



## Animal Welfare Inspection Guide

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# Chapter 1. Introduction

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## 1.1. Purpose

The purpose of the Animal Welfare Inspection Guide is to provide an aid for APHIS Animal Care personnel when inspecting USDA licensed and registered facilities.

The Inspection Guide is not a Regulation or Standard and does not rise to the level of policy. It serves as a tool to improve the quality and uniformity of inspections, documentation, and administration of the Animal Care Program.

The Inspection Guide is designed to facilitate the decision-making process. It cannot, and is not intended to, replace the inspector's professional judgment.

The Inspection Guide **summarizes** current regulatory and procedural criteria for USDA licensed/registered facilities, and provides examples of inspection processes for verifying compliance. It does **not** add to, delete from, or change current Regulations or Standards.

## 1.2. Disclaimer

The Animal Welfare Inspection Guide is intended to be a reference document to assist the inspector. The Inspection Guide does not supersede the Animal Welfare Act (AWA), the AWA Regulations and Standards, AC policies and other guidance, the Required Inspection Procedures, standard procedures, or the inspector's professional judgment. All inspection decisions must be justified by applicable sections of the AWA and/or the AWA Regulations and Standards.

## 1.3. Meaning of Must, Should, and May

The words "must," "should," and "may" are used throughout the Guide as follows:

- **Must** is used when the referenced action is **required** by an Animal Care procedure or by the 9 CFR Regulations/Standards
- **Should** is used when the referenced action(s) is:
  - Directed by Animal Care Management:
    - **Strongly recommended**, but **not** specifically required by an Animal Care procedure, or
    - **Strongly recommended**, but **not** specifically required by the Title 9 Code of Federal Regulations (CFR) Regulations/Standards
- **May** is used when the referenced action(s) is **optional**

## 1.4. Meaning of Bulleted and Numbered Lists

Bulleted lists indicate that there is no particular order to follow.



Numbered lists mean that each step is meant to be done sequentially.

## 1.5. Using the Inspection Guide

Review the contents of the Inspection Guide to get a feel for the scope of covered material. Use the Table of Contents in each chapter (mini TOC) to find the needed information. If the Table of Contents is **not** specific enough, turn to the index to find the topic and corresponding page number.

### 1.5.1. Questions or Concerns with the Inspection Guide

If you have questions or concerns about the information in the Inspection Guide, you should contact your Supervisory Animal Care Specialist (SACS).

## 1.6. Inspection Guide Updates

The Animal Care (AC) Unit issues and maintains this Inspection Guide electronically on the AC Website. The Inspection Guide on the Animal Care Website has the most up-to-date information.

Notification of revisions to the Inspection Guide are distributed via the APHIS Stakeholder Registry to anyone who has subscribed to receive Animal Care program updates. To subscribe to updates, register [here](#).

Each update contains the following information:

- Link to access and download the online Inspection Guide
- List of the revised page numbers
- Purpose of the revision



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**DISCLAIMER**

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## 2.1. Required Inspection Procedures

The procedures set forth in this Chapter are procedures that **must** be followed by the inspector when conducting an inspection. If you, the inspector, are unsure of a required procedure, contact your Supervisory Animal Care Specialist (SACS). For more detailed general inspection procedures, refer to Chapter 3.

### 2.1.1. General Requirements

When conducting an inspection, the inspector must follow the general requirements listed below:

- Do **not** enter facilities with locked gates and/or “No Trespassing” signs unless you obtain prior approval from the facility
- If you arrive at the facility and determine that it is **not** appropriate to conduct an inspection, refer to [Deciding Not to Conduct an Inspection](#)
- If you do **not** find anyone at the facility, follow the [Attempted Inspection](#) procedure to complete an Attempted Inspection
- Prior to notifying the facility of your presence, inspectors may observe and record findings **without** being accompanied by a facility representative at facilities that are open to the public. Identify yourself to the licensee immediately after the observation. Before documenting findings on an Inspection Report, the inspector must discuss the findings with a facility representative.
- You **must** be accompanied by the licensee, registrant, or the facility’s designated representative (who **must** be at least 18 years of age)
- Conduct a complete exit interview

## 2.2. Safety

### 2.2.1. Inspector Safety

If you feel you are in imminent danger, promptly leave the area.

The licensee/registrant/applicant is responsible for ensuring the safety of the inspector during the inspection. If you feel at all unsafe, ask the licensee/registrant/applicant to correct the situation. If the licensee/registrant/applicant does anything you feel is unsafe, state that you will leave the facility immediately unless the situation is corrected.

### 2.2.2. Biosafety

In all situations, follow the facility’s visitor biosafety procedures, and/or put on recommended protective clothing, gear, and/or boots.

Inspectors **must**:

- Wear disposable shoe covers during dog kennel inspections
- Wear disposable gloves if it is necessary to touch an animal at all facilities
- Change gloves between animals or between enclosures

For more specific biosafety procedures, see Biosafety Measures in Chapter 3 and the *AC Safety & Health Manual*.

## 2.3. Inspection Steps

Basic steps to follow in conducting a Routine Inspection of a facility include, but are not limited to:

- Review previous Inspection Reports with special attention to Veterinary Care and Direct Noncompliant Items (NCIs) and review previous Teachable Moments and animal inventories
- Review Customer content in ACIS, including but not limited to, status of license, address, comment section and RBIS
- Inspect the animals, premises, building(s), enclosures, equipment, and transportation vehicles/equipment for all pertinent requirements of the Regulations and Standards
- Ensure that all primary enclosures can safely contain the animals
- Review the facility's program of veterinary care, husbandry practices, required records and, when appropriate, the "Exercise Plan for Dogs", and the plan for environmental enhancement for nonhuman primates
- When possible, observe the animal handling techniques of facility personnel
- Consider problems that may occur at other times of the year

### NOTICE

Inspection steps are covered in detail in General Inspection Procedures in Chapter 3.

## 2.4. Inspection Findings

Document inspection findings in the narrative section of the Inspection Report. Do not type any personal identifiable information (PII) or confidential or proprietary business information in the narrative of any Inspection Report, including addresses and phone numbers.

### 2.4.1. No Noncompliant Items (NCIs) Identified

If all items are in compliance, type the following statement on the Inspection Report: "No noncompliant items identified during this inspection."

**For inspections in response to an incident or complaint**, further review may be needed to determine compliance. If you are uncertain whether a noncompliance was involved, do not write an Inspection Report. Discuss the findings with your SACS to determine what action is needed.

**For Site Approval Inspections**, type the following statement on the Inspection Report: “No noncompliant items identified during this inspection. This site is now approved for regulated activity.”

## 2.4.2. Incentives for Identifying, Reporting, Correcting, and Preventing Noncompliance

Animal Care is committed to encouraging dealers, breeders, exhibitors, research facilities, carriers, and intermediate handlers to proactively identify, report, correct, and prevent issues involving animal welfare that may occur at their facilities. We will **not** cite on an Inspection Report a noncompliance that is identified outside of the inspection process if the criteria below are met.

### 2.4.2.1. Criteria

#### Non-Critical Noncompliances

A non-Critical noncompliance will **not** be cited on an Inspection Report if the facility:

- Timely discovers the noncompliance using its own compliance monitoring program (*i.e.*, the facility identifies it on its own and not because of a local, state, federal or third-party inspection program), **AND**
- Immediately takes appropriate corrective action and swiftly establishes measures to prevent recurrence

#### Critical Noncompliances

A Critical noncompliance occurring outside a Routine or Focused Inspection, if it does not constitute a “Repeat” noncompliance, will not be cited on an Inspection Report, if the facility **at the specific site**:

- Has no Repeat or Critical noncompliance on any Inspection Report for that site during the preceding 12 months, **AND**
- Timely discovers the noncompliance using its own compliance monitoring program, **AND**
- Has not voluntarily reported a noncompliance that falls within the same section and subsection of the AWA Regulations and Standards during the preceding 24 months, **AND**
- Immediately takes appropriate corrective action and establishes measures to prevent recurrence, **AND**
- Promptly reports the incident (*i.e.*, generally within 5 days of discovering a noncompliance), orally or in writing, to its Animal Care inspector or any

Animal Care office and cooperates with the inspector as he/she reviews the incident

#### 2.4.2.2. Facility Reporting an Incident

When a facility reports an incident, the inspector will first assess whether it is an AWA noncompliance. The inspector may discuss the outcome with his/her SACS and, as needed, will reach out to the facility operator by phone or visit the facility for additional information.

If the incident does not involve a noncompliance, the inspector will share the assessment with the facility operator and conclude the review.

If the incident does involve a noncompliance and the facility **meets all factors above**, the inspector will:

1. Not document the noncompliance on an Inspection Report, and
2. Follow the instructions for tracking the facility's self-reporting by notifying Program Support with the following information:
  - Licensee/registrant's CID
  - Site number
  - Date of the incident
  - Section number of the noncompliance, and
3. Share the assessment with the facility operator

If the incident does involve a noncompliance and the facility does not meet one or more of the factors above, the inspector will:

1. Document the noncompliance on the Inspection Report during the next inspection, **and**
2. If not corrected and if not a Repeat noncompliance, include a correction date, **or**
3. Indicate that the issue has been corrected on the Inspection Report

#### 2.4.3. Teachable Moments

Teachable Moments are minor NCIs identified during an inspection that meet certain criteria and are not cited on an Inspection Report. Cite any noncompliance that is adversely impacting the health or well-being of an animal on the Inspection Report. If you identify an area that is not a noncompliant item, but you are concerned that it may become one in the future, discuss the concern with the licensee/registrant, but do **not** list it as a teachable moment.



The inspector should decide if each issue observed on an inspection is (in this order):

1. **In compliance**, but an area of concern or discussion topic that is **not** a teachable moment or an NCI. This could be a talking point during the exit discussion.
2. A **Teachable Moment** that meets **all** the following criteria:
  - Is a minor NCI that is not adversely impacting animal welfare, **and**
  - Is not likely to soon become a serious, Direct or other Critical, or Repeat NCI, **and**
  - Is not a Direct or other Critical, **and**
  - The facility/site is willing and able to correct the issue quickly, **and**
  - Was not previously listed as a Teachable Moment or cited at the site within the last two years
3. An **NCI** that should be cited, includes but not limited to, any issue that:
  - Is noncompliant **and** does not meet the criteria to be a Teachable Moment, **or**
  - Was previously cited or identified as a Teachable Moment at the site, **or**
  - Is a Direct or other Critical, **or**
  - Falls under a section of the Regulations or Standards that is already being cited (for example, if you are already citing 3.10 Watering, then anything that falls under this Standard would be cited and would not qualify as a Teachable Moment)

#### 2.4.3.1. Use of Teachable Moments

Teachable Moments are **not** appropriate, and are **not** to be used:

- During a Preliminary or New Site Approval inspection
- At any facility/site with a poor compliance record. For this facility/site, all NCIs **must** be documented on the Inspection Report. A poor compliance record generally includes a facility/site with:
  - Directs or other Criticals, and/or multiple Repeats
  - Citation(s) for refusal of inspection or interference
  - An investigation or recent enforcement action
  - With an open case(s) at OGC (there may be exceptions to this)

#### NOTICE

If you are planning to write up four or more Teachable Moments, contact your SACS to verify whether these are all valid Teachable Moments.

### 2.4.3.2. Special Considerations

Note the following:

- On the first inspection after a license is issued, limit Teachable Moments to recordkeeping and identification issues
- On the first inspection after registration, use of Teachable Moments is appropriate
- Numerous Teachable Moments are a “red flag.” There should be prompt follow-up at these facilities/sites to ensure that compliance is achieved. Therefore, they should be re-inspected or have a courtesy visit within 90 days.

There may be exceptions to these criteria. If you are uncertain about the use of Teachable Moments at a facility/site, contact your SACS.

### 2.4.3.3. Documenting Teachable Moments

The inspector must enter the Teachable Moments into the Teachable Moments screen in ACIS:

- Check the licensee/registrant’s name, customer ID, certificate number and site to make sure the information is correct
- Enter the inspection date, section number of each Teachable Moment, and a brief description of the Teachable Moment

**EXAMPLE** Teachable Moment for 3.1(c):

**Not enough detail:** Dirty den boxes/carpet strings

**Too much detail:** Two pens in the Yorkie area in the top barn (# 3 and 4) have mild staining around the den box opening and should be cleaned more frequently. In 2 pens in the whelping area, # 6 and 8, housing 2 litters of poodles, there are carpet strings/excessive wear on 25% of each carpet. The owner did not want to disturb the new mother for the last couple days but has a plan to replace the whelping carpets with the pups tomorrow.

**Appropriate detail:** Two pens with staining at den box door (needs more frequent cleaning) & 2 whelping boxes with worn carpets need carpets replaced.

Provide one copy of the Teachable Moments to the licensee/registrant, and review in ACIS prior to the next inspection.

### 2.4.4. New NCIs Cited

If an NCI(s) is cited in the Inspection Report narrative, the citation should include the following four parts:

1. The section number and most specific subsection letter/number of each

noncompliance

2. A clear, detailed description of the noncompliance including, when appropriate, the number of animals affected
3. An explanation of why the item is a noncompliance and/or the impact it is having on the animals
4. A correction deadline and a “general” description of what the licensee/registrant should do to correct the problem, and assure that it does not continue/recur. This description should not be worded in such a way that it could be interpreted that AC is mandating how an NCI is going to be corrected. A correction deadline should be appropriate to the severity of the NCI, and unless animal welfare will be put in jeopardy, be realistic as to what the facility can accomplish.

Use “Direct” or “Critical” NCI designation, if appropriate.

#### NOTICE

If a noncompliant item falls into more than one section or subsection, cite the noncompliance **only** in the most applicable section or subsection for each species affected.

### 2.4.5. Repeat NCI

NCIs cited in the same section and subsection as on the last inspection or on the last full inspection if the previous inspection was a Focused Inspection should be designated as a “Repeat”. The “Repeat” designation may also be used if the section and subsection have been cited as a Repeat citation multiple times within the last 3 years, even if it was not cited on the last full inspection. You are responsible for checking the NCI and designating as a “Repeat” if ACIS did not.

**Remember:** Do not include correction dates for Repeat NCIs.

#### NOTICE

On Preliminary Inspections or New Site Approval Inspections, an NCI should **not** be designated as a “Repeat”.

### 2.4.6. Recurring/Chronic NCI

A recurring or chronic noncompliant item is the same or a similar noncompliance that is not found on consecutive inspections, *i.e.*, it is cited on one inspection, corrected by the next inspection, then re-occurs on the third and/or a subsequent inspection.

The recurring noncompliance can be:

- A noncompliance of the same section and subsection of the Regulations or

### Standards

- The same noncompliance with the same section and subsection of the Regulations or Standards but identified for a different species
- The same or a similar noncompliance as cited earlier

Some factors to consider when deciding if the NCI is recurring or chronic include, but are not limited to:

- Have you discussed the development of an active program or system of maintenance with the licensee/registrant?
- Have you discussed the NCI with a person of higher authority at the facility?
- Have you noticed a pattern?
- How far back was the last time the NCI was cited?
- How many inspections have been conducted between the recurrences?
- What is the severity of the NCI?

