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ICYMI: Annual Reports Due to OLAW Dec. 1

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With a little less than a month to go before the new Dec. 1 deadline, just 241 of nearly 900 institutions had filed their annual report of animal care and use program changes to the NIH Office of Laboratory Animal Welfare (OLAW), *RRC* has learned.

Until this year, the deadline for annual reports was Jan. 31. But in an effort to reduce administrative tasks and duplications as required under the 2016 21st Century Cures Act, OLAW moved its reporting period from a calendar to a fiscal year (FY) as recommended.[1]

As a result of the change, OLAW's deadline now coincides with the annual reporting schedule followed by the U.S. Department of Agriculture (USDA). Many institutions follow both the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals and USDA's Animal Welfare Act, depending on the type of animals used.

As OLAW announced on May 21, the change is effective this year.[2] As this is a transition year, however, organizations are filing reports that span only from Jan. 1 to Sept. 30, the end of FY 2020. OLAW established Dec. 1 as the deadline for this partial-FY report. FY 2021 began Oct. 1.

Dec. 1 will remain the deadline for annual reports (assuming it is not changed again).

Report Four Types of Changes

OLAW hosted a webinar on the calendar change and annual reports.[3] Speakers were Neera Gopee, director of OLAW's Division of Policy and Education, Eileen Morgan, director of the Division of Assurances and Jane Na, a senior assurance officer in this division.

Morgan explained some of the logistics of filing an annual report, what it should contain, and highlighted some pandemic-related occurrences that may (or may not) need to be included.

In general, four types of changes, if they occur, must be reported: a change in accreditation status, a change in the person who is the institutional official, a change in membership of the institutional animal care and use committee (IACUC), and changes in the animal care and use program. Program changes made because of the pandemic that are "temporary" do not need to be included, nor do "revisions to your institution's disaster plan unless they update information currently described in your assurance," said Morgan.

Changes in accreditation status mean whether the organization, in the past year, either "achieved" accreditation or was no longer accredited by AAALAC International during the reporting period.

IACUC and program officials will need to review other changes during the reporting period to determine what needs to be reported. As Morgan explained during the webinar, animal care programs may institute changes "intended to be used during the pandemic, or during other situations described in your IACUC-approved

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emergency preparedness documents" that do not have to be reported because they are considered temporary.

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