment in washer/sterilizers (Guide, p 143)
- o cage wash temperatures are monitored and records are available (Guide, p 73)
- o appropriate clean cage storage (Guide, p 141

#### Special Facilities: Aseptic Surgery

#### • General Considerations:

- o location minimizes traffic/contamination (Guide, p 144)
- functional components (surgical support, animal preparation, surgeon scrub, operating room, postoperative recovery) are designed and separated (physically or otherwise) (Guide, p 144)
- appropriate drug storage, control, expiration date monitoring (Guide, pp 115, 122)
- o safe sharps disposal system (Guide, p 74)
- o adequate records of anesthesia and perioperative care (Guide, p 122)
- o aseptic procedures in use for all survival surgery (Guide, pp 118-119)

#### • Operating Room:

- o effective contamination control procedures (Guide, p 144)
- o effective cleaning procedures/dedicated tools (Guide, p 145)
- o interior surfaces smooth and impervious to moisture (Guide, p 145)
- HVAC system meets Guide requirements (Guide, p 145)
- o lighting safe and appropriate (Guide, p 145)
- o outlets safe and appropriate (Guide, p 145)
- scavenging of anesthetic gases implemented (Guide, <u>p 145</u>)

#### Surgical Support:

- o facility for washing, sterilizing, storing instruments and supplies (Guide, p 145)
- autoclave monitoring procedures are implemented (Guide, pp 119, 145)
- storage of autoclaved materials maintains sterility (Guide, p 145)
- cold sterilization procedures are appropriate (Guide, p 119)

#### Animal Preparation

Contains large sink to facilitate cleaning of animal and operative site (Guide, p 145)

#### Surgeon Scrub

o outside operating room, non-hand-operated sink (Guide, p 145)

#### Postoperative Recovery

 allows adequate observation, easily cleaned, supports physiologic functions, minimizes risk of injury
 (Guide, p 145)

#### Dressing Area

o place for personnel to change (Guide, p 145)

Special Facilities: Procedure Areas, Non-survival Surgeries, Laboratories, Rodent Surgeries, Imaging, Whole Body Irradiation, Hazardous Agent Containment, Behavioral Studies

#### • General Considerations:

- o labs used to house animals only when scientifically required and limited to minimum period necessary (*Guide*, p 134)
- o drug storage, control, and expiration dates (Guide, pp 115, 122)
- o sharps disposal (Guide, p 74)
- o anesthetic monitoring (Guide, p 120)
- o scavenging of anesthetic gases (Guide, p 21)
- safety features (e.g., SOPs, safety signs, eyewash stations, secure gas cylinders) are in place (Guide, p
   19)
- o carcass disposal (Guide, pp 73-74)

# Additional Concerns for Survival Surgery: (rodent and minor procedures only)

- o rodent survival surgery clean and uncluttered, not used for anything else during surgery (Guide, p 144)
- o records of peri-operative care (Guide, p 120)
- o aseptic procedures (Guide, pp 118-119)
- o autoclave monitoring procedures (Guide, pp 119, 145)
- o storage of autoclaved materials (Guide, p 145)
- o cold sterilization procedures are appropriate (Guide, p 119)

#### • Imaging/Whole Body Irradiation:

- o location of resource limits contamination risk (Guide, p 147)
- o appropriate transportation methods are in place (Guide, p 147)
- o gas anesthesia provision, scavenging and monitoring are appropriate (Guide, p 147)
- o appropriate sensors and ventilation are provided for cryogen gases (Guide, p 147)
- o imaging console is located away from radiation source (Guide, p 147)

#### • Hazardous Agent Containment:

facility adheres to APHIS, USDA and CDC Select Agent Regulations and other federal, state and local regulations including security measures (*Guide*, p 148)

#### Behavioral Studies:

- o facility minimizes airborne transmission of noise and ground-borne transmission of vibration (*Guide*, <u>p</u> 149)
- floor coverings reduce sound transmission (Guide, p 149)
- testing equipment allows for surface disinfection (Guide, p 150)
- components that cannot be cleaned are not in ready contact with animals and kept covered when not in use (*Guide*, p 150)
- o housing areas are contiguous with testing areas when appropriate (Guide, p 150)