Use your professional judgment in deciding what action to take, such as:

- Citing the NCI as a new noncompliant item
- Citing the NCI as a Repeat NCI (Include in the description other inspection dates that this NCI has occurred)
- Discussing the NCI with your SACS

### 2.4.7. “Critical” NCI Identified

Critical NCIs are the following:

- Direct NCIs (see description below)
- NCIs that had a serious or severe adverse effect on the health and well-being of the animal. Examples include, but are not limited to:
  - Lack of an attending veterinarian with documented adverse effects on the health or well-being of an animal that require immediate veterinary care
  - Studies involving more than momentary pain and distress to an animal that are conducted at research facilities without an approved protocol and without an appropriate response from the Institutional Animal Care and Use Committee (IACUC)
  - Failure of an IACUC to meet and/or conduct facility and program reviews for a period of time equal to or greater than 1 year resulting in documented, adverse effects on the health or well-being of an animal
  - Actions or inactions of unqualified personnel resulting in documented, adverse effects on the health or well-being of an animal
  - Handling violation that resulted in death or serious injury to an animal

- Escape of an animal resulting in adverse effects on the health or well-being of the animal (NOTE: this includes those situations when an animal is not recovered)
- Inspection refusals and situations where APHIS has been unable to inspect the facility for a significant amount of time due to chronic unavailability for inspections
- Records intentionally falsified to mislead APHIS or another government agency
- NCI resulting in an injury requiring immediate medical attention or death to a human
- Handling an animal in a manner that results in an animal attack or physical contact between an animal and a member of the public, depending on the circumstances, such as where the incident adversely affected the health or well-being of the animal, or the circumstances or practices that caused the incident posed a high risk to the animal and/or the human and could have led to serious injury or death to the animal and/ or the human
- Interference with, harassment, abuse, or threatening to harass or abuse an APHIS official in the course of carrying out his or her duties
- Obtained an animal from any person who is required to be licensed but who does not hold a current, valid, unsuspended license and knew both 1) that the person the animal was obtained from does not hold a license, and 2) that the person was required to hold a license
- Knowingly obtaining random source dogs or cats from a prohibited source, or obtaining animals by use of false pretenses, misrepresentation, or deception
- Engaging in regulated activity with a suspended or revoked license

#### 2.4.8. “Direct” NCI Identified

A “Direct” noncompliance is a Critical noncompliance that is **currently (at the time of the inspection) having a serious or severe adverse** effect on the health and well-being of the animal.

The severity of an NCI at the time of a prior adverse incident has no impact on whether an NCI should be marked as a Critical or a Direct. The determining factor for a Direct is whether it has a **current** serious or severe adverse impact at the time of the inspection.

See [Appendix B—Direct Noncompliance Item \(NCI\) Guidance](#) for examples.

#### NOTICE

On Preliminary Inspections, NCIs should **not** be designated as “Direct.”

### 2.4.9. Correction Date Guidelines

When assigning a correction date, note the following:

- If the “Direct” NCI was corrected at the time of the inspection, a correction date is not necessary
- For an egregious Direct noncompliance, the correction date should be very short, *e.g.*, 1 day, and the reinspection should occur within a short period of time after the correction date to verify the correction and ensure animal welfare
- The correction deadline for a “Direct” noncompliance should never exceed 14 days

A complete or focused reinspection of a facility with a “Direct” NCI **must** be completed no more than 45 days after the date of the inspection. You must conduct a reinspection at the facility even if the “Direct” NCI was corrected during the inspection.

### 2.4.10. Direct NCI on a New Site Approval Inspection

If a Direct NCI is identified on a New Site Approval inspection:

- Designate the NCI as a “Direct”, and
- Assign an appropriate correction date, and
- Inform the licensee that an inspection will be conducted on or after the correction date to see if the Direct NCI was corrected

If the licensee contacts the inspector for another New Site Approval inspection prior to the Direct NCI correction date, document the Direct NCI as corrected in the Inspection Report for that inspection.

### 2.4.11. “Veterinary Care Direct” NCI Identified

**Not every veterinary care NCI affecting an animal is a Direct.**

A veterinary care noncompliance is a “Direct” if:

- The noncompliance is **currently (at the time of the inspection) having a serious or severe adverse** effect on the health and well-being of the animal, **and**
- The licensee/registrant has **not** sought veterinary care for the animal prior to the inspection

When citing a veterinary care “Direct” NCI:

- Include the ID of the animal if applicable and a description of the animal (species, breed, color, sex, age, etc.) in the NCI narrative
- Take a photo of the entire animal and a photo(s) and/or video of the area cited in the NCI

- A correction date, if given, should be very short, *e.g.*, 1 day
- If the animal(s) has been taken to the veterinarian and care has been provided, including humane euthanasia when directed by the veterinarian, prior to your completion of the inspection, note in the narrative that the animal(s) was evaluated and treated by a veterinarian

Do **not** interfere with the licensee obtaining immediate veterinary care for an animal if needed.

For a **corrected** veterinary care Direct:

- Note that the Direct was corrected on the original Inspection Report if corrected at the time of the inspection, OR
- Note that the Direct was corrected on the follow up Inspection Report

### 2.4.12. Handwritten or “Word” Inspection Reports

If you are unable to complete the Inspection Report in ACIS, then complete the Word Template on your laptop or handwrite a report. In the event that your laptop is unavailable, carry several hard copies of the template.

If you completed a handwritten or Word Inspection Report:

- You and the licensee/registrant should sign two copies and leave one copy with the licensee/registrant
- Enter the Inspection Report into ACIS as soon as possible but no later than 5 business days after the inspection
- On the ACIS Inspection Report:
  - Do **not** put a statement that this is electronic or transcribed version of the original Inspection Report
  - It is not necessary to change the “prepared by” date in ACIS even though it will not match the date on the handwritten or Word Inspection Report. The original Inspection Report will be available in the event of questions.
- Mail the hard copy of the original Inspection Report to the Fort Collins or Raleigh office, as appropriate
- If the ACIS Inspection Report is exactly the same as the handwritten or Word Inspection Report except for the “prepared by” date, a copy does **not** have to be sent to the licensee/registrant

### 2.4.13. Airport Inspections

The inspector is **not** required to obtain a signature and deliver airline Inspection Reports with no NCIs at airports at the time of the inspection. The Fort Collins or Raleigh office (as appropriate) will mail these **no NCI** Inspection Reports to the appropriate airline corporate office.

Leave the Received By and Title lines blank on the Inspection Report.

Send a copy of the Inspection Report(s) with a note to send to the airline(s) attached to the Inspection Report or in the email to the attention of the Fort Collins or Raleigh office (as appropriate).

## 2.5. Inspection Photographs

### 2.5.1. Photographs/Videos Documenting Noncompliances

Photographs or videos **must** be taken to document photographable noncompliant item(s) in all of the following situations and **only** in these situations unless instructed otherwise by your SACS:

- Direct, Criticals, or Repeats NCIs (if photographable)
- NCIs cited at a facility with an ongoing Investigative and Enforcement Services (IES) investigation and/or case pending with the Office of the General Counsel
- NCIs where there is a disagreement between you and the licensee/registrant and the licensee/registrant has indicated he/she will, or is likely to, appeal the citation

#### NOTICE

A Prelicense Inspection cannot be appealed. Do **not** take any photographs at a Prelicense Inspection.

- All NCIs cited at commercial airline carrier inspections
- Veterinary Care NCIs involving animals:
  - Photograph(s) or video(s) every animal covered by the citation
  - Photograph(s) or video(s) the entire animal for identification purposes and photo(s) of the issue cited in the NCI
  - Photograph labels must clearly identify the animal

For veterinary care citations, take photograph(s) or video(s) of every animal covered by the citation, including matted dogs.

For facility citations, such as pens with broken wire, take a few representative photographs to prove that there was an NCI but not a photograph of every cage or area.

Photocopy, scan, or photograph **records** that:

- Document a Repeat, Direct, Critical, or transportation noncompliant item
- May be fraudulent

If copies of research facility records, protocols, or IACUC minutes are going to be photographed and removed from the facility, the facility will be afforded the



opportunity to review/redact the records for proprietary business information. The inspector should allow the facility 24 to 48 hours for this purpose.

Label and upload all photograph(s) using the jpeg format or video(s) that are to be retained into ACIS as soon as possible, but **no** later than 2 weeks after the inspection. Delete any inspection photos that you are not uploading into ACIS in connection with an NCI. Do not store or save unused photos.

SACS may have inspectors take additional photographs, in addition to the required photos listed above.

### **2.5.2. Showing Photos during Exit Interview**

The inspector should show the photographs taken during the inspection to the licensee/registrant on his/her laptop at the time of the exit interview. This is to be used as a tool to clarify an NCI(s) for the licensee/registrant and to create an open dialog around correction.

### **2.5.3. Licensee/Registrant Requesting Photographs**

A licensee/registrant may request a copy of the photographs taken during the inspection process. If the licensee/registrant requests a copy of any photograph(s), the inspector should email the requested photographs that were uploaded into ACIS to the licensee/registrant, after they have been uploaded. If the number of photos requested cannot be reasonably emailed due to the size or quantity of the photographs, a flash drive containing the remaining photographs should be supplied by the inspector.

For licensees/registrants without email access, a reasonable number of photographs can be printed by the inspector (no more than three pages of photos). If more photographs were taken than can be reasonably printed by the inspector, a flash drive containing the remaining photographs should be supplied by the inspector. If other reasonable accommodations are needed, the individual accommodation is to be approved by the inspector's SACS prior to distribution of the photographs.

Only photographs that have been uploaded to ACIS should be supplied by the inspectors to the licensee/registrant.

## **2.6. Inspection Inventory**

The animal inventory is an important component of the inspection. This is the formal record of how many animals of each species Animal Care personnel observed/inspected during inspection. It is important that this is accurate and care must be taken both during inspection and when entering this information into ACIS.

**NOTICE**

Because inventory is a record of what Animal Care inspectors observed, the inventory included with the report may be different than the total number of animals maintained by the facility. For example, differences can occur when conducting a Focused Inspection on a few individual animals or specific taxa only, or if there are animals away from the facility during the inspection (*e.g.*, those away on traveling exhibition or animals at an off-site veterinary clinic for care).

**2.6.1. Before the Inspection**

- Review and print or download a copy of the last inspection inventory prior to going to the facility
- Familiarize yourself with the natural history and specific needs of any animals that you are likely to encounter on that inspection (if you aren't already)

**2.6.2. During the Inspection****2.6.2.1. Countable Species**

Whenever possible, inspectors must count the numbers of animals for each species. Make sure to keep accurate notes throughout the inspection. For species that are countable, make sure you compare your numbers to the facility's record of animals on hand.

If there are any discrepancies make sure to ask the facility representative about those differences. It could be that one or more animals are currently away from the facility, but this may also indicate an error in their record-keeping or in the inspector's count.

Compare the current record of animals on hand to the prior inventory. If there are additions or animals that are missing, make sure to carefully check the facility's acquisition/disposition records to make sure those animals are accounted for.

**2.6.2.2. Difficult to Count Species**

Some animals are difficult to count during inspection. This can occur when:

- Animals are kept in large groups (*e.g.*, herding animals)
- Species that are prone to piling on top of one another (*e.g.*, harem housing for guinea pigs)
- Nocturnal animals in dimly lit enclosures

In these cases inspectors should attempt to count animals during the inspection and keep notes as normally required. Following the physical inspection:

- Evaluate the facility's method of record keeping and compare your numbers to the facility's numbers of animals on hand
- Some discrepancy between these two numbers is likely due to the difficulty in counting
- The inspector's numbers and the facility's numbers should be within 10% of each other
- If there is **greater than a 10% difference**, the inspector should ask the facility follow-up questions, then:
  - If the inspector is satisfied with the facility's explanation, the facility's animal numbers should be recorded on the inventory
  - If the facility and inspector cannot come to agreement on the inventory numbers, the inspector should contact his/her SACS for instructions on how to resolve the disagreement

### 2.6.2.3. Species/Circumstances where Accurate Counts are Impossible

Occasionally animals are not able to be accurately counted during the inspection. For example this can occur when:

- There are nocturnal animals in nest boxes or hide areas
- There are burrowing animals that are all underground during inspection
- There are large numbers of the same species in expansive habitats (*e.g.*, fallow deer at some drive through parks)

In these circumstances, the animals can and should be included on the inventory provided that they were included in the inspection. As long as the enclosure, diet, food storage/prep areas, veterinary care records, etc., were inspected, those animals should be included on the inventory.

Under these circumstances, the inspector should closely evaluate the facility's required records, including records of acquisition, disposition, and animals on hand. If the facility records are accurate and contain all of the required information, the numbers of animals on hand provided by the facility should be used for inventory purposes.

If the facility does not have the required records, or the records they have are missing required information, this should be documented either as a teachable moment or as a noncompliance on the Inspection Report, consistent with the guidance on Teachable Moments. When this occurs, you should estimate the animal numbers present and use that number on the inventory; it should be made clear in the teachable moment or on the Inspection Report that the numbers were estimated.

Also, if none of the individual animals could be observed during the inspection, consider keeping a brief note in your field file. If that occurs on multiple consecutive inspections, consider ways that you can increase your chances of visualizing animals during the inspection. That may involve inspecting at a

different time of year (*e.g.*, hibernating animals) or coming back to that enclosure later in the day (*e.g.*, for nocturnal animals). Your SACS may have additional suggestions relevant to a particular facility.

#### **2.6.2.4. Inventory on Focused Inspections**

When conducting a Focused Inspection, only list those species and animal counts that you inspected on the inventory. Either enter a new inventory for the Focused Inspection or copy the previous inventory and delete the species not inspected. Do not copy the previous animal inventory and leave species that weren't inspected. For inspections that are focused on records only, your inventory should report no animals.

#### **2.6.3. After the Inspection**

The inspector is required:

- To enter the animal inventory into ACIS
- To discuss and agree upon animal numbers with the licensee/registrant during the exit interview
- To provide the animal inventory list as part of the Inspection Report
- The inventory must be entered into ACIS and finalized. This should be completed as soon as possible and must be completed no later 5 days following the conclusion of the inspection. SACS may grant an extension to this deadline if there are extenuating circumstances preventing timely finalization of inventory.

##### **2.6.3.1. Difficulty Locating a Species in ACIS**

If you are having trouble locating a species in ACIS, here are a few tips:

- Check your spelling. Spelling matters here. Check the spelling and if that doesn't work, try varying any hyphens or apostrophes in the name
- Try searching alternate common names. For example many licensees still use the outdated name "Coatimundi" when referencing the South American Coati (*Nasua Nasua*). If you search Coatimundi, ACIS will not return records.
- Search partial names
- Search the scientific name (genus and/or species)
- If you still can't find a particular species in ACIS, reach out to your SACS for assistance. If together you still can't find it, reach out to the Animal Welfare Operations (AWO) Inventory Support Team. If it turns out that the species is currently missing from ACIS, this team will need to request the addition.

