



Annual Report Review Quick Guide for VMOs

All research registrants are required to file an Annual Report (AR) documenting their animal usage for each fiscal year (Oct 1 – Sept 30). Annual reports are available for pre-review in the files tab in eFile.

Note: Due to online submissions, facilities may not keep a printed copy.

Reporting may be retrospective or prospective

Retrospective:

- Collecting data on individual animals
- Placing each study animal into most appropriate category
- Based on clinical signs of pain and distress

Prospective:

- All animals used for a particular study
- Categorized in the highest applicable pain category
- Based on anticipated pain and distress associated with that activity
- Less labor intensive
- May result in animals being placed in higher category than necessary

The VMO should:

- Review the AR for completeness and accuracy
- Compare the information submitted with other facility documentation and USDA inspection reports
- Ensure that:
 - All animal facilities are reported
 - The number of animals reported is correct
 - Animals are reported in the correct column
 - Column E animals have appropriate explanations
 - Animals used in more than one study are counted only once in the most painful/distressful category
 - When animals have been used/transferred to another facility during the fiscal year, the facility that used the animals in the highest pain category is required to report the animals on their annual report
 - Only regulated animals are reported – **DO NOT report:**
 - Birds, laboratory rats and mice bred for use in research
 - Animals used in field studies (as defined in AWR) or clinical trials under a veterinarian-client-patient relationship
 - Horses or other farm animals used for food or fiber, or for improving animal nutrition, breeding, management, or production efficiency, or improving the quality of food or fiber
 - Animals that a facility holds or uses outside the US or territories and possessions of the US
 - For teaching activities involving veterinary students or veterinary technology students:
 - ✓ **DO report** facility-owned horses and other farm animals used for biomedical or non-agricultural research or teaching, including training of human or veterinary medical personnel in medical methods and procedures such as diagnostic techniques, surgery, anesthesia, and analgesia
 - **DO NOT report:**
 - Faculty- or student-owned animals used for teaching in the presence of their owner
 - Client-owned or shelter animals at spay neuter clinics that are used only in the context of a veterinary-client-patient relationship
 - Animals on working farms used for teaching husbandry procedures at the farm location
- ✓ **DO report** IACUC-approved exceptions not provided for in the AWA
- **DO NOT report** IACUC-approved exemptions provided for in the AWA

Exception Attachments:

Research facilities may make exceptions to the AWA Regulations and Standards when necessary to accomplish the research design. Exceptions must be specified and explained by the Principal Investigator in the research proposal and approved by the IACUC. Additionally, some exceptions also require approval by APHIS before implementation.

DO report exceptions approved by the IACUC under 9 C.F.R. §2.38(k) that are not provided for under the AWA Regulations and Standards, such as:

- Removal of resting platforms from cat enclosures
- Extension of interval for cleaning/sanitization of enclosures
- Keeping animals in 24-hour dark cycle
- Keeping animals in temperatures outside range described in the AWA standards for the relevant species

DO report exceptions approved by Animal Care, such as:

- Approval for use of an animal in more than one major operative procedure from which it is allowed to recover under a special circumstance (9 C.F.R. §2.31(d)(1)(x)(c))
- Exception to the health certificate requirements (9 C.F.R. §2.38(h)(2))
- Temporary tethering of dogs used as the primary enclosure (9 C.F.R. §3.6(c)(4))

DO NOT report exceptions approved by the IACUC that are provided for under the AWA Regulations and Standards such as:

- Approval for use of an animal in more than one major operative procedure from which it is allowed to recover when justified for scientific reasons or required as routine veterinary procedure (9 C.F.R. §2.31(d)(1)(x)(a-b))
- Short-term withholding of food and water from animals (9 C.F.R. §2.38(f)(2)(ii))
- Exemption of an individual nonhuman primate or bird from some or all of the environment enhancement plan (9 C.F.R. §3.81(e)(2) and §3.154(e)(2))
- Any deviation from the methods of euthanasia as defined in the AWA regulations which were justified for scientific reasons, in writing, by the investigator (9 C.F.R. §2.31(d)(1)(xi))
- Exceptions approved by a veterinarian as part of the provision of veterinary care, such as:
 - Animal is fasted for surgery conducted for husbandry reasons
 - Any major operative procedures for medical or colony management purposes (9 C.F.R. §2.31(d)(1)(x)(b))
 - Animals housed in an enclosure that does not meet space requirements for medical reasons while recovering from husbandry or veterinary care-related surgery
- Exceptions to regulations, guidance, or policies than the AWA Regulations and Standards
- Exceptions to *The Guide for the Care and Use of Laboratory Animals*, PHS Policy, internal policies or procedures, etc