II.	Semiannual Facility Inspection	
	Part A -	Animal Facility
	Key:	
	A = acceptable	
	M = minor deficiency	
	S = significant deficiency (is or may be a threat to anim	al health or safety)
		le in semiannual report to IO & annual report to OLAW)
	NA = not applicable	,
	Individuals participating in this inspection:	

Room #	Describe Use	Α	M	S	С	NA
	Supplies/equipment storage	Х				
	Waste material storage & Mister Unit	Х				
	Refrigerated Waste Holding	Х				
	Surgery (Multiple users) Covered under PAM program for individual la	bs				
	Dirty cage wash	Х				
	Chemical storage	Х				
	Cylinder gas system: Light switch not working		Х			
	Water supply	Х				
	Necropsy	Х				
	Equipment storage room	Х				
	Bedding storage: One pallet too close to wall		X			
	Clean cage wash	Х				
	Food storage	X				
	Clean cage storage	Х				
	housing: Murky water in static tanks		X			
	pump room	X				
	Fluorescent screening room ( Covered under PAM prog	gram for	individ	lual la	bs	
	housing: Water on floor by door. Food jar not labeled with expiration date		X			
	lab (Multiple users) Covered under PAM program for individual lal	bs				
	warm housing (Multiple users) Covered under PAM program for in		labs			
	Clinical lab/technician office	X				
	Procedure room	Х				
	housing	X				
	housing	Х				
	housing	X				
	housing Covered under PAM program for individual					
	housing	X				
	housing	X				

	Animal Housing & Support Areas										
Room #	Describe Use	Α	M	S	С	N/					
	Behavior test room (multiple users) Covered under PAM program for inc	lividual	labs								
	Behavior test room Covered under PAM program for individual	dual la	bs								
	Behavior test room Covered under PAM program for individua	l labs									
	Behavior test room (multiple users) Covered under PAM program for inc	lividual	labs								
	RCL vestibule	Х									
	RCL housing	X									
	Storage (future use:	Х									
	RCL housing	Х									
	RCL procedure room: 5% glucose and other solutions in refrigerator with no expiration date		Х								
	Transgenic gown-in – temporary storage of behavioral testing equipment	X									
	Behavior test room (Multiple users) Covered under PAM program for inc	lividual	labs								
	Behavior test room (Multiple users) Covered under PAM program for inc	lividual	labs								
	Behavior test room (Multiple users) Covered under PAM program for indi	ividual	labs								
	Behavior test room (Multiple users) Covered under PAM program for inc	lividual	labs								
	PI-assigned procedure room Covered under PAM program for individual labs										
	PI-assigned procedure room Covered under PAM program for	r indiv	idual la	abs							
	Storage										
	housing: Cart in room needs to be cleaned		Х								
	housing	Х									
	housing	X									
	PI-assigned procedure room (Multiple users) Covered under PAM progra	am for i	individ	lual la	bs						
	PI-assigned imaging area (Multiple users) Covered under PAM program	for inc	lividua	ıl labs							
	Procedure area	Х									
	PI-assigned imaging area (Multiple users) Covered under PAM program	n for in	dividu	al labs	S						
	Procedure room	Х									
	Equipment Storage	Х									
	PI-assigned procedure room Covered under PAM program for it	ndividu	ıal lab	s							
	PI-assigned procedure room Covered under PAM program for in	ndividu	al labs	S							
	RCL Housing	Х									
	Housing	Х									
	Housing	Х									
	Procedure room	Х									
	Procedure room	Х									
	Storage	Х									
	Housing	Х									
	Empty	Х									

II.	Semiannual Facility Inspection
	Part B - Animal Facility
Key	<i>y</i> :
'	A = acceptable
	M = minor deficiency
	<b>S</b> = significant deficiency (is or may be a threat to animal health or safety)
	<b>C</b> = change in program (PHS Policy IV.A.1.ai.) (include in semiannual report to IO & in annual report to OLAW)
	NA = not applicable
	Individuals participating in this inspection:
	marriada participating in the inoposition