## 2.7. Exit Interview

An exit interview is **required** for all inspections (complete or focused), unless your personal safety is at risk, or harassment, verbal abuse, or other factors are interfering with the inspection process.

Conduct an in-person exit interview with the draft Inspection Report in hand if the licensee/registrant requests the opportunity to review the NCI narrative(s) prior to finalization of the Inspection Report.

Take as much time as necessary during the exit interview to:

- Discuss animal welfare and the AWA Regulations and Standards with the licensee/registrant
- Summarize everything that occurred during the inspection, and provide the licensee or registrant an opportunity to present additional information that may influence the determination of compliance
- Discuss each noncompliant item in detail with the licensee/registrant or facility representative. If the licensee or registrant provides information or documentation that influences an NCI on the current version of the Inspection Report, modify the report to accurately reflect the compliance of the facility before it is issued.
- Show the licensee or registrant any photos/videos taken during the inspection to communicate exactly what the noncompliance is (See [Licensee/Registrant Requesting Photographs](#))
- Inquire about what the licensee/registrant might consider doing to correct the problem and discuss options with him/her (if asked)
- Discuss the animal inventory and animal counts with the licensee. Ensure all species and numbers are correct prior to finalizing the inventory report and provide a copy of the finalized inventory report to the licensee with the Inspection Report.

Unless an exit interview could not be completed (for example, it is unsafe or there may not be an exit interview for a carrier inspection at an airport), a statement must be included on all Inspection Reports stating, “This inspection and exit interview were conducted with \_\_\_\_.” Do **not** use actual names of facility representative or personnel, only titles. ACIS will put the names of other AC inspectors on the team into the report for you. If you are accompanied by other government personnel (*e.g.*, IES, Security), you do not need to include their names on the report.

### NOTICE

If the Inspection Report is to be delivered by email or certified mail, you must still conduct a detailed and thorough exit interview. Any item that you will be citing on the Inspection Report **must** be discussed during the exit interview.

## 2.8. Delivery of the Inspection Report

You must hand deliver Inspection Reports with Direct NCIs unless you obtain SACS approval to do otherwise.

Hand delivery is preferred for all inspections except for Attempted Inspections. However, Inspection Reports may be delivered via email or certified mail, if necessary.

First Attempted Inspection Reports may be sent by regular first class mail or email. Second Repeat Attempted Inspection Reports must be sent by email or certified mail.

For **all** delivery methods, the Inspection Report **must** be delivered or sent to the facility as soon as possible but no later than 5 business days after the inspection. Obtain SACS approval if you **cannot** meet this deadline.

**If sent by email**, the inspector **must** convert the Inspection Report to a PDF so it cannot be altered and **must** request an email reply verifying receipt of the Inspection Report by the facility. The email receipt **must** be scanned into ACIS along with the original Inspection Report. If an email reply is **not** received within 5 business days from the day it was sent, the inspector **must** deliver the report by another method so that receipt can be verified. There is no need to amend the report to remove the email delivery statement. The new delivery method type and “received by” date must be handwritten on the copies of the Inspection Report that will be delivered to the facility and scanned into ACIS.

When sending an Inspection Report by **certified mail**, type the certified mail number in the name line and the statement “Sent by certified mail” in the title line. Be sure to include the CID # on the Green Card and scan the -Green Card into ACIS

### 2.8.1. Signature on the Inspection Report

The inspector should sign the Inspection Report and request that the licensee/registrant or his/her representative sign the Inspection Report, as well. The signature of the licensee/registrant or his/her representative certifies that the person received a copy of the Inspection Report. It does not necessarily mean that the person agrees with the findings of the inspection.

If the facility representative declines to sign the Inspection Report:

- Leave the signature block blank, and
- Leave a copy of the Inspection Report with the representative, and
- Send a copy via certified mail

Explain the circumstances of the representative’s decision to decline to sign the Inspection Report in a memo to your SACS, including who said what to whom, when, where, and how, using specific language, **and** scan a copy into ACIS.

Any licensee/registrant with a disagreement about the inspection findings may

follow the inspection appeals process. The inspection appeals process is described in a Tech Note on the AC Website:

[https://www.aphis.usda.gov/publications/animal\\_welfare/2017/AC-Tech-Note-Inspection-Report-Appeals-Process.pdf](https://www.aphis.usda.gov/publications/animal_welfare/2017/AC-Tech-Note-Inspection-Report-Appeals-Process.pdf)

## 2.9. ACI Team Inspection with a VMO after a Veterinary Care Direct

After a veterinary care Direct is identified on an inspection by an ACI:

- A VMO **must** be present on the next full inspection of the facility
- The ACI may choose to take a VMO on the Focused Inspection to follow up on the Direct veterinary care NCI

## 2.10. Risk Based Inspection System (RBIS)

You **must** inspect the following facilities on or before the deadline date given in ACIS:

- Facilities with Direct NCIs
- Facilities with High Inspection Frequency (HIF)
- Research facilities which **must** be inspected at least once every fiscal year

If you cannot, contact your SACS prior to the deadline so that another inspector can be assigned to conduct the inspection.

## 2.11. Deciding Not to Conduct an Inspection

In some circumstances when you arrive at the facility, you may determine that it is not appropriate to conduct an inspection. If you are unsure whether you should conduct an inspection, or if this is a recurring issue at this facility, contact your SACS. If you do not conduct an inspection, document this visit on your Time and Attendance Report. Do not cite it as an Attempted Inspection.

**Examples** of situations where you should not conduct an inspection include, but are not limited to:

- Contagious disease in the animal facility such as parvovirus (you may want to contact the attending veterinarian for more information)
- Illness of the licensee with no other responsible person available
- Personal events such as weddings, funerals, doctor/veterinarian appointments, or family emergencies
- Religious holidays

## 2.12. Attempted Inspection

An Attempted Inspection occurs when an authorized person is **not** available to

accompany the inspector, and **no** inspection is conducted.

If an authorized person is **not** present at the facility, call the phone number(s) provided by the licensee/registrant, and determine if an authorized person can be at the facility within 30 minutes or a reasonable amount of time. Wait for the agreed upon amount of time and if the authorized person or a designee does **not** arrive, leave the facility and cite section 2.126(b) for licensees, carriers and intermediate handlers and section 2.38(b) for registered research facilities. In the citation narrative, write a brief description of what you did to contact the licensee/registrant, *e.g.*, called all the contact numbers provided, knocked at the door, waited 30 minutes, etc.

Send the Inspection Report for the first citation of an Attempted Inspection by regular mail or email only. Send Inspection Reports citing Repeat Attempted Inspections to the licensee or registrant by **both** regular and certified mail or email. **Convert any emailed Inspection Report to a PDF so that it cannot be altered.**

If there is an adult at the facility, they can sign the Attempted Inspection Report and give it to the licensee.

If the inspector returns to conduct an inspection the next day, the licensee can sign the Attempted Inspection Report from the previous day at that time.

If there is more than 1 day between the attempt and the inspection, send the report as above.

### 2.12.1. Optimal Hours of Inspection

Identify the optimal hours of inspection for:

- Licensee who is not open to the public during normal business hours
- Licensees/registrants who have had two consecutive Attempted Inspections or three Attempted Inspections in 2 years

Record the optimal hours in the ACIS "Customer" tab comment box. Optimal hours are generally 4 hour blocks of time during daylight hours three days per week. This is not, however, a requirement. Use your professional judgment to consider two entire days per week, or another set of optimal hours, that will facilitate the unannounced inspection. If, after discussion, the suggested optimal hours still seem unworkable, contact your SACS.

If the licensee is **not** at home during the designated hours, cite as an Attempted Inspection as above. If you stop by the facility at other times and the licensee is **not** home, record the visit on your Time and Attendance sheet, but do **not** cite as an Attempted Inspection.

### 2.12.2. Optimal Hours Form Letter

Use the [Optimal Hours Form Letter](#) (OHFL) when the inspector and the licensee/registrant cannot agree on acceptable hours of inspection. **Prior to**



**sending the letter**, you **must** discuss the problem with your SACS.

If it is determined that the OHFL is appropriate, the inspector should:

- Complete the letter
- Note in the licensee/registrant's ACIS "Customer" tab comment box that the OHFL was sent and the date
- Send a copy of the letter to the Fort Collins or Raleigh office, as appropriate
- Send the letter to the licensee/registrant by certified, return receipt mail

If the licensee/registrant later contacts the inspector with acceptable hours of inspection, you should record the optimal hours in the ACIS "Customer" tab comment box.

## 2.13. Prelicense Inspection

An applicant's facility **must** meet all applicable Regulations and Standards to obtain a license. Prelicense Inspections are scheduled at a time agreeable to the applicant and the inspector. Do **not** conduct a Prelicense Inspection until all of the applicant's paperwork has been processed by the Program Section and the inspector has been informed that the applicant may be inspected.

In addition to determining if a facility is in full compliance, Prelicense Inspections are the best time to help the applicant learn more about the AWA Regulations and Standards **using the enhanced prelicense process**. Required written records (*e.g.*, a written program of veterinary care for part-time attending veterinarian or consultant arrangements and a plan for environmental enhancement for nonhuman primates) **must** be completed and inspected during a Prelicense Inspection to consider the facility in compliance. There **must** be a written record of animals on hand with as much of the required information completed as possible.

### 2.13.1. Dealers

On every Prelicense Inspection that includes dogs, the inspector **must**:

- Have the applicant pull all dogs showing signs of medical issues so that you can evaluate whether veterinary attention is needed and/or is already being provided, **and**
- Also select ten percent of the remaining dogs (up to a maximum of 10 dogs) for the applicant to pull so that you can look for medical issues associated with their mouths, teeth, ears, eyes, skin, general condition, etc. Do not just focus on one area; take the opportunity to look at the entire dog for medical issues.

**Remember**, wear a new pair of gloves before touching a dog(s) in a different enclosure.

If you identify a veterinary care issue that would normally be cited during a

Routine Inspection, it **must** be cited on the Inspection Report for the Prelicense Inspection.

### 2.13.2. Facility Not in Full Compliance

If the facility is **not** in full compliance, cite all noncompliant items using the first three components of the four-part citation description found in [New NCIs Cited](#) but do **not** give correction dates.

#### NOTICE

Do **not** designate any noncompliance as a Direct or Repeat.

See Prelicense Inspection in Chapter 4 for the statements to include after the exit interview statement.

If a third Prelicense Inspection is necessary, a second inspector (ACI or VMO), a Compliance Specialist or a SACS **must** be present during the inspection.

### 2.13.3. Facility in Full Compliance

If the facility is in full compliance, generate a no noncompliance Inspection Report and include the statements in the narrative as follows:

No non-compliant items identified during this inspection.

Inspection and exit interview conducted with \_\_\_\_\_. (See [Exit Interview](#))

See Prelicense Inspection in Chapter 4 for the statements to include after the exit interview statement.

## 2.14. Refusal of Inspection

If a licensee or registrant refuses to allow an inspection, ensure that you have clearly identified yourself as a USDA Animal Care inspector, and that the licensee/registrant is aware of the serious nature of this noncompliance of AWA Regulations. If you are sure that you are safe, ask this question **once**, “Are you refusing to allow the inspection?” If the licensee/registrant still refuses to allow an inspection, leave the premises and complete an Inspection Report designating this as a Routine Inspection. Cite section 2.126(a) for licensees or registered transporters, section 2.38(b) for registered research facilities.

Document the specific circumstances of the refusal in the Inspection Report narrative: be specific as to date, time, and the identification of the person who refused to allow the inspection. Include any pertinent statements made by the licensee or registrant.

If two or more APHIS officials are present for the inspection and one is denied entry, document this as a refusal of inspection. Do **not** conduct an inspection.

Send the Inspection Report for a refusal to the licensee or registrant by both

regular and certified mail.

Communicate any “refusal to allow inspection” with your SACS to develop a plan for a follow-up inspection.

## 2.15. Interference

If you are being harassed, abused (including verbally abused), or interfered with in the course of carrying out an inspection, inform the licensee or registrant that the inspection can only continue if the harassment, abuse, or interference stops. If the activity or behavior continues, **you must discontinue** the inspection process and leave the premises and cite it.

Write a Routine Inspection Report citing section 2.4 for licensees, section 2.25(c) for registered transporters, or section 2.30(d) for registered research facilities. In the narrative, be specific as to date, time, and the identification of the person(s) involved, including details of the harassment and/or verbal abuse, and/or interference.

Send the Inspection Report to the licensee or registrant by regular and certified mail. For any “interference with the inspection,” communicate with your SACS to develop a plan for follow-up inspections.

### SAFETY

If you are being threatened, follow procedures to ensure your safety including, but not limited to, leaving the premises and calling 911, if necessary. After your personal safety is ensured, consult with your SACS with regard to future steps.

## 2.16. Correcting, Rescinding, and Amending an Inspection Report and/or Inventory

Correcting, rescinding, or amending an Inspection Report and/or Inventory is done on a case-by-case basis under the direction of your SACS or the Animal Welfare Operations leadership team.

### 2.16.1. Correcting an Inspection Report and/or Inventory

An Inspection Report and/or Inventory that has been finalized **and a copy has not been given to the licensee/registrant yet**, may be corrected by requesting through your SACS or SOTW that the Inspection Report and/or Inventory be reset to draft.

### 2.16.2. Rescinding and Amending an Inspection Report and/or Inventory

An Inspection Report and/or Inventory that has been finalized **and a copy has been given to the licensee/registrant**, may be corrected by requesting through

your SACS or SOTW that the Inspection Report and/or Inventory be rescinded so it can be amended.

#### NOTICE

You may **not** add a Direct, Critical, or Repeat designation or an additional citation to an Inspection Report after it has been given to the licensee or registrant.

For an amended Inspection Report and/or Inventory:

- Do not put any statement on the Inspection Report that this is an amended Inspection Report
- Complete the Amended Inspection Report Letter using the template in Appendix A - [Amended Inspection Report Letter](#)
- Deliver the amended Inspection Report with the Inventory and Letter to the licensee/registrant using the approved methods of delivery
- If only the Inventory is amended, send a copy of the Inspection Report with the Amended Inventory and Letter

## 2.17. Inspection Report and Teachable Moments Review

The SACS or his/her designee **must** review the Inspection Reports and Teachable Moments in the SACS Review section of ACIS as soon as possible but no longer than 21 days from the date the report is finalized.

### 2.17.1. Inspection Report Review

Review Inspection Reports to ensure that, at a minimum:

- All required information is included and correct
- All subparts of the citation are included in the narrative
- NCI narrative provides facts supporting each element of the requirement, is objective and free of significant errors
- Directs, Criticals and Repeats are designated correctly
- The exit interview statement is included in the narrative section
- No information that should not be on the Inspection Report is in the narrative
- Photographs/videos are included if required
- Animal Inventory is included

Use the [Inspection Report Review Checklist](#) in Appendix A as a guideline for reviewing Inspection Reports.

