Summary:
The Post Approval Review (PAR) program at WSU includes both tabletop reviews and observational reviews that are meant to assist teachers and researchers that use animals in keeping in compliance with WSU policies and federal regulations. PARs are not intended to comprehensively cover all procedures in all protocols but rather to collect information about the agreement between animal use practices as proposed in protocols vs those actually applied to animals. Reviews also provide a framework for IACUC to follow-up on specific events of concern (e.g., unexpected animal death, disease or responses to treatments, etc.) PAR personnel report results to the IACUC, summarizing the tabletop and observational reviews with specific attention to emerging patterns of non-compliance that might require programmatic responses.

Definitions:
Tabletop reviews: Tabletop reviews are conducted in meetings between PAR and research personnel. The reviews consist of systematic verbal reviews of all animal-related aspects of each protocol but do not include direct observation of application of procedures to animals. As a result, discrepancies identified in tabletop review performed prior to initiation of animal use do not constitute non-compliance with animal use policies and may be corrected before any animal use occurs.

Observational reviews: Observational reviews consist of the direct observation of animal procedures as applied to animals by the research staff in the conduct of the research or teaching. As such, discrepancies or non-compliance may require reporting to federal agencies in accordance with WSU polices and federal laws.

Other PAR personnel activities: PAR personnel are available to work with researchers in the development of proposals. PAR personnel may also contribute to investigating specific concerns, discrepancies, or questions at the direction of the IACUC, the Office of Campus Vet, or the Office of Research Assurances.

Activities:
Tabletop reviews:

Requirements:
1) For Pullman and Spokane only, PAR for all newly approved protocols (including both new and 3-year renewals) should be completed within 90 days of protocol approval. For outlying areas, the timeline may be extended up to 180 days. The personnel to be included in tabletop review is at the discretion...
of the PI, although see requirement #2 below. It is preferable that tabletop reviews are completed prior to the initiation of animal research activities. IACUC can extend the 90-day timeframe requirement upon specific request and explanation of the need for delay by the researcher.

2) Tabletop review participation by the PI is required for all PIs who have not previously done so during the previous 5 years. The purpose of PI participation is to update PIs awareness of regulations and other legal requirements that may have changed since their completion of the Principles of Animal Care Training/Occupational Heath Training. PAR personnel will maintain a list of tabletop review participants to identify those who must participate.

3) Tabletop review are intended to foresee potential non-compliance prior to the occurrence of the procedure and prevent incidents of non-compliance.

Failure to comply with these requirements may result in IACUC suspension of animal use approval.

Content: Tabletop reviews are less formal and less structured than observational reviews, and are designed for information gathering and exchange between PAR personnel and researchers. Tabletop reviews include thorough verbal reviews of the animal procedures approved in the protocol as well as inspection of facilities, equipment and supplies. The reviews are intended to identify and solve potential problems before their application in animal use leads to non-compliance with WSU policies. As part of the Tabletop review, PAR personnel will offer advice to the lab regarding common problems identified through PAR of other protocols in order to prevent recurrence of those problems. Tabletop reviews will also provide a setting for PAR personnel to update researchers on regulatory requirements and WSU policies, guidelines, procedures, forms and training requirements that may have changed during the previous period.

Observational reviews:

Requirement: Observational reviews are required only for selected protocols and may include only specific procedures. Selection of protocols / procedures for observational review is based on:

1) random selection of a subset of protocols to audit general compliance with WSU policies,
2) targeting specific protocols that include complex procedures or procedures that based on past experience have increased risk of non-compliance,
3) targeting specific protocols when information received by ORA, OCV, or IACUC concerning possible non-compliance with WSU policies, federal laws or deviations from approved procedures, and
4) PI requests.

Failure to comply with these requirements may result in IACUC suspension of animal use approval.

Content: Observational reviews consist of direct observation of animal procedures and activities included
under an active ASAF by PAR personnel representing the IACUC. A checklist is utilized to systematically review the animal procedures, participating research staff, personnel training, facilities, equipment and supplies for consistency with those approved in the protocol and for compliance with WSU animal use policies. Since the procedures are observed in application to animals, any non-compliance with WSU policies observed during PAR is subject to reporting requirements (e.g., to IACUC or to federal agencies). IACUC will explain the basis of any problems identified, may suggest corrective actions to prevent future non-compliance, but if necessary can suspend approval for animal use.

Other PAR personnel activities:

Requirement: There is no requirement for researchers or teachers with approved animal use protocols to participate in other PAR personnel activities, unless so directed by IACUC.

Content: PAR personnel are available to assist researchers and teachers to ensure that their animal activities are in compliance with WSU polices and relevant federal laws. As such they will assist with development of animal use protocols prior to submission, with researching and resolving any questions that arise during protocol reviews, and with evaluation of facilities, equipment and supplies for consistency with WSU standards. PAR personnel may also assist IACUC with clarifying and confirming information from animal use records, such as confirmation that no animals have been acquired under specific protocols, clarification of animal numbers, the status of exceptions to the Guide, use of SOPs, etc. As part of any visits to lab facilities, PAR personnel will offer advice for correction of possible areas of non-compliance observed during any visit to animal facilities. (Potential non-compliance is not subject to reporting to IACUC; only observed non-compliance in animal activities is required to be reported.)

WSU IACUC Policy #25: Approved by WSU IACUC on 7.27.2016.