Animal Housing & Support Areas								
Room #	Describe Use	Α	M	S	С	NA		
	Cage wash: Check for expiration date on floor stripper	Х						
	Out of service					Х		
	Clean storage	Х						
	Food storage	Х						
	Bedding storage	Х						
	Out of service							
	Bottle fill & clean storage	Х						
	Out of service							
	Out of service							
	Out of service							
	Out of service							
	Micro CT procedure room Covered under PAM program for individual la	bs						
	Laundry	Х						
	Out of service							

Animal Housing & Support Areas								
Room #	Describe Use	Α	М	S	С	NA		
	housing	Х						
	Procedure room: Expired OCT for lab		X					
	Procedure room							
	Quarantine	Х						
	housing	Х						
	housing: Expired treats	Х						
	housing							
	Procedure room	Х						
	Procedure room	Х						
	housing: Expired treats	Х						
	housing	Х						

Room #	Describe Use	Α	M	S	С	NA
	Dead Animal Storage:	X				
	Sharps Container Storage	X				
	Trash room	X				
	Bulk chemical storage	X				
	Autoclave – currently inoperable					Х
	Euthanasia room	X				
	Quarantine	X				
	Storage: Light not working		Х			
	Storage	X				
	Storage	X				
	Storage	X				
	housing	X				
	lab	X				
	mechanical	X				

Facility Animal Housing & Support Areas							
Room #	Describe Use	Α	M	S	С	NA	
	Non-sterile entrance/gowning area	Х					
	Spray lock	X					
	Shared equipment/procedure room	Х					
	Clean procedure room	X					
	Biocontainment housing	X					
	Staging/dirty side of autoclave	Х					
	Clean storage/clean side of autoclave	X					
	housing	Х					
	housing	Х					
	BSL procedure room	X					

# Key: A = acceptable M = minor deficiency S = significant deficiency (is or may be a threat to animal health or safety) C = change in program (PHS Policy IV.A.1.a.-i.) (include in semiannual report to IO & in annual report to OLAW) NA = not applicable Individuals participating in this inspection:

		Surgical & Support Areas					
Room #	Describe Use		Α	M	S	С	NA
	prep room	Covered under PAM program for individual labs					
	lab Covered under PAM program for individual labs						
	OR 4 Covered under PAM program for individual labs						
	OR 1 - storage		X				
	OR prep/lobby		X				
	Storage		X				
	OR SCRUB		X				
	OR 3		X				
	OR storage / lau	ndry	X				

	Animal Housing & Support Areas					
Room #	Describe Use	Α	М	S	С	NA
	Cage wash – clean side	Х				
	Cage wash – dirty side	Х				
	Equipment storage/supplies	Х				
	Housing	Х				
	Procedure room	Х				
	animal housing	Х				
	Dead animal cooler	Х				
	Chemical storage	Х				
	Ante area	Х				
	Food cooler	Х				
	Bedding	Х				
	Isolation / Biohazard housing	Х				
	Procedure room	Х				
	housing	Х				
	housing	Х				
	Procedure room	Х				
	housing	Х				
	Necropsy:		X			

	Animal Housing & Support Areas								
Room #	Room # Describe Use				С	NA			
	Storage – out of service	X							
	Hallways near and vivarium entrance	Х							
	loading dock	Х							

II.	Semiannual Facility Inspection	n
	Part D – DLAR	

# Key:

A = acceptable

**M** = minor deficiency

S = significant deficiency (is or may be a threat to animal health or safety)
C = change in program (PHS Policy IV.A.1.a.-i.) (include in semiannual report to IO and in annual report to OLAW)

**NA** = not applicable

Individuals participating in this inspection:

DLAR					
	Α	M	S	С	NA
DLAR	Х				

# III. Report of Deficiencies and Corrective Action Schedule

# Key:

A = acceptable

**M** = minor deficiency

**S** = significant deficiency (is or may be a threat to animal health or safety)

**C** = change in program (PHS Policy <u>IV.A.1.a.-i.</u>) (include in semiannual report to IO & in annual report to OLAW)

**NA** = not applicable

Deficiency Category*	Room/Area	Deficiency & Corrective action	Responsible Party	Correction Deadline	Date Completed
М		Light switch not working		4/15/19	4/15/19
М		Pallet too close to wall		4/9/19	4/9/19
М		Murky water in static tanks (Notified Lab)		4/15/19	4/11/19
М		Water on floor by door		4/9/19	4/9/19
М		Need to clean the cart		4/9/19	4/9/19
А		Check for exp. Date on floor stripper			NA as per
М		OCT expired	Lab	5/10/19	5/10/19
Α		Expired treats		4/8/19	4/8/19
Α		Expired treats		4/8/19	4/8/19
Α		Consider moving food freezer			As per will wait until after renovations
М		Light out		4/16/19	4/16/19
М				4/9/19	4/9/19

# **IV. Minority Comments**

No minority opinions were expressed during the program review and facilities inspections.