### **2.17.2. Teachable Moment Review**

Review the Teachable Moments to ensure that, at a minimum:

- The facility meets the criteria for the use of Teachable Moments
- The NCI is appropriate to be a Teachable Moment
- The description of the Teachable Moment is appropriate
- The Teachable Moment Form is completed properly

Use the [Teachable Moments Review Checklist](#) in Appendix A as a guideline for reviewing Teachable Moments.



# Chapter 3. General Inspection Procedures

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**DISCLAIMER**

The Animal Welfare Inspection Guide is intended to be a reference document to assist the inspector. The Inspection Guide does not supersede the Animal Welfare Act (AWA), the AWA Regulations and Standards, AC policies and other guidance, the Required Inspection Procedures, standard procedures, or the inspector's professional judgment. All inspection decisions must be justified by applicable sections of the AWA and/or the AWA Regulations and Standards.



## 3.1. Preparing for the Inspection

Review the appropriate information in order to conduct a thorough inspection.

Prior to the inspection, review the following information:

- Applicable sections of the Regulations and Standards
- Applicable sections of the Required Inspection Procedures, Specific Types of Inspections, and other sections of this Inspection Guide
- Pending investigations and prior enforcement actions, if any
- Facility's past Inspection Reports
- Animal Inventory
- Optimal Hours of inspection
- Other relevant resources (such as species specific guidance if a facility holds a unique species)

### NOTICE

For forms and worksheets that you may need during or after the inspection, see [Appendix A. Forms and Worksheets](#).

## 3.2. Conducting the Inspection

Each inspector must develop a consistent method of conducting inspections to ensure that his/her inspections are thorough, accurate, and in accord with this Inspection Guide and the AWA and the Regulations and Standards.

### 3.2.1. General Information

The basic steps for conducting an inspection are outlined below. However, the exact sequence for conducting the inspection is at the discretion of the individual inspector.

- You should inspect a facility at different times of the year if possible, rather than inspecting the same month or season every year
- Upon arrival at the facility, be alert for unsafe conditions
- Prior to conducting the actual inspection:
  - Contact the licensee/registrant or authorized representative
  - Introduce yourself in a professional manner
  - State the purpose for the visit
  - Show your USDA badge and ID

- Provide a business card, if appropriate

#### NOTICE

Do **not** allow anyone to photograph or photocopy your government ID. If a facility wishes to verify your identity as a USDA inspector, they may call the Animal Care office in Fort Collins or Raleigh. If you are denied access to a facility or not able to conduct an inspection for because a facility requires a photocopy of your government ID, this should be considered a refusal of inspection and cited on an Inspection Report.

- If the facility, e.g., zoo, theme park or wild animal park, has an admission gate or ticket window:
  - Go to the admission gate/ticket window
  - Identify yourself in a professional manner
  - State the purpose of your visit
  - Show your USDA badge and ID
- At most facilities, you will **not** be required to pay admission. However, if an admission fee is requested, you can ask to speak to someone in management. If you need to pay admission, contact your SACS for approval, then charge the admission fee on your Purchase Visa (preferable), or pay the fee yourself and you will be reimbursed.

#### NOTICE

Under certain circumstances, you may want to observe the exhibition, facility, or facility personnel prior to announcing your presence. If you need to pay the entrance fee, contact your SACS or SOTW for approval, then charge the admission fee to your Purchase VISA (preferable) or pay the fee yourself and you will be reimbursed. The observation should be done from areas accessible to the general public. Immediately after observing the exhibition/facility/personnel, you **must** announce yourself to the licensee/registrant or facility representative and arrange to complete the inspection and address any findings that you observed prior to announcing yourself.

- If you do **not** find anyone at the facility, follow procedures for an Attempted Inspection (see Attempted Inspection in Chapter 2)
- For Traveling Exhibitor Inspections, see Traveling Exhibitor Inspection

### 3.2.2. Inspection on Native American Land

If you conduct an inspection or conduct an inspection for unlicensed activity on

Native American lands, contact the tribal leader prior to conducting the inspection to explain the purpose of your visit.

If the tribal leader refuses to allow you to conduct the inspection, leave the land, and contact your SACS or your Assistant Director.

### 3.2.3. Biosafety Measures

Biosafety measures when conducting an inspection include, but are not limited to the items listed in Table 3-1. Follow the facility’s biosafety procedures. If the facility has no procedures or procedures that are less protective than the recommended biosafety measures, put on the recommended protective clothing, gear, and/or boots.

**Table 3-1. Biosafety Measures When Conducting an Inspection**

If you are inspecting:	Then wear:
Dogs or cats	Disposable shoe covers (required) Disposable gloves (required if touching any animal; change gloves between each animal or cage) Ear plugs (optional but highly recommended for dog kennels) Coveralls (optional)
Elephants (TB positive or TB suspect)	Respirator (level N95 or better)
Macaques	Respirator (level N95 or better) is required if within 5 feet or less Disposable shoe covers Coveralls, preferably disposable Full face shield and eye protection, such as safety glasses or goggles Disposable gloves
Other nonhuman primates	Respirator (level N95 or better when nonhuman primates and other animals are suspected to be infected with TB indoors, or within 5 feet or less outdoors)

### 3.2.4. Animal Inspection – Specific Guidance

#### 3.2.4.1. General Information

Basic steps or procedures when conducting an inspection of the animals include, but are **not** limited to:

- Approach all animals quietly and cautiously

- Ask if there are any other animals that you have **not** seen, such as those in quarantine, isolation, holding areas, off-site, or on loan or lease
- Be alert for escape routes for yourself in case of a dangerous situation
- Before approaching an animal, ask the facility representative:
  - About the temperament of the animal
  - If the animal is approachable
  - Where is the safest place to be
- Let the person accompanying you open and close gates and doors to prevent escapes
- Always have the person accompanying you go through the gate or door first as a safety measure
- Make sure all animals are safely secured

#### NOTICE

You and the facility representative should work together to ensure your safety around animals during an inspection. If you feel unsafe, ask the facility representative or designated authorized representative to correct the situation. If you feel you are in danger, safely leave the area.

- Observe handling techniques of personnel during prelicense inspections and during inspections of licensed and registered facilities, and note that:
  - For licensed/registered facilities, the inspector **should** evaluate the handling experience and qualifications of the personnel
  - For applicants:
    - Inspector should evaluate the handling seen during the prelicense inspection
    - The inspector **should consult** with his/her SACS and the appropriate Species Specialist if there are concerns about the applicant's handling techniques and experience
- Observe the animals for their health and well-being:
  - Avoid handling the animals unnecessarily
  - Do **not** engage in diagnostic procedures
  - If a dangerous animal needs close evaluation, ask the facility to make arrangements for the animal to be examined by a veterinarian
  - If you need to closely examine a non-dangerous animal and it can be done safely, have the owner or handler restrain the animal
  - Wear disposable gloves if you **must** handle any animals
- Stay behind or next to the facility representative

- Review husbandry practices

#### NOTICE

Newborn and infant non-domestic cats 4 weeks (28 days) of age or younger should be housed in the controlled environment of a heated, clean and sheltered enclosure (such as a nursery), or in a clean, sheltered enclosure with the mother and any healthy siblings.

- Review supervisor and employee experience and training and ensure the facility has a sufficient number of employees [3.12; 3.32; 3.57; 3.85; 3.108; 3.132]
- Review veterinary care practices and records as appropriate [2.40]
- Review public contact procedures [2.131]:
  - Newborn and infant nondomestic cats four weeks (28 days) of age or younger (neonate or neonatal) have special handling and husbandry needs. Among other things, the AWA Regulations require licensees to ensure that they are handled safely and protected from harm. Because of their limited immunity, their health is at risk if they are exposed to other animals or offered for public contact. For more information, please read Tech Note, [Handling and Husbandry for Neonatal Nondomestic Cats](#).
  - For regulatory purposes, AC generally considers big cats to become juveniles when they reach roughly 12 weeks of age. Inspectors should not use this age as an absolute “cutoff date,” but rather should use it as a guideline when evaluating exhibits that allow public contact with big cats that are at or older than 12 weeks of age. At approximately 12 weeks of age **dangerous animals**, such as tigers, lions, bears, and wolves, become too big, too fast and too strong to be used for public contact.
- Review the Attending Veterinarian approved plans such as the Exercise Plan for dogs [3.8], and the environmental enhancement plan for NHPs [3.81] (See Appendix A for the EEP Checklist)

#### 3.2.4.2. Inspector Behavior Guidelines around Animals

Inspectors may be asked to do on-site inspections of circuses, zoos, animal sanctuaries, or other facilities that may house a variety of nondomestic animals. Inspectors should understand and follow appropriate behavior guidelines when evaluating nondomestic animals such as primates, nondomestic cats, elephants, marine mammals, or other exotic or wild animals. This section discusses appropriate inspector behavior when inspecting nondomestic animals.

An inspector should **never** enter the enclosures of dangerous or potentially dangerous animals unless the inspector personally verifies the animals are securely locked out of the enclosure.

Rules of behavior when inspecting nondomestic animals are:

- **INTERACTION:** Do **not** reach out to, or try to pet or feed the animals, no matter how friendly they may seem
- **PROXIMITY:** Do **not** stand within reach of them
  - Big cats and non-human primates may reach out over 3 feet through narrow spaces
- **AGITATED BEHAVIOR:** If the animal appears agitated because of your presence, make your observations quickly or from a greater distance
- **LIMITING STRESS:** Some animals become stressed or agitated around strangers. Standing in front of an enclosure and looking, staring, or pointing at an animal while discussing issues with the licensee may cause stress or agitation. It is best to discuss any issues that may pertain to that animal or its enclosure at a reasonable distance from the enclosure
- **YOUR REACTIONS:** Try not to react if some animals vocalize or hit the fence or enclosure where you are standing. Many animals are looking for a reaction. Make your observations and quickly move on

#### 3.2.4.2.1 Nonhuman Primates

Primates are social animals and have complex social behaviors. Staring directly at primates is considered a threat to them, and may cause them to be agitated, especially if they are in their behind-the-scenes night quarters. While most zoo primates are accustomed to people staring at them, the public is not allowed behind the scenes and staring may be more threatening to them in their off-exhibit areas. Smiling at many species of primates may also be considered a threat, and while a primate may “smile” back, realize he is not smiling, but showing you his teeth, which may indicate a sign of aggression. Try not to point at the animals with your finger, and do not stand close enough to any enclosure that the primate may be able to touch or grab you. If a chimpanzee, gorilla, or orangutan were to grab any part of you with just one finger, it could cause significant injury or damage.

Great apes (chimpanzees, gorillas, or orangutans) may also spit water or throw fecal material or other items at strangers or at people they know but do not like, e.g., the veterinary staff. They may be obvious in picking up fecal material or items in their enclosure and throwing it in your direction; however, many wait until you turn your back, and can hit their targets with amazing accuracy.

Orangutans have a longer reach than the other great apes. Maintain an extra distance of greater than 4 feet from them as a margin of safety.

**BEWARE:** Macaques are unapparent carriers of Herpes B virus, which is deadly to humans without appropriate and immediate treatment. One drop of saliva or urine from a macaque shedding the virus splattered into a human eye or mouth, or transmitted through a bite or scratch injury has been known to cause the fatal disease. If you are inspecting a facility with macaques, be sure to protect yourself from the possibility of a bite, scratch or spray of urine or feces from these

animals. Some facilities require personal protective equipment such as a clear face guard or safety goggles, a surgical mask, gloves, and protective clothing when entering rooms housing macaques. When there are no protective equipment requirements, you **must** stay a minimum of 5 feet away from any macaque enclosure. Any inspection of macaque species within 5 feet or less of the animals or enclosures requires the use of a full-face shield, respirator, disposable gloves, foot wear, and coveralls.

Inspectors must not enter rooms when facility employees are spraying or cleaning enclosures or room surfaces, or performing functions that could result in splash hazards or aerosol production.

#### 3.2.4.2.2 Big and Small Nondomestic Cats

Cats are sensitive animals and may become agitated in the presence of strangers. Cats of all species will flatten their ears when angry or agitated. Recognize this behavior and step away from the enclosure before the cat becomes more agitated and either vocalizes or hits the enclosure fence. Talking to the animals when they are agitated rarely soothes them, as you are a stranger in their environment.

Many cats will spray-mark their environment. Often big cats, especially tigers and lions, will exhibit this behavior towards people. The cat may be standing near the front of the enclosure or will calmly walk to the enclosure fence, often near the area where people are standing. They will then turn, lift their tail, and spray urine up to 10 feet away. If you notice this behavior, you will have only a moment to step out of range.

**BEWARE:** Many enclosures, especially night quarters or gates to enclosures, have a small space between the bottom of the enclosure, fence and the ground, or around gates or feeding chutes. Livestock wire fencing has ample spaces in the fencing itself. Big cats (and small nondomestic species) are able to reach through these spaces and have been known to attack unsuspecting persons who are standing too close. Stay a minimum of 3 feet away from all big cat enclosures. Many licensees will have a protocol and an obvious painted “safety line” on the floor or a barrier running adjacent to the big cat enclosures. If entering a narrow hallway between two cages, ensure you know the whereabouts of the cats, and be careful not to back up against one enclosure with a cat present if you are startled by another cat across the hallway. Try to maintain your distance from all enclosures when in tight quarters, and if the situation seems dangerous, ask the keepers to shift the cats to enclosures away from the hallway while you conduct your inspection.

#### 3.2.4.2.3 Elephants

All elephants have the potential to be dangerous. Elephants can reach up to 8 feet with their trunks. Staying back a minimum of 8 feet, even if the elephant is chained or behind a barrier, will help to ensure your safety. Keep the handler between you and the elephant(s) at all times. Work with the handler to determine the best (safest) place to make your observations, while maintaining

an 8 foot distance from the elephant's trunk. When inspecting elephants, always have an escape route planned. When inspecting other areas of the elephant barn and the yard(s), ensure a handler or facility representative always accompanies you. Always ensure that you know the location of the elephant(s) during the entirety of your inspection.

Elephants are usually handled in two basic ways: protected contact or free contact. Protected contact involves managing an elephant with a barrier between the handler and the elephant. In protected contact, handlers do not share the same space as the elephant. Free contact involves managing the elephants without a barrier between the handler and the elephant. In free contact, the handlers share the same space as the elephant. In this management system, handlers commonly use an ankus when working with the elephant. An ankus is a device that resembles a short boat hook and has a spike and a hook.

In a protected contact system, ask the handler(s) to position the elephant(s) behind a barrier so that an inspection of the animal's feet, skin, teeth, and other parts can be conducted as needed. Although the elephant is behind a barrier, be cognizant of the elephant's trunk and maintain an 8-foot distance from the head of the elephant to ensure your safety. If needed, use your camera to get a closer view. In a protected contact management style, handlers will not enter the enclosure with the elephant(s) and you must not either.