# V. Inspections/Post-approval Monitoring

INSERT INFORMATION FROM THE EXCEL	CDDEADCHEET "Lab Increations"
INSERT INFORMATION FROM THE EXCEL	SPREADSHEET Lab inspections

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
11/1/2018							Protocol inactive at time of SV; postponed.
11/1/2018							Protocol inactive at time of SV; postponed.
11/1/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
11/1/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
11/1/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
11/1/2018							Procedures described were consistent with protocol. Space appropriate for intended use.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
11/1/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
11/1/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
11/1/2018							Covered under the SAFI.
11/1/2018							Covered under the SAFI.
11/1/2018							Covered under the SAFI.
11/1/2018							Postponed because model is still under development.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
11/1/2018							Procedures described were consistent with protocol. Performed under supervision of Space appropriate for intended use.
11/1/2018							Procedures described were consistent with protocol. Space appropriate for intended use.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
11/1/2018				ļ			Procedures described were consistent with protocol. Space appropriate for intended use.
11/1/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
11/1/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
11/1/2018							Covered under the SAFI.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
11/7/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
11/7/2018							covered under inspection. Reviewed transportation of animals from/to DLAR.
11/7/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
11/7/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
11/7/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
11/13/2018							facility - multi-user. See lab site visit.
11/13/2018							Procedures described were consistent with protocol. Space appropriate for intended use.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
11/13/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
11/13/2018					T		Procedures described were consistent with protocol. Space appropriate for intended use.
11/13/2018							Covered under the SAFI.
11/13/2018							Procedures described were consistent with protocol. Behavioral assessment not being conducted in this space at this time. Space appropriate for intended use.
11/13/2018							Procedures described were consistent with protocol. Space appropriate for intended use.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
11/13/2018							Covered under the SAFI.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/3/2018							Covered under the SAFI.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/3/2018							Procedures described were consistent with protocol. Space

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
							appropriate for intended use.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/3/2018							Covered under the SAFI.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
12/3/2018							No plans to perform these procedures in the next six months. Did not visit.
12/3/2018							No plans to perform these procedures in the next six months. Did not visit.
12/3/2018							No plans to perform these procedures in the next six months. Did not visit.
12/3/2018							No plans to perform these procedures in the next six months. Did not visit.
12/3/2018							No plans to perform these procedures in the next six months. Did not visit.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/3/2018							Covered under the SAFI.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
12/3/2018							Covered under the SAFI.
12/3/2018							Covered under the SAFI.
12/3/2018							Project is in its initial stages and these procedures have not yet begun; location(s) to be determined.in consultation with Attending/Clinical Vet(s).
12/3/2018							Procedures described were consistent with protocol. Space

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
							appropriate for intended use.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/3/2018							Covered under the SAFI.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/3/2018							Procedures described were consistent with

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
							protocol. Space appropriate for intended use.
12/3/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/10/2018							
12/11/2018							facility - multi-user. See lab site visit.
12/11/2018							surgeries are not being performed in nor at this time. This surgery
							shared procedure room).
							this time. No plans to use in the near future.
12/11/2018					7		Procedures described were consistent with

	ROOM	IACUC	SPECIES	USE	SV COMMENTS
					protocol. Space appropriate for intended use.
					Covered under the SAFI.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
12/11/2018							surgeries are not being performed in at this time. This surgery may be performed in shared procedure room). Imaging may also be performed in the but details must be worked out in advance.
12/12/2018							Procedures described were consistent with protocol. See lab site visit.
12/12/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/12/2018							Space is covered under lab site visit.
12/12/2018							Covered under the SAFI.  done under the supervision of