In a free contact system, the handler will often invite the inspector to get up close to the elephant(s). Remember to keep the handler between you and the elephant, have an escape route planned and maintain your 8-foot distance (using your camera for a closer view, if needed). Do not go into an enclosure with an animal handled in free contact. Ask the handler to position the elephant in a manner that will allow you to conduct an inspection from a safe location and in a safe manner.

Regardless of the contact system, if the elephant shows signs of agitation (vocalizing, flapping ears, pulling itself to its full height, jerking its head up and down) or is not responding appropriately to the handler's commands, immediately leave the area and let the handler manage the problem. If necessary, find a location to continue observing the animal that will maintain your safety. Remember, elephants have the potential to be dangerous. Being cognizant of their location, behavior, and management style is essential to conducting a safe and thorough inspection. Working with the handlers to conduct the inspection is essential, keeping in mind that you are putting yourself at risk when you go near an elephant, even if the handler appears to be exceptionally competent.

#### 3.2.4.2.4 Hoofstock

Nondomestic hoofstock (eland, oryx, nilgai, kudu, bison, deer, etc.) may be dangerous. Bison and other bovid-type nondomestic hoofstock, as well as cervids (generally bucks), have been known to charge or butt people without warning. When inspecting nondomestic hoofstock, ensure a sturdy fence is between yourself and the animals, and do not stand within reach of these



animals. It is rarely necessary to enter a hoofstock enclosure, but if absolutely necessary, ensure the handler/keeper is always between you and the animals, and consider an escape route before entering the enclosure. Whenever possible, enter veldt-type enclosures (large pens housing multiple species of hoof stock) in a vehicle.

Camels and llamas may spit when upset, and llamas have been known to push upon, and knock over people. Note that llamas will flatten their ears when getting ready to spit. Camels may be dangerous, especially intact males. Male camels have reached over enclosures and bitten or lifted people off the ground.

Nondomestic hoofstock, have varying flight distances, which is the distance they will allow someone to approach before they flee or bolt. It is undesirable to upset the hoofstock in an exhibit, and inspectors must maintain a reasonable distance between themselves and the hoofstock living in that enclosure. Allow the keepers to suggest a distance for you to observe that is appropriate and non-threatening to the animals.

**BEWARE:** Some facilities may house ostriches with their hoofstock. Ostriches, especially males, may be deadly, and have been known to attack and seriously injure or even kill people, often unprovoked and without warning.

Their kick is powerful and they kick high and forward, aiming directly in front of them. Never enter a mixed exhibit on foot where male ostriches are housed. Cassowaries are also very dangerous birds. Never enter an enclosure housing a cassowary.

#### 3.2.4.2.5 Potential Rabies Exposure

If you are inspecting facilities where you will be entering exhibits or enclosures which contain free-roaming (or free-flying) mammals, such as raccoons, skunks, or bats, and you feel there is a potential for being bitten or scratched, or you feel there is potential for rabies exposure via the aerosol route (no matter how remote), you should wear personal protective gear, such as a mask or respirator and goggles, and have pre-exposure rabies prophylaxis.

#### 3.2.4.3. Stopping the Inspection for Veterinary Care

If during an inspection, you notice an animal that needs immediate veterinary care, instruct the licensee to seek veterinary care for the animal and stop the inspection if necessary.

Examples of when an animal may need immediate veterinary care include, but are not limited to:

- Unresponsive animal
- Pale pink or white gums
- Labored breathing/open-mouthed breathing
- Fractured or dislocated limb
- Severe bleeding or injury

- Severe, watery or bloody diarrhea

#### 3.2.4.4. Pet Dogs

Because personal pet dogs of the licensee often end up being bred and moved to the kennel, the following guidance should be followed if the personal pet dogs are housed on the same premises as the kennel or in the kennel itself:

- All intact females, capable of breeding, should be listed on APHIS Form 7005
- Pet dogs do **not** need to be tagged; although they should be assigned a tag number on APHIS Form 7005
- The only time there would be a concern about disease transmission would be if the pet dog was sick and was in need of veterinary attention
- The only time there would be a concern about containment is if there was a history of dogs getting hit by cars or injuries related to non-confinement
- Inspectors should discuss with licensees the issues of non-containment and disease transmission, e.g. *Brucella canis*, Parvovirus, etc.

#### 3.2.4.5. Barn Cats

If a licensee has barn cats, i.e., loose cats used as pets and/or for pest control, not for regulated breeding purposes, the barn cats are not covered because barn cats rarely end up being used for regulated purposes. Therefore, they do not need to be inspected or follow any of the Regulations or Standards. However, if the barn cats have a negative effect on the regulated animals, this should be cited under the applicable Standard for the species impacted, **not** the Standards for cats.

Examples of negative effects include, but are not limited to:

- Cats getting into the food supply
- Cats contaminating the animals' food and/or water
- Cats harassing or causing stress to a regulated animal such as in a prey/predator situation
- Sick cats possibly transmitting disease

If the licensee allows the barn cats to have kittens, you should **determine if the disposition of the kittens will be a regulated activity.**

#### 3.2.5. Facility Inspection — Specific Guidance

The inspector must develop a consistent method for inspecting facilities that ensures inspections are thorough, accurate, **and** all citations are based on the Regulations and Standards.

Guidance on specific issues related to facility inspection include:

### 3.2.5.1. Housing Facilities – Indoor, Sheltered or Outdoor

When determining if a facility is indoor, sheltered, or outdoor, the inspector must assess the facility in a stepwise fashion beginning with the indoor housing definition. If a facility does not meet this definition, then the inspector should next consider the sheltered housing definition if the animals housed therein are dogs, cats, or nonhuman primates. A facility is only to be considered an outdoor housing facility if it “does not meet the definition of any other type of housing...”

#### 3.2.5.1.1 Indoor Housing

The AWA Regulations define Indoor Housing as: any structure or building with environmental controls housing or intended to house animals that:

1. Is capable of temperature control within the limits for species of animal therein, maintaining humidity levels of 30 to 70 percent, and rapidly eliminating odors from within the building; **and**
2. Has a continuous connection of a roof, floor, and walls (a shed or barn set on top of the ground does not have a continuous connection between the walls and the ground unless a foundation and floor are provided); **and**
3. Has at least one door for entry and exit that can be opened and closed (any windows or openings which provide natural light must be covered with a transparent material such as glass or hard plastic)

A housing facility must meet the conditions for all aspects of the definition of “indoor housing facility” to be considered an indoor housing facility under AWA regulations. If the temperature, ventilation, and humidity are not controlled in an indoor housing facility as required by the applicable section of the Standards, the building should be cited as noncompliant.

An example of an Indoor Housing Facility includes, but is not limited to:

- A climate-controlled shed or barn that has a floor with a continuous connection with the walls and a roof and at least one door for entry and exit

#### 3.2.5.1.2 Sheltered Housing

The AWA Regulations define Sheltered Housing as: a housing facility which provides the animals at all times with:

1. Shelter, **and**
2. Protection from the elements, **and**
3. Protection from temperature extremes

A sheltered housing facility may consist of runs or pens totally enclosed in a barn or building, or of connecting inside/outside runs or pens with the inside pens in a totally enclosed building.

If a housing facility is capable of meeting all aspects of the definition of a “sheltered housing facility,” it is considered a sheltered housing facility. Even if walls, large doors, or panels are removed for part of the year, it is still considered

a sheltered housing facility if it provides the animals at all times with shelter and protection from the elements and temperature extremes.

Examples of Sheltered Housing include, but are not limited to:

- A facility consisting of connecting inside/outside pens with the inside pens contained in a building
- A facility with primary enclosures entirely enclosed within a building which is set on top of the ground and does not have a floor which is continuously connected to the walls
- A facility consisting of some enclosures that are fully enclosed within the building AND some enclosures that are connecting inside/outside pens

#### 3.2.5.1.3 Outdoor Housing

The AWA Regulations define Outdoor Housing as: any structure, building, land, or premise, housing or intended to house animals, which does not meet the definition of any other type of housing facility provided in the Regulations, and in which temperatures cannot be controlled within set limits.

Examples of Outdoor Housing Facilities include, but are not limited to:

- A facility with outdoor pens that has an open building-like structure with a roof and partial walls over the pens that do not provide protection from temperature extremes
- Hutch-like enclosures in a yard with no protective covering
- A chain link enclosure with a dirt floor and one or more dog-house type structures for shelter for the animals
- A facility with primary enclosures enclosed within a building **without** a climate-control system or protection from temperature extremes at all times

#### 3.2.5.2. Lids on Self-Feeders

Self-feeders may be used for feeding dry food to dogs and cats. The AWA Regulations do not require lids for self-feeders. Rather, food for dogs and cats must be uncontaminated, wholesome, palatable, and sufficient in quality and quantity to maintain good health. Food receptacles must also protect food from rain and snow. If the lack of a lid contributed to poor food quality, the lack of a lid may be noted in the citation describing the noncompliance.

#### 3.2.5.3. Perimeter Fence

##### 3.2.5.3.1 Determine if the licensed facility requires a perimeter fence

The perimeter fence requirements are divided into three categories:

1. Dangerous animals that require a perimeter fence, and
2. Non-dangerous animals that require a perimeter fence, and
3. Situations where regulated facilities are **not** required to meet the perimeter

fencing requirements

#### 4. Dangerous animals that require a perimeter fence

Dangerous animals, such as large felids (e.g., lions, tigers, leopards, cougars, ligers, jaguars), bears, wolves, rhinoceros, elephants and polar bears require a perimeter fence that is:

- Not less than 8 feet high, AND
- 3 feet or more in distance from any enclosure housing animals

**NOTE:** A facility may submit a written request to AC for approval of a perimeter fence that is less than 8 feet high and/or less than 3 feet from an animal's enclosure (variance request).

#### 5. Non-dangerous animals that require a perimeter

Non-dangerous animals (e.g., fox, kangaroo, capybara, prairie dog) and nonhuman primates and marine mammals require a perimeter fence that is:

- Not less than 6 feet high, AND
- 3 feet or more in distance from any enclosure housing animals

**NOTE:** A facility may submit a written request to AC for approval of a perimeter fence that is less than 6 feet high and/or less than 3 feet from an animal's enclosure (variance request).

#### 6. Situations where regulated facilities are NOT required to meet the perimeter fence requirements

Situations where a facility **does not require** an approved written variance to deviate from the perimeter fence requirements:

- Traveling facilities with appropriate security measures
- Outdoor housing facilities that:
  - House **only domesticated farm-type animals** (such as cows, goats, pigs, sheep, llamas, and alpacas, and any hybrid crosses thereof); **AND**
  - Have effective and customary containment and security measures (e.g., farm-type pens, barns, and fences)

**Note:** If you come across other farm animal species that are not listed above but may be eligible to deviate from the perimeter fence requirements, contact your supervisor for guidance.

- Animal Care has granted standing approval (i.e., the facility does not need to seek a written variance) where alternative security measures contain the animals:
  - **Wild/exotic hoofstock** (such as, but not limited to, Brahman/zebu, mouflons/urials, vicuñas, guanacos, zebra, camels, warthogs, any species of deer, caribou, elk, reindeer, and bison); **AND**
  - Have effective and customary containment and security measures

**NOTE:** If you come across a hoofstock species that is not listed above but may be eligible to deviate from the perimeter fence requirements, contact your supervisor for guidance.

A perimeter fence is not required if the following conditions apply and the facility has obtained written approval (variance request) from the AWO Director:

- A primary enclosure made of sturdy, durable materials (concrete, wood, glass) that is high enough to restrict entry by animals and people
- A protective natural barrier at an outdoor facility that is high enough to restrict entry by animals and people
- Alternative security measures that contain the animals

#### 3.2.5.3.2 Perimeter Fence — Open Gate

During times when a zoo is open to the public, there will usually be an opening in the perimeter fence allowing public entry. Most zoos have a ticket booth or attendant between that open portion of the perimeter fence and the animal enclosures or some other method to assure that the animals are safely contained when the zoo is open to the public.

The mere presence of an open entry gate at a zoo is not a stand-alone noncompliance. If after review of the entryway, perimeter fence, and the animal enclosures, you have concerns about the containment, especially of dangerous animals, you should cite the perimeter fence or contact your supervisor.

As a performance-based Standard, if an incident occurs that involves an opened, unstaffed perimeter fence gate (escape, injury, death, etc.), the fact that an open, unstaffed gate contributed to the incident can be included in the language of the citation, which should be cited under the section that caused the incident.

#### 3.2.5.4. Unsafe Facility Conditions

Be alert for unsafe facility conditions:

- If the condition(s) adversely affects the inspector, he/she **must** leave the facility
- If not all the animals are safely contained, the inspector **must** leave the area or facility until it is safe to conduct an inspection
- If the condition(s) is noncompliant with the AWA, cite the noncompliance on the Inspection Report. Examples include, but are not limited to:
  - Bare wiring
  - Electrical wires near water
  - Electrical wires within reach of animals
  - Unprotected heat lamps
- If the condition(s) is **not** something within the AWA regulatory requirements,

report the item to the licensee, research facility representative, or an authorized representative at the facility. Examples include, but are not limited to:

- Locked emergency exits
- Unlocked or unsecured controlled substances
- If you feel that you are being threatened, abused, or harassed:
  - Leave the facility (see Workplace Violence in the AC Safety and Health Manual), **and**
  - Document what occurred in a memo to your SACS, including who said what to whom, when, where, and how, using specific language

If you have additional concerns, contact your SACS and the AC Safety and Health Officer.

### 3.2.6. Miscellaneous Inspection Guidance

#### 3.2.6.1. Authorized Person Conducting Regulated Activity

An authorized person (generally listed in Block 9 of the APHIS Form 7003) can represent the licensee during a USDA inspection. Generally, any employee of a licensee (dealer or exhibitor), whether so listed or not, may conduct sales of or exhibit animals owned by that dealer/exhibitor and also may accompany the inspector.

An authorized person may not sell or exhibit animals he or she owns unless said person has his/her own license. In summary, a licensee (Person A) is not able to legally empower someone else (Person B) to conduct regulated activity without a license. Hence, Person B may not sell or exhibit his/her own animals under Person A's license at any time.

#### 3.2.6.2. Team Inspections

Under certain circumstances, an inspector, SACS, or Animal Welfare Operations leader may request or require a team inspection. A team inspection may include an ACI, VMO, and/or a Specialist.

A team inspection is **required** for:

- Next full inspection of a facility with a Direct veterinary care NCI cited by an ACI. The second inspector must be a VMO.
- Possible confiscation
- Facilities where the licensee/registrant has threatened, abused or harassed the inspector

Other possible reasons for conducting a team inspection include, but are not limited to:

- Focused inspection follow up of a Direct veterinary care NCI cited by an ACI

- Multiple indirect veterinary care issues
- ACI has concerns about the program of veterinary care
- Multiple noncompliances
- Repeat noncompliances
- Large facilities or complex inspections
- Facilities with current IES investigations
- Expertise in a particular species needed
- Training
- Complaints, such as multiple complaints against the same facility or the same issue at the facility
- Licensee/registrant has a history of appealing NCIs

Be sure all inspectors and Specialists involved are listed in ACIS.

### 3.2.6.3. Field Specialist Consultations

If an inspector has an issue or situation that would benefit from a consult with a Field Specialist, the inspector may contact the Field Specialist. The inspector must inform his/her SACS (by email cc or phone) about consulting with the Field Specialist.

After the initial consultation with the Field Specialist, the inspector and the SACS will determine how further consultation with the Field Specialist should occur, i.e., going through the SACS or the inspector contacting the Field Specialist directly and copying the SACS on any correspondence.

### 3.2.6.4. Action to Take on Noncompliant Item Noted While Off Duty

If you are off duty and notice a noncompliance at a licensed facility or find an unlicensed exhibitor, you are **not** required to take any action. However, if you choose to take action, suggested actions include:

- Assess the severity of the noncompliance
- If in your territory, return to the facility when on duty and conduct an inspection or evaluation of the situation
- If **not** in your territory, contact your SACS when on duty to determine a course of action
- Take appropriate immediate action, if required

#### NOTICE

Remember that you **cannot** work overtime **without** your SACS approval.

If you elect to conduct an inspection or evaluation of the situation:



- Contact your SACS or SOTW for approval prior to initiating an inspection or evaluation
- If action was taken, send your SACS:
  - A memo documenting the situation and the action taken
  - The Inspection Report, if appropriate

#### 3.2.6.4.1 Life Threatening Situation

If there is a life-threatening situation, such as a dangerous animal escape, then:

1. Leave the area immediately
2. Contact facility personnel/management
3. Call 911, if appropriate

#### 3.2.6.4.2 Non-Life Threatening Dangerous Situation

If you believe that the noncompliance results in a non-life threatening but dangerous situation to the animal or the public, speak to the licensee or an authorized representative. If the licensee does **not** correct the NCI at that time, then:

1. Speak to the management of the venue
2. Call your SACS, the SOTW, or the Animal Care Office's emergency contact number and discuss a course of action

Contact local authorities, such as the local police or animal control officer, if appropriate, e.g., a non-regulated species is involved.

#### 3.2.6.4.3 No Immediate Danger

If you believe that the noncompliance results in **no** immediate danger to the animal or the public, you may choose to:

- Speak to the licensee or authorized representative, or
- Take **no** action at that time

### 3.3. Completing the Inspection Report

#### 3.3.1. General Information

The inspector **must** complete an official Inspection Report as soon as possible at the end of the inspection. (See Notice Box below). **Remember** that Inspection Reports with a Direct NCI must be completed and delivered to the licensee/registrant immediately after the inspection. The Inspection Report should follow the format of the Inspection Report template in the Animal Care Information System (ACIS).

For information and instruction on how to plan an inspection, enter data, and finalize an Inspection Report in ACIS, refer to the training material provided to you and contact your SACS if you need assistance.

**NOTICE**

Inspection Reports are to be finalized in ACIS, delivered in person, or sent to the licensee or registrant, and scanned into ACIS **within 5 business days of the date of the inspection.**

If an Inspection Report has a correction deadline that is less than 5 business days, the licensee or registrant must receive the Inspection Report prior to the earliest deadline. Exceptions to the 5 day or earliest deadline delivery must be pre-approved by a SACS.

The Inspection Report **must** contain the following general information entered automatically by ACIS:

- Business name
- Customer ID
- Date of inspection
- Licensee, registrant, or applicant's name as listed on Application for License or Registration
- Mailing address as listed on Application for License or Registration
- Site name, if applicable
- Site number or TRA (Traveling on the Road) (see Traveling (TRA) Site) as assigned by ACIS. Make sure that you are in the correct site, and ensure you do **not** enter an inspection into an inactivated site
- USDA license or registration number (except for prelicense inspections)

If any of the above information is incorrect in ACIS due to a **data entry error**, such as a misspelled name or transposed address numbers, contact Program Support in the appropriate Animal Care office to have the information corrected before you complete the Inspection Report.

### 3.3.2. Changes in Business Information

If you arrive at a facility and find that the location is no longer owned, managed, or substantially controlled by the licensee/registrant **and** the licensee/registrant did not notify AC within 10 days of the change, you should:

- Not conduct an inspection because a new license/registration is required to conduct regulated activity at that location
- Cite the licensee/registrant for failure to notify AC of the change in business status [2.8, 2.27, 2.30]
- Contact your SACS to discuss any further citations, such as, conducting regulated business without a license

For other changes that do not require a new license/registration, such as a change of mailing address, inform the licensee/registrant that he/she should

contact the appropriate Animal Care office to make the changes.

If you are unsure how to proceed, contact your SACS.

### 3.3.3. Action to Take When a Person, Facility, or Site is NOT in the ACIS Database

If the person, facility, or site is **not** in the ACIS database:

- Complete the Inspection Report using the Microsoft Word Inspection Report Template, have an authorized person sign the report, and follow the procedures for [Handwritten Inspection Reports](#) in Chapter 2, **OR**
- If you have Internet access:
  - After the inspection, contact an Inspection and Licensing Assistant (ILA) or the Program Specialist at the appropriate Animal Care office
  - Provide the ILA/Program Specialist the following information:
    - Licensee/registrant/applicant/owner's full name, if applicable
    - CID Number, if applicable
    - Complete mailing or business address, if needed
    - Complete site address, if adding a new site
    - County, if known
    - Business telephone number, including area code
  - Obtain the customer number, if available
  - After the ILA/Program Specialist has updated ACIS, enter the Inspection Report into ACIS
  - After you have reviewed the inspection findings with the licensee/registrant/applicant/owner, and checked the Inspection Report for accuracy, finalize the report in ACIS before delivering a copy to the licensee/registrant/applicant/owner

### 3.3.4. Traveling (TRA) Site

A traveling site is a temporary animal location, housing, or exhibit area, such as:

- A city where the licensee is performing
- An airport
- An auction market

On the Inspection Report:

1. Make sure that you use the "traveling-on-the-road" (TRA) site designation in ACIS
  - If the licensee does **not** have a TRA site already in ACIS, follow the

- procedures for Action to Take When a Person, Facility, or Site is **not** in the ACIS Database
- If the licensee has more than one TRA site, use the correct TRA site if it is in ACIS
- 2. Add the exact location of the inspection, such as address, name of the mall, building, or fairground, **and always** include the city and State, in the narrative section of the Inspection Report
- 3. Add the name of the Unit (e.g., Red Unit, Green Unit), if applicable, in the narrative section of the Inspection Report

### 3.3.5. Type of Inspection

The Inspection Report **must** specify the type of inspection conducted. Enter the type of inspection into the ACIS Inspection Report template.

The types of inspections are:

- Attempted – situation where an authorized person was **not** available to accompany the inspector. **No** inspection was conducted
- Prelicense – inspection to determine compliances with the AWA Regulations and Standards prior to issuance of a USDA license. Indicate whether 1st, 2nd, or 3rd Prelicense Inspection.
- Routine – normal periodic, unannounced inspection including:
  - Complete inspection of the facility
  - New site or additional site inspection (announced)
  - A complete inspection to follow up on a public complaint involving animal welfare
  - An inspection to determine whether unlicensed activity may be ongoing
  - Inspection to lift a suspension **if** required pursuant to a Consent Decision or Decision and Order. (Note - This may be a scheduled/announced inspection. Consult Regulatory Support Staff.)
- Focused – unannounced inspection including:
  - Reinspection for Direct NCIs
  - Reinspection for a specific NCI or NCIs cited on the previous inspection
  - Partial inspection of the facility, such as animals only or records only
  - A partial inspection to follow up on a public complaint concerning animal welfare

### 3.3.6. Inspection Report Narrative

Refer to Inspection Findings in Chapter 2 for instructions on documenting inspection findings in the narrative section of the Inspection Report.

### 3.3.7. Examples of Citations

The following pages show examples of noncompliance citations. Develop a consistent method of writing citations.

- EXAMPLE** Standard: SECTION 3.1(a) HOUSING FACILITIES, GENERAL
- Noncompliance: The roof in the southeast corner of the kennel building is falling in due to rotting wood. Pieces of wood from the roof have fallen into the pen below that houses three adult dogs.
- Why a noncompliance: Housing facilities must be kept in good repair, and the kennel building is not in good repair. The falling roofing material and wood beams could injure the dogs, and result in the dogs being exposed to rain and other weather conditions.
- How to comply: The roof must be kept in good repair. Maintenance problems need to be identified and fixed in a timely matter to keep the facilities in good repair and protect the animals from injury.
- Correction date: Correct by (date).
- EXAMPLE** Standard: SECTION 3.83 WATERING
- Noncompliance: The water receptacle in the enclosure housing ten adult macaques has a layer of debris and scum floating on the top of the water and a thick layer of algae along the sides.
- Why a noncompliance: Nonhuman primates must be provided with potable water and water receptacles must be kept clean and free of contamination. The presence of debris, scum, and algae is an indicator of contamination of the water which can cause illness in the animals.
- How to comply: All water receptacles should be cleaned and sanitized at least once every two weeks, or more often if necessary, to keep them clean and free from contamination such as dirt, debris, scum, or algae.
- Correction date: Correct by (date).
- EXAMPLE** Standard: SECTION 3.104(b)(1)(i) SPACE REQUIREMENTS
- Noncompliance: Two beluga whales are housed in a pool that only provides a Minimum horizontal Distance (MHD) of 25 feet.
- Why a noncompliance: Two beluga whales must be housed in a pool to have a MHD of 28 feet and the pool the whales are housed in only provides an MHD of 25 feet.
- How to comply: Measures must be taken to provide the required MHD for the whales.
- Correction date: Correct by (date).

**EXAMPLE** Standard: Section 3.125(a) FACILITIES, GENERAL

Noncompliance: The enclosure housing three adult tigers has a wire panel next to the den which has a broken wire. The ends of the broken wire have sharp edges and are protruding into the enclosure.

Why a noncompliance: Housing facilities must be maintained in good repair to protect the animals from injury and contain the animals. The tiger enclosure is not being kept in good repair which could result in the tigers being injured by the sharp points on the wire.

How to comply: The wire should be repaired or replaced. Maintenance problems must be identified and fixed in a timely manner to keep the facilities in good repair and protect the animals from injury.

Correction date: Correct by (date).

**EXAMPLE** Multiple Sections and Multiple Species: If an NCI involves multiple sections of Regulations/Standards and multiple species, each section of the Regulation/Standard must be cited separately.

For example: A food storage room used to store food for guinea pigs, rabbits, nonhuman primates, and wild/exotic animals is cluttered, dirty, and has broken bags with food spilling on the floor, and the unopened bags of nonhuman primate food are stored directly on the floor and up against the walls.

Sections 3.25(c), 3.50(c), 3.75(e), and 3.125(c) –STORAGE OF FOOD would be in noncompliance. Each of these sections should be cited for the species affected.

**EXAMPLE** Multiple Noncompliances under one Section and Subsection: If multiple noncompliances involve one section and subsection of the Regulations/Standards, these NCIs may be grouped together.

For example, for camels in a petting zoo:

The roof of the barn is in disrepair and has an opening/hole which allows rain and snow to fall into the pens.

The partition between the camel pen and the food storage area has numerous holes allowing the camel access to the stored food.

The front gate of the outdoor pen has a broken hinge and does not close properly.

SECTION 3.125(a)–STRUCTURAL STRENGTH would be the noncompliance and all three items could be cited together.

**EXAMPLE** Multiple Noncompliances under the Same Section but Different Subsections: If multiple noncompliances involve the same section but different subsections, each NCI must be cited separately.

For example, for nonhuman primates: There are multiple NCIs of SECTION 3.80 PRIMARY ENCLOSURES—General Requirements

SECTION 3.80(a)(2)(i)—A pen housing four spider monkeys has broken wire mesh flooring in the right rear corner with sharp wire ends sticking up into the pen.

SECTION 3.80(a)(2)(vii)—There is no shade area in the outdoor nonhuman primate exhibit and it is summer with ambient temperatures over 100°F.

SECTION 3.80(a)(2)(ix)—A pen housing four baboons has wooden walls with all the paint scratched off so that the walls can no longer be properly cleaned and sanitized.

Each of these should be a separate citation.

### 3.3.8. Information Inspectors Should Not Include in the Narrative

The narrative section should **not** contain:

- Administrative messages to the Animal Care offices or staff
- Animal inventory
- Comments on public complaints
- Date of last inspection
- Personal comments about the facility
- Personal or proprietary information, such as:
  - Addresses, other than the licensee/research facility mailing and/or business address
  - Driver's license numbers
  - Names of animal handlers
  - Names of buyers of animals
  - Name(s) of person(s) accompanying you on the inspection, **except** for other AC personnel
  - Names of principle investigators or research facility personnel
  - Names of sellers of animals
  - Social security numbers
  - Sources of animals
  - Telephone numbers, other than your contact information, if applicable

- Recommended enforcement action

#### NOTICE

Remember that the Inspection Report may be used by our Office of the General Counsel (OGC) as evidence in a court proceeding. The Inspection Report is also available to the public through a Freedom of Information Act request or viewed via the Internet at the Animal Care website.

### 3.3.9. Repeat Noncompliant Item Identified

Refer to [Repeat NCI](#) in Chapter 2 for information on Repeat noncompliant items.

### 3.3.10. Direct Noncompliant Item Identified

Refer to “Direct” NCI Identified in Chapter 2 for information on Direct noncompliant items.

### 3.3.11. Critical Noncompliant Item Identified

Refer to “Critical” NCI Identified in Chapter 2 for information on Critical noncompliant items.

### 3.3.12. Noncompliant Item with Correction Time Remaining

#### 3.3.12.1. Focused Inspection

If you are conducting a “focused” inspection, such as follow up on a Direct or Repeat NCI, and there are previously identified uncorrected NCIs that still have correction time remaining, do **not** re-cite or mention these NCIs on the Inspection Report. These are **not** repeat NCIs. Be sure to specify that this was a focused inspection in the Inspection Report inspection type and narrative.

#### 3.3.12.2. Full Inspection

If you are conducting a full inspection and there are previously identified uncorrected NCIs that still have correction time remaining, do **not** re-cite these NCIs. Note on the Inspection Report that the NCIs have **not** been corrected, but that the correction date has **not** passed. These are **not** repeat NCIs.

### 3.3.13. No Regulated Animals Present

Even though there may be **no** regulated animals present at a facility, an inspection may still be conducted.

Factors to consider when deciding whether to inspect a facility include, but are **not** limited to:

- Are there areas of the facility that you have **never** inspected before, e.g., a



new building?

- Are there records to inspect?
- Are there transportation vehicles to inspect?
- Does this facility have a history of noncompliance?
- Even though there are **no** animals currently at the facility, do regulated animals go in and out of the facility, such as traveling animal acts?
- Is the facility due for an inspection?
- Is this a new facility added to your territory?
- Is this an active research registrant that has not been inspected this fiscal year?

After using your best judgment and determining that there is nothing to inspect, you may choose **not** to conduct an inspection.