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
							in DLAR space.
12/17/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/17/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/17/2018						-	Has not performed in past six months. No plans to resume in next 6 months.
12/17/2018							Procedures described were consistent with protocol. Space appropriate for intended use.
12/17/2018							Covered under the SAFI.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
1/7/2019							Have not performed in past six months; may resume in next 6 months in procedure room).
1/7/2019							Procedures described were consistent with protocols. Space appropriate for intended use.
1/7/2019							Covered under the SAFI.
1/7/2019							This surgery is not begin done at this time. Space appropriate for intended use.
1/7/2019							Procedures described were consistent with protocol. Space appropriate for intended use.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
1/7/2019							This testing is not currently being performed. No animals housed in room.
1/7/2019							Procedures described were consistent with protocols. Space appropriate for intended use.
1/7/2019							Procedures described were consistent with protocols. Space appropriate for intended use.
1/7/2019							Covered under the SAFI.
1/8/2019							Have not performed in past six months; may resume in next 6 months in procedure room).
1/8/2019							Have not performed in past six months; may resume in next 6 months.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
1/8/2019							Covered under the SAFI.
1/8/2019							Covered under the SAFI.
1/8/2019							2 pm with
1/8/2019							2 pm with
1/8/2019					Ŧ		2 pm with

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
1/8/2019					T		Covered under the SAFI.
1/14/2019							experiments have not yet begun. Space appropriate for intended use. Hood needs recertification from outside company. Has been scheduled by

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
							CORRECTION DATE: 3/14/19 DATE CORRECTED:
1/14/2019							Covered under the SAFI.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
1/15/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
1/15/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
1/15/2019							Currently not being performed at this time.
1/15/2019							Covered under the SAFI.
1/15/2019							Covered under the SAFI.
1/24/2019							Procedure(s) have not started.
1/24/2019							Addendum to modify existing required. Space appropriate for intended use.  Correction date: 2/28/19 Date Corrected: 2/18/19

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
1/24/2019							has not started. Space appropriate for intended use.
1/24/2019					•		surgeries have not started. Space appropriate for intended use.
1/24/2019							Covered under SAFI.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
1/24/2019							Procedure(s) have not started.
1/24/2019							Procedure(s) have not started.
1/24/2019							Procedure(s) have not started.
2/4/2019							Procedures described were consistent with protocol. Space appropriate for intended use. Unfortunately, machine is broken; unknown when it may be fixed.
2/4/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
2/4/2019							Covered under the SAFI.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
DATE	FI	BLUG	ROOM	IACOC	SPECIES		SV COMMENTS
2/4/2019 2/4/2019 2/4/2019							Procedures described were consistent with protocol. Space appropriate for intended use.  Procedures described were consistent with protocol. Space appropriate for intended use.  Covered under the SAFI.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
2/12/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
2/12/2019							Space covered under lab inspection. These experiments have not yet begun.
2/12/2019							Covered under the SAFI.
2/13/2019							Space appropriate for intended use. Procedures described were consistent with the protocols. Most work is on hold due to development of specific lines of animals and personnel turnover.
2/13/2019							Space appropriate for intended use. Procedures described were consistent with the

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
							protocols. Lab will hold a multi-lab training session on the use of the OCT imaging equipment.
2/13/2019							Covered under the SAFI.
2/15/2019							This space is covered under the lab inspection. These experiments have not yet begun.
2/15/2019							AlthoughVaporizer recertification is due in April, they can hold off until October to get them on the overall recertification schedule managed by
2/15/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
2/15/2019							These experiments have not yet begun.
2/15/2019							Currently,