If you conduct an inspection:

- Classify the inspection as “Routine”
- Only cite NCIs (or document as a teachable moment, as appropriate) found during the inspection if the area with the noncompliance:
  - is currently in use, but **no** animals are there on the day of your inspection, or
  - is ready for use
- For the correction date, use the following or a similar statement: “Correct before being used for animals regulated by the Animal Welfare Act.”
- If a partial inspection, state which areas were inspected, such as records and/or specific buildings
- State in the narrative, “**No** regulated animals present at this time.”

If you do **not** conduct an inspection:

- Do **not** complete an Inspection Report
- Send a memo to your SACS explaining why you did **not** conduct an inspection

### 3.3.14. Non-regulated Animals

Non-regulated animals should **not** be inspected or mentioned on the Inspection Report unless there is potential for a negative effect on the health or well-being of the regulated animal(s).

**EXAMPLE**

Examples of a potential negative effect are:

A horse is chasing a deer in a pasture on public display and causing the deer stress or injury

Rats of the genus *Rattus* bred for use in research with an infectious disease are housed in the same room with rabbits

The number of non-regulated animals is so large that the current staffing is inadequate to properly care for the regulated animals

### 3.3.15. Correction Date

A correction date is the time period in which a noncompliant item **must** be corrected. Include an actual date with the citation; do **not** use the term “immediately.”

A correction date should be:

- Appropriate to the severity of the NCI
- Determined with the concurrence of the licensee/registrant or authorized representative, if appropriate
- Realistic as to what the facility can accomplish

**NOTICE**

If the Inspection Report is being sent by certified mail, allow for the mailing time when setting the correction date.

A correction date is given for:

- Newly identified “Direct” NCIs. Give these NCIs a short correction period, e.g., by close of business on (date), within 72 hours, within 5 days. The correction date for direct NCIs should never exceed 14 days.
- Newly identified NCIs other than “Direct” NCIs. If reasonable with respect to the health and well-being of the animals involved, an inspector may allow up to 1 year for some corrections. Some examples of corrections that may warrant a year- long correction period are:
  - a. Perimeter fence replacement
  - b. Full replacement of animal enclosures
  - c. Instituting a new protocol form
- For NCIs with long correction dates, the inspector should periodically check on progress with the licensee/registrant, either via a telephone call or a courtesy visit

**NOTICE**

Reinspect for correction of a “Direct” noncompliant item no later than 45 days after the date of inspection.

For NCIs corrected **prior** to the inspection:

- Follow the [Incentives guidance](#) (see Chapter 2)

For NCIs corrected **during** to the inspection:

- The correction should read “Corrected during the inspection.”, and do **not** give a correction date.

A correction date is **not** given for:

- Airline transportation noncompliances
- NCIs identified on a Prelicense Inspection
- NCIs cited on a New Site approval inspection, except for a Direct NCI
- Repeat noncompliant items

**3.3.15.1. Extension of Correction Date**

An extension is an additional amount of time to correct a noncompliant item granted through Animal Welfare Operations leadership.

A licensee/registrant may request an extension if he/she will **not** be able to correct the NCI by the correction date.

At the time of the inspection, if a licensee/registrant anticipates that an extension will be needed because you cannot agree on a correction date or the licensee/registrant wants more than one year, explain to him/her how to request an extension.

**NOTICE**

Extensions are for special circumstances. Do **not** suggest an extension to the licensee for correction of routine noncompliant items.

An extension request, whether anticipated or unexpected, **must** be:

1. In writing
2. Appropriate, i.e., **only** for an NCI other than a direct NCI (e.g., one related to facility maintenance)
3. Specific as to the reason/justification for the request

**EXAMPLES**

- Unexpected delays during the correction process, such as budget or severe weather delays
- Unforeseen special circumstances that prevent completion, such as death or serious illness in the family

4. Sent to the appropriate Animal Care office (Raleigh or Fort Collins)
5. Received by the Animal Care office **prior** to the original correction date

### **3.3.15.2. Processing of the Extension of Correction Date Request**

Take the following actions to process the extension of the correction date request:

1. The Animal Care office will send the extension request to the appropriate SACS
2. SACS will review and discuss with the inspector, if necessary
3. SACS will write the letter informing the licensee/registrant whether or not the extension was granted
4. SACS will upload the letter into the licensee/registrant's file in ACIS
5. SACS will email the letter to the licensee/registrant if email is available, **OR**
6. SACS will send the letter to Program Support at the appropriate Animal Care office (Raleigh or Fort Collins) **and** Program Support will send the letter to the licensee/registrant

### **3.3.16. Prior to Printing the Final Inspection Report**

To make the Inspection Report as accurate as possible, ensure that:

- You are entering the inspection:
  - Under the correct licensee/registrant
  - Under the correct certificate number
  - In the correct site
- All information is entered into the database correctly, such as:
  - Inspection type
  - Name and title of person signing the Inspection Report
- All information in the narrative is correct, such as:
  - Citation section and subsections
  - Buildings/locations inspected, if appropriate
  - Location of inspection of a TRA site
  - Names of elephants inspected
- The narrative section uses the appropriate wording to describe the problem
- Repeat NCIs are the same section/subsection cited on the previous inspection(s)

**NOTICE**

If the incorrect section or subsection was cited on the previous inspection, cite the correct section and subsection and add: "Cited incorrectly under (section/subsection #) on (date) inspection."

- Check spelling and grammar and review a draft copy of the Inspection Report with the licensee/registrant/facility representative
- Make the appropriate changes, if necessary, and print the Inspection Report for a signature

**BE SURE TO FINALIZE THE INSPECTION REPORT.**

### 3.3.17. Finalizing the Inspection Report

After you have (1) reviewed the inspection findings with the licensee/registrant/applicant, (2) given the facility representative the opportunity to provide additional information pertinent to the findings, and (3) checked the Inspection Report for accuracy, finalize the report in ACIS before delivering a copy to the licensee/registrant/applicant. (For additional information and instruction, refer to the ACIS Guidance.)

**NOTICE**

You do **not** have to completely finalize an Inspection Report for a specific site to do an Inspection Report for another site of the same licensee or registrant.

### 3.3.18. Scanning the Inspection Report into ACIS

Inspectors **are required** to upload their signed and completed Inspection Reports into ACIS within 5 days of the completion of the Inspection Report.

Inspection Reports should **not** be sent by mail or emailed to Program Support. **Do not keep the hard copy of the Inspection Report.** It should be destroyed.

Inspection Reports should be uploaded into the Customer file in ACIS using the following procedure:

- Scan the signed Inspection Report and Inventory as a PDF document
  - For reports that were **emailed** to a licensee or registrant, scan the return acknowledgment email sent by the facility along with the Inspection Report as one document
  - For reports that were sent by **certified mail**, scan a copy of the certified mail certificate along with the Inspection Report as one document
  - For reports that have been **rescinded and amended**, scan the Amended Report letter sent to the licensee/registrant/applicant along with the amended Inspection Report as one document

- Name the Inspection Report as the customer number, licensee/registrant name, and date of inspection (day, month, year with no spaces). Example: 223344 John Smith 15SEP2018.
- In ACIS, select the appropriate Customer in the Customer tab
- Upload the Inspection Report into the Files tab
- The newly uploaded signed Inspection Report can be found by returning to the Files tab (Note - there may be a delay of up to 30 minutes before the Inspection Report appears in the Files tab.)
- If there is a problem during the uploading process, the inspector should contact his/her SACS and/or the respective Assistant Director

### 3.3.19. Handwritten Inspection Reports

There are certain situations where the inspector may choose to, or **must**, hand write the Inspection Report, including but not limited to:

- Computer failure
- Printer failure
- Unique situations which may arise where the use of the computer is not feasible

If you hand write an Inspection Report, use the blank pre-printed Inspection Report form. Always have a supply of blank pre-printed Inspection Reports, either with you, or in the government vehicle.

When using the pre-printed Inspection Report:

- Hand write all information legibly and neatly
- Use black or blue ink

If you want to give the licensee/registrant/facility representative a copy of the handwritten Inspection Report at the time of the inspection, either make a photocopy, or complete two reports and sign both copies.

If you do **not** give the licensee/registrant/facility representative a copy of the handwritten Inspection Report at the time of the inspection:

- Enter the Inspection Report in ACIS as instructed
- Send a copy of the ACIS Inspection Report to him/her as instructed

#### REMEMBER:

- You **must** enter the handwritten Inspection Report into the ACIS database as soon as possible
- The narrative entered into the ACIS database **must be identical** to the handwritten Inspection Report

**NOTICE**

Dates of the actual inspection, Prepared By, and Received By may be different due to the automatically generated prepared date in ACIS. You must correct the date of the actual inspection. You do not need to correct the Prepared and Received By dates even if the licensee/registrant has a copy of the handwritten Inspection Report.

- Do **not** put a statement that this is electronic or transcribed version of the original Inspection Report

If the licensee/registrant does **not** have a copy of the handwritten Inspection Report:

- Send a copy of the ACIS Inspection Report and Animal Inventory to the licensee/registrant by email or certified, return receipt mail
- Scan a copy of the ACIS Inspection Report, Animal Inventory and email receipt acknowledgement or certified mail receipt into ACIS
- Scan the handwritten Inspection Report into ACIS and then destroy the original copy

If the licensee/registrant does have a copy of the handwritten Inspection Report:

- Scan the handwritten Inspection Report into ACIS
- Do **not** send a copy of the ACIS Inspection Report to the licensee/registrant

In the case of a printer failure, send a copy of the report to the licensee/registrant/applicant by email or certified, return receipt mail when the printer is repaired.

### 3.3.20. Mistakes on the Inspection Report

Read the Inspection Report carefully before printing and finalizing to ensure that all information and spelling are correct.

Incorrect customer ID, date of inspection, site name (001, TRA), USDA license or registration number, requires rescinding the Inspection Report, correcting the error, and sending the licensee/registrant an amended report with an Amended Report Letter.

#### 3.3.20.1. Major Errors

If a major error is noted on the Inspection Report after the final copy has been printed or the Inspection Report has been finalized, it **must** be corrected.

Major errors include, but are **not** limited to:

- Correction date given for a repeat noncompliance
- Correction date(s) omitted

- Exit interview statement not included
- Incorrect citation
- Incorrect inspection type
- Factual errors
- Wrong site

#### NOTICE

Spelling or grammatical errors are **not** considered major errors

### 3.3.20.2. Mistakes Noted by the Animal Care Office

If Program Support or Animal Welfare Operations leadership discovers a mistake on an Inspection Report:

1. The inspector and the SACS will be notified
2. The inspector **must** correct the Inspection Report following the procedure outlined in Correcting or Amending the Inspection Report
3. The inspector **must** deliver the amended Inspection Report to the licensee in person or send by email or certified, return receipt mail **within 2 weeks**

### 3.3.21. Correcting or Amending the Inspection Report

**No pen and ink changes may be made to the Inspection Report.**

If a major error(s) is noted after the Inspection Report has been finalized, and a copy of the Inspection Report has **not** been given to the licensee/registrant/facility representative:

1. Contact your SACS or SOTW if your SACS is not available to have the Inspection Report reset to draft

#### NOTICE

You **must** upload the Inspection Report into ACIS before it can be reset to draft.

2. Correct the draft Inspection Report
3. Provide a copy of the corrected Inspection Report and Animal Inventory to the licensee/registrant/facility representative through the usual delivery methods

If a major error(s) is noted after the Inspection Report has been finalized and a copy of the Inspection Report has been given to the licensee/registrant/facility representative:

1. Notify your SACS to have the original Inspection Report rescinded



2. Enter a new Inspection Report into ACIS
3. Provide a copy of the corrected Inspection Report, Animal Inventory, AND the Amended Report Letter to the licensee/registrant/facility representative through the usual delivery methods

The new Inspection Report **must**:

1. Be dated the date that the actual inspection was conducted in “Inspection Date”
2. Be dated at the bottom the date that the amended Inspection Report was:
  - “Prepared” by you, and
  - Signed by or sent to the licensee/registrant

#### NOTICE

The ‘**prepared by**’ and ‘**signed by**’ dates do not have to be the same.

3. Correct the major mistake for which the amended Inspection Report is being generated
4. Cite the noncompliances that were correct on the original Inspection Report. These noncompliances must be identical to the citations that were on the original Inspection Report.

Do **not** put a statement or any reference on the Inspection Report that this was an amended Inspection Report.

### 3.3.22. Inspection Appeals Process

If the licensee/registrant has a concern about any findings on the Inspection Report, he/she may use the inspection appeals process to resolve the dispute.

#### 3.3.22.1. Prior to Finalizing the Inspection Report

If a licensee/registrant/facility representative has questions or concerns about a noncompliant item(s) cited on the Inspection Report, the inspector should explain why the noncompliance was cited and give the facility representative the opportunity to provide additional information pertinent to the findings at the exit interview (see [Exit Interview](#) in Chapter 2). If the concern is resolved, change the citation. If the concern **cannot** be resolved:

- Inform the licensee/registrant/facility representative of the next step in the appeals process
- Give the licensee/registrant/facility representative a copy of the [Appeals Process Factsheet](#)

If there was an unresolved disputed noncompliance:

- Photograph any NCI that the licensee/registrant is going to appeal or likely to

appeal (see [Inspection Photographs](#) in Chapter 2)

- Finalize the Inspection Report
- Inform your SACS that there may be an appeal of a noncompliance item(s) cited on the Inspection Report

### 3.3.22.2. After Finalizing the Inspection Report

If a licensee/registrant/facility representative has questions or concerns about a noncompliant item(s) cited on the Inspection Report, meet with the licensee/registrant/facility representative, if requested, to discuss the noncompliance.

If you and the licensee/registrant/facility representative resolve the disagreement on the noncompliance:

- Generate an amended Inspection Report and inform your SACS of the resolution
- Give or send (by an acceptable method) a copy of the Inspection Report, Animal Inventory **and** the Amended Report Letter to the licensee/registrant
- Scan a copy of the amended Inspection Report, Animal Inventory and Amended Report Letter into ACIS

If the dispute **cannot** be resolved:

- Inform the licensee/registrant/facility representative of the next step in the appeals process
- Give the licensee/registrant/facility representative a copy of the [Appeals Process Factsheet](#)
- Photograph any NCI that the licensee/registrant is going to appeal or likely to appeal, if possible
- Inform your SACS that there may be an appeal of a noncompliance item(s) cited on the Inspection Report

If the licensee/registrant's appeal of a noncompliance is determined to be **valid**, i.e., a citation is modified or deleted, the original Inspection Report will be rescinded in ACIS. Program Support, in the appropriate Animal Care office, will generate a new draft Inspection Report for the inspector to amend. The inspector amends the Inspection Report and delivers the Inspection Report, Animal Inventory and the Amended Inspection Letter to the licensee/registrant/facility representative by an acceptable delivery method.

If the licensee/registrant's appeal of a noncompliance is determined to be **invalid**, the appeals team assigned to the matter will write a letter to the licensee/registrant/facility representative informing him/her of the decision. The inspector and SACS will receive a copy of the letter from Program Support.