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
							being performed; no plans to resume these procedures within the next six months. Space appropriate for intended use.
2/15/2019							Currently unused; no plans to resume in the next six months. Did not look at this space.
2/15/2019							Currently unused; no plans to resume in the next six months. Did not look at this space.
2/15/2019							Currently unused; no plans to resume in the next six months. Did not look at this space.
2/15/2019							Currently unused; no plans to resume in the next six months. Did not look at this space.
2/15/2019							Currently unused; no plans to resume in the next six months. Did not look at this space.
2/15/2019							Covered under the SAFI.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
2/19/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
2/19/2019							Covered under the SAFI.
2/19/2019							Lab just moved from , still unpacking boxes and animal surgery area is not ready at the time of inspection. Lab does not have any animals at this time.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
2/19/2019							Covered under the SAFI.
3/7/2019							Covered under the SAFI.
3/7/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/7/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/7/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/7/2019							Procedures described were consistent with protocol. Space appropriate for intended use.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
3/7/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/8/2019							Covered under the SAFI.
3/8/2019							No use of controlled substances during the past six months; no plans for next six months.
3/8/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/8/2019							No performed within the past six months. Space covered under lab.
3/8/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/8/2019							Procedures described were consistent with protocol. Space appropriate for intended use.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
3/8/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/8/2019							Procedures described were consistent with protocol. Space appropriate for intended use.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
3/12/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/12/2019							Covered under the SAFI.
3/12/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/12/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/12/2019							Procedures described were consistent with protocol. Space appropriate for intended use. Log for feeding/cleaning was put in this room for use.
3/12/2019							Covered under the SAFI.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
3/12/2019							No animals at time of site visit.
3/12/2019							Protocol currently inactive.
3/12/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/12/2019							Covered under the SAFI.
3/12/2019							Covered under the SAFI.
3/12/2019							Have not performed in past six months; no plans

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
							to resume in next six months.
3/12/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/12/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/12/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/12/2019							Procedures described were consistent with protocol. Space appropriate for intended use.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
3/12/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/12/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/12/2019					•		Covered under the SAFI.
3/19/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/19/2019							Covered under the SAFI.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
3/19/2019							Covered under the SAFI.
3/19/2019							Procedures described were consistent with protocol. See lab site visit.
3/19/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/19/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/19/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/19/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
3/19/2019							Procedures described were consistent with protocol. Space appropriate for intended use.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
3/19/2019						Housing & husbandry	Put in request for hoods to be recertified. Due at end of March. Certified on 3-20-19.
4/9/2019							Procedures described were consistent with protocol. Space appropritate for intended use.
4/9/2019							Procedures described were consistent with protocol. Space appropritate for intended use.
4/9/2019							Procedures described were consistent with protocol. Space appropritate for intended use.
4/9/2019							Covered under the SAFI.
4/9/2019							Hood will need inspection on 4/25/2019. will contact for

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
							this. Update 4/17- inspected hoods- all good.
4/9/2019 4/9/2019							facility - multi-user. See lab site visit. Covered under the SAFI.
,, 6, 2020							

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
4/9/2019							Procedures described were consistent with protocol. Space appropriate for intended use.
4/9/2019							Procedures described were consistent with protocol. Space appropriate for intended use.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS
4/10/2019							
4/10/2019							Covered under the SAFI.
4/24/2019							Procedures described were consistent with protocol.
4/24/2019							
4/24/2019							Covered under the SAFI.

DATE	PI	BLDG	ROOM	IACUC	SPECIES	USE	SV COMMENTS

## **Endnotes**

<sup>i</sup> The PHS Policy requires that Assured institutions comply with the regulations (9 CFR, Subchapter A) issued by the U.S. Department of Agriculture (USDA) under the Animal Welfare Act, as applicable. The endnotes below are specific USDA regulatory requirements that differ from or are in addition to the PHS Policy. This list is not intended to be all inclusive. For additional information please refer to 9 CFR Subchapter A - Animal Welfare.

- ii Part 2 Subpart C Research Facilities
- 2.31(b)(2) "The Committee shall be composed of a Chairman and at least two additional members;...at least one shall not be affiliated in any way with the facility...such person will provide representation for general community interests in the proper care and treatment of animals." [PHS policy requires 5 members]
- iii 2.32(c)(4) "...No facility employee, Committee member, or laboratory personnel shall be discriminated against or be subject to any reprisal for reporting violations of any regulation or standards under the Act." [USDA requirement additional to PHS Policy]
- iv 2.31(d)(5) "...shall conduct continuing reviews of activities...not less than annually." [PHS Policy requires a complete new review every 3 years utilizing all the criteria for initial review]
- v 2.31(d)(1)(x) "...no animal will be used in more than one major operative procedure from which it is allowed to recover unless...(it is) justified for scientific reasons...(or is) required as routine veterinary procedure...or other special circumstances as determined by the Administrator on an individual basis." [this last point is an additional USDA justification for multiple survival surgeries]
- vi 2.36 "...each reporting facility shall submit an annual report to the APHIS, AC sector supervisor for the State where the facility is located on or before December 1 of each calendar year." [The USDA annual report has a list of requirements which differ from PHS annual report]
- vii 2.36(b)(3) "...exceptions to the standards and regulations be specified and explained by the principal investigator and approved by the IACUC. A summary of all such exceptions must be attached to the facility's annual report." [Refers to USDA annual report]
- viii 2.31(c)(3) "...Any failure to adhere to the plan and schedule that results in a significant deficiency remaining uncorrected shall be reported in writing within 15 business days by the IACUC, through the institutional official, to APHIS and any Federal agency funding that activity." [PHS Policy requires prompt reporting to OPRR of serious or continuing noncompliance with the PHS Policy or serious deviations from the provisions of the *Guide*]
- ix 2.36 "...each reporting facility shall submit an annual report to the APHIS, AC sector supervisor for the State where the facility is located on or before December 1 of each calendar year." [The USDA annual report has a list of requirements which differ from PHS annual report]
- x In addition to PHS requirements for IACUC review/application for funding, USDA regulations require: 2.31(d)(1)(ii) - "The principal investigator (PI) consider alternatives to procedures that cause more than momentary or slight pain or distress to the animals, and has provided a written narrative description of the methods and sources...used to determine that alternatives were not available."
  - 2.31(d)(1)(iii) "The PI has provided written assurance that the activities do not unnecessarily duplicate previous experiments."
  - 2.31(d)(1)(iv) "Procedures that may cause more than momentary or slight pain or distress to the animals will:
  - involve in their planning, consultation with the attending veterinarian or his or her designee; [PHS Policy does not specify veterinary consultation]
  - not include paralytics without the use of anesthesia;"
  - 2.31(d)(1)(x) "No animal will be used in more than one major operative procedure from which it is allowed to recover, unless justified for scientific reasons by the principal investigator, in writing..."

- xi 2.33(a)(1) "In the case of a part-time attending veterinarian or consultant arrangements, the formal arrangements shall include a written program of veterinary care and regularly scheduled visits to the research facility." [USDA requirement additional]
- xii 2.31(d)(iv)(C) "Procedures that may cause more than momentary or slight pain or distress to the animals will...not include the use of paralytics without anesthesia."
- xiii 2.32(c) "Humane methods of animal maintenance and experimentation, including the basic needs of each species, proper handling and care for the various species of animals used by the facility, proper pre-procedural and post-procedural care of animals, and aseptic surgical methods and procedures."
- xiv 2.32(c) additional specifications include:
  - "proper use of anesthetics, analgesics, and tranquilizers for any species of animals used by the facility"
  - "methods whereby deficiencies in animal care and treatment are reported, including deficiencies in animal care and treatment reported by any employee of the facility..."
  - "utilization of services (e.g., National Agricultural Library, National Library of Medicine) to provide information on appropriate animal care and use, alternatives to the use of live animals in research, that could prevent unintended and unnecessary duplication of research involving animals, and regarding the intent and requirements of the Act." [USDA training specifications are more detailed than PHS Policy].
- xv Part 3 Subpart A 3.8 "...research facilities must develop, document, and follow an appropriate plan to provide dogs with the opportunity for exercise. In addition the plan must be approved by the attending veterinarian. The plan must provide written standard procedures..."
- xvi Part 3 Subpart D 3.81 "...research facilities must develop, document, and follow an appropriate plan for environment enhancement adequate to promote the psychological well-being of nonhuman primates."
- xvii Part 3 Subpart A 3.6(c)(1) "Each dog housed in a primary enclosure must be provided with a minimum amount of floor space, calculated as follows: (length of dog in inches + 6)<sup>2</sup> /144 = required floor space in square feet)."
  - Part 3 Subpart D 3.80 (b) "Primary enclosures [for nonhuman primates] must meet the minimum space requirements provided in this subpart."
  - In situations where the USDA regulations and the *Guide* differ with respect to space requirements, the larger of the two must be followed.