**NOTICE**

Inspection appeals should **not** delay reinspection of Direct noncompliances or interfere with efforts to ensure that the immediate welfare needs of the animals are met.

**3.4. Safety and Ethics Issues****3.4.1. Bribery Reporting Procedures—Inspector’s Responsibility**

If you are offered a bribe, or perceive that you are being offered a bribe, refuse the bribe and report it immediately to the Office of the Inspector General (OIG).

**Do not report the bribe to your supervisor.**

It is your duty to report being offered a bribe, or if you perceive that you are being offered a bribe.

Follow these steps if you are offered a bribe, or perceive that you are being offered a bribe:

1. **Do not take the bribe.** Say, “I **cannot** do that.” Do **not** discuss the bribe offer any further, and do **not** tell the person who offered it that you are going to report it to law enforcement or other authorities.

**SAFETY**

If you believe that you are in any danger at this time, leave the facility as quickly and safely as possible.

If you do **not** believe that you are in danger, then assess the situation and use your judgment as to what to do, since you do **not** want the person to think that you are going to report the incident to the authorities. Some possible courses of action include, but are **not** limited to:

1. Give the person a plausible excuse and leave the facility
2. Complete the inspection or exit interview quickly, but not suspiciously so
3. Complete the inspection, then tell the person that you are going to complete the Inspection Report off site
4. At the first practical moment after you are out of sight and earshot of the person who made the offer, and as soon as privacy permits, **telephone OIG** using one of the following phone numbers:
  - **(202) 720-7257** – 24 hour direct line to OIG, Washington, DC, for reporting threats, assaults, and bribery attempts, or
  - **(800) 424-9121** – OIG Hotline for reporting fraud, waste, and abuse, or

- **(202) 690-1622** – Commercial hotline

**Note:** Collect calls are accepted.

5. Follow the instructions given to you by the OIG Special Agent. An OIG Special Agent will respond to your telephone call. Based on information that you provide, OIG Agents will evaluate the alleged bribery attempt to determine the appropriate investigative action. OIG needs your full cooperation.
6. Do **not** report the bribery attempt to your supervisor or discuss it with anyone else unless instructed to do so by an OIG Special Agent. Any discussions could compromise the investigation. OIG will ensure that appropriate supervisory personnel are notified in a manner which will not prejudice the investigation.
7. Any subsequent contacts or communication between you and the person who offered the bribe will be controlled and monitored by the OIG
  - Do **not** be afraid to cooperate with investigators. Even though you would **not** accept a bribe, it is your duty to report such matters and to cooperate fully with investigators to prevent further bribery attempts to you or other USDA employees.

### **3.4.2. Bribery Reporting Procedures—Supervisor’s Responsibility**

If an employee reports an offer or a perceived offer of a bribe to you:

Instruct the employee to call OIG immediately, if he/she has not already done so

1. Do not discuss the bribery attempt any further with anyone, including the employee
2. Do not attempt to investigate the incident

### **3.4.3. Gifts from Licensee/Registrant**

Do **not** accept any “gifts” from licensees or registrants greater than the value of a soft drink or cup of coffee. You do **not** want any perception of impropriety.

### **3.4.4. Interference with the Inspection**

A licensee, applicant, research facility representative, or other person must not interfere with, threaten, abuse, or harass any APHIS official in the course of carrying out his/her duties.

If you believe that any person at the facility is interfering with the inspection process:

- Tell him/her to stop if it is safe to do so
- If the behavior continues or you feel unsafe, **leave the facility**
- Contact your SACS

- Document what occurred in a memo to your SACS, including who said what to whom, when, where, and how, using specific language

For more detailed information on Interference, see Chapter 2 and the *AC Field Safety and Health Manual*.



# Chapter 4. Specific Types of Inspections

**Contents**

**UNDER CONSTRUCTION**





# Chapter 5. Record-Keeping for Licensees

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### DISCLAIMER

The Animal Welfare Inspection Guide is intended to be a reference document to assist the inspector. The Inspection Guide does not supersede the Animal Welfare Act (AWA), the AWA Regulations and Standards, AC policies and other guidance, the Required Inspection Procedures, standard procedures, or the inspector's professional judgment. All inspection decisions must be justified by applicable sections of the AWA and/or the AWA Regulations and Standards.

## 5.1. Records

A dealer, exhibitor, or research facility must have all required records for regulated animals purchased or otherwise acquired, owned, held, or in his/her possession or control, transported, or disposed of.

### 5.1.1. Required Dealer and Exhibitor Records

Dealers and exhibitors **must** have the following records, when applicable, for review:

- Acquisition and disposition records [2.75(a)(1), 2.75(b)(1), 2.76(a)]
- Program of veterinary care when using a part-time attending veterinarian [2.40]

#### 5.1.1.1. For Dogs and Cats

For dogs and cats, the following information is required:

- Certification for procurement of animals [2.132(d)]
- Exercise plan for dogs [3.8]

#### 5.1.1.2. For Nonhuman Primates (NHP)

For nonhuman primates, the following information is required:

- Environmental enhancement plan for nonhuman primates [3.81]

#### 5.1.1.3. For Marine Mammals

For marine mammals, the following information is required:

- Approved water and power emergency contingency plans for marine mammals [3.101(b)]
- Documentation of training of attendants or employees working with marine mammals [3.108(b)]
- Medical records for marine mammals [3.110(d)]
- Necropsy records for marine mammals [3.110(g)(1-2)]
- Water quality records for marine mammals [3.106(b)(3)]

### 5.1.2. Computerized Records for Dogs and Cats

A licensee who uses a computerized record-keeping system must request a variance from the requirement to use [APHIS Form 7005 – Record of Acquisition of Dogs and Cats on Hand](#) and/or [APHIS Form 7006 – Record of Disposition of Dogs and Cats](#) in Appendix A. [2.75(a)(2)]

Each licensee with a computerized record-keeping system **must** request his/her

own variance.

The variance request **must** meet the following: [2.75(a)(2)(i)]

- Be in writing
- Be sent to the Fort Collins or Raleigh office as appropriate
- Contain a description of the computerized record-keeping system to be used
- Explain why the APHIS Form 7005 or 7006 is unsuitable to use

If the variance is denied, the licensee may request a hearing for the purpose of showing why the variance should **not** be denied. The denial remains in effect until a final legal decision is rendered. [2.75(a)(2)(ii)]

The inspector may do the following:

- Review records on the computer screen, or
- Review a hard copy

#### NOTICE

Unless approved by AW Operations, records must be viewable during the inspection. Providing physical media (*e.g.*, USB drive, CD) without a method to view its content is insufficient.

- If the inspector is unable to review the records for proper inspection, cite it on the Inspection Report under section 2.126(a)(2).

### 5.1.3. Health Certificates for Dogs, Cats and Nonhuman Primates

A **licensed** veterinarian must execute and issue health certificates for dogs, cats and nonhuman primates transported by an intermediate handler or carrier in commerce or delivered by [2.78]:

- A dealer, exhibitor, operator of an auction sale, broker, or
- Department, agency, or instrumentality of the United States, or
- Any state or local government

This **includes** interstate and international transportation, as well as other transportation which affects commerce.

#### NOTICE

This health certificate requirement **excludes** any person who arranges for transportation or transports animals solely for the purpose of breeding, exhibiting in purebred shows, boarding (not in association with commercial transportation), grooming, or medical treatment, and is not otherwise required to obtain a license. [2.1(a)(3)(v)]

### 5.1.3.1. Responsibility for Health Certificates

The **dealer/exhibitor/broker** must provide a valid health certificate whenever a registered carrier or intermediate handler picks up a cat, dog, or NHP for transport in commerce whether being transported within or out of state. [2.78(a)]

The **transporter** may not receive an animal for transport without a valid health certificate whether the animal is being transported within or out of state. The transporter must keep and maintain a copy of the health certificates for one year. [2.77(b), 2.80(b)]

### 5.1.4. Dealer and Exhibitor Records That Are Not Required

#### NOTICE

These records are not specifically required by the AWA Regulations and Standards, **except** where applicable for marine mammals. A lack of any of these records or inadequacy of these records may not be cited as a noncompliance, except for marine mammals.

The following non-required records may be helpful to dealers and exhibitors:

- Documentation of preventive medical treatments
- Documentation of training for all handlers of dangerous animals
- Emergency plan for dealing with animal attacks or escapes
- Noncommercial diet approval for large felids

### 5.1.5. Puppy and Kitten Records and Identification

Breeders are required to identify and maintain records on all puppies/kittens born at the facility [2.50]. They have the option to maintain these records on the APHIS 7005 form OR on cage cards. [2.75]

Breeders may choose to identify their puppies/kittens less than 16 weeks of age by any of the following methods:

- An official tag, or
- An official tattoo, or
- A plastic type collar, or
- A microchip (see below), or
- A cage card (see below)

If a **microchip** is used:

- The microchip scanner must be readily available for the inspector, **and**
- The location of the microchip must be consistent from animal to animal, **and**

- The microchip number must be listed on the animal identification records

If a **cage card** is used:

- The puppies/kittens must be maintained as distinct litters at the facility where born, **and**
- The cage card must be attached to the outside of the enclosure, **and**
- Cage cards must be completed as soon as possible, preferably one or two days after each animal's birth, **and**
- Must include an individual ID number for each puppy or kitten, **and**
- The cage card may only be used as identification until the puppies/kittens are sold or moved from the facility where they were born or reach 16 weeks of age, whichever comes first, **and**
- If the cage card is used for both ID and record keeping purposes, it must be retained for one year after use

#### NOTICE

Unweaned puppies/kittens do not require individual ID while they are maintained as a litter with their dam in the same primary enclosure, provided the dam is individually identified.

If the breeder uses the APHIS 7005 for puppy records **and** a cage card to identify puppies/kittens up to 16 weeks of age, the cage card must contain the following:

- Licensee's USDA certificate number
- The letters "USDA"
- Unique number identifying each puppy/kitten

If a facility uses a cage card to satisfy **both** the records requirement **and** the ID requirement (weaning to 16 weeks of age), the cage card must contain the following:

- Licensee's USDA certificate number
- Unique number identifying each puppy/kitten
- Date of birth of the litter
- Dam's ID information
- A description of each puppy, which includes the following.
  - Breed
  - Sex
  - Color
  - Distinctive markings
- Date of disposition, death or euthanasia



# Chapter 6. Veterinary Care Requirements for Licensees

## Contents

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This Chapter applies to licensees only. For veterinary care requirements for Research Facilities, see Chapter 7.

### DISCLAIMER

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## 6.1. Attending Veterinarian

A licensee **must** have an attending veterinarian (AV) to provide adequate veterinary care to his/her animals [2.40(a)].

An attending veterinarian is defined as a person who has:

- Graduated from an AVMA-accredited veterinary school, has a certification from the AVMA if a foreign veterinary graduate, or has equivalent formal education as determined by the Administrator
- Received training and/or experience in the care and management of the species being attended, and
- Has direct or delegated authority for activities involving animals

### 6.1.1. Criteria

A licensee must:

- Employ an attending veterinarian under formal arrangements [2.40(a)(1)]
- If the attending veterinarian is part-time or has a consultant arrangement, the formal arrangement must include [2.40(a)(1)]:
  - A written program of veterinary care (PVC) and
  - Regularly scheduled visits to the premises
- If a licensee enters into a formal arrangement with a **new** part-time attending veterinarian or consultant, the attending veterinarian or consultant must:
  - Prepare a PVC, or
  - Adopt the licensee's existing PVC
- Assure the attending veterinarian has appropriate authority [2.40(a)(2)]
- Communicate to the attending veterinarian timely and accurate information on the health, behavior and well-being of the animals [2.40(b)(3)]

### 6.1.2. Multiple Attending Veterinarians

In some circumstances a facility may use more than one veterinarian, or more than one attending veterinarian. For example, a facility may use one veterinarian with specialized knowledge and experience for all nonhuman primates and another veterinarian for all other species present at the facility.

At least one veterinarian must be employed as the attending veterinarian under formal arrangements.



### 6.1.3. Veterinary Authority

The AWA Regulations require the licensee to assure the attending veterinarian has the appropriate authority to [2.40(a)(2)]:

- Ensure adequate veterinary care
- Oversee the adequacy of other aspects of animal care and use

The duties performed by the attending veterinarian to ensure compliance with the Regulations are ultimately the responsibility of the licensee, and the licensee must provide the attending veterinarian with adequate authority to carry out his/her functions.

### 6.1.4. Responsibilities

The attending veterinarian under the authority given to him/her by the licensee must:

- **Ensure the provisions of adequate veterinary care to the licensee's animals [2.40(a)]**
- Conduct regular visits to the premises, if the attending veterinarian is part-time or a consultant who is the attending veterinarian [2.40(a)(1)]
- Approve the facility's practices as required by the Standards listed below

#### 6.1.4.1. Dogs and Cats

Approval of the attending veterinarian is required for the following:

- Housing of dogs and cats in indoor facilities or the sheltered part of sheltered facilities where the ambient temperature falls below 50 °F for those animals who are not acclimated to or cannot tolerate lower temperatures, such as [3.2(a) and 3.3(a)]:
  - Short haired
  - Sick
  - Young or aged
  - Infirm
- Outdoor housing of dogs and cats in the following categories [3.4(a)(1)]:
  - Dogs/cats not acclimated to temperatures prevalent in the area/region
  - Breeds that cannot tolerate the prevalent temperature extremes
  - Sick, infirm, aged or young dogs/cats
- Exercise plan for dogs [3.8]
- Exercise for dogs – Non-group housing of a dog(s) over 12 weeks of age if in the opinion of the attending veterinarian, group housing would adversely affect the health or well-being of the dog(s) [3.8(b)(2)]

- Exemption to the exercise requirement for a dog(s) [3.8(d)(1)]

#### **6.1.4.2. Nonhuman Primates (NHPs)**

Approval of the attending veterinarian is required for the following:

- Ambient temperature of the sheltered portion of sheltered housing facilities for NHPs [3.77(a)]
- Outdoor housing of NHPs [3.78(a)]
- Outdoor housing of NHPs with shelters that do not provide heat to prevent the ambient temperature from falling below 45°F [3.78(b)]
- Singly housed NHPs that are not able to see/hear other NHPs [3.81(a)(3)]
- Maintenance of NHPs in restraint devices for health reasons [3.81(d)]
- Statements of exemptions from participation in the environmental enhancement plan for individual NHPs [3.81(e)(1)]
- Restriction of water for NHPs [3.83]
- Approval of no food or water for NHPs during transport by a carrier or intermediate handler [3.86(c)]

In addition, facilities must follow any direction of the attending veterinarian concerning:

- Ambient temperature of indoor housing facilities for NHPs [3.76(a)]
- Relative humidity level of indoor housing and the sheltered portion of sheltered housing facilities for NHPs [3.76(b) and 3.77(b)]
- Ambient temperature in mobile or traveling housing facilities for NHP [3.79(a)].
- Environmental enhancement plan for NHPs. The plan must also be in accordance with currently accepted professional standards and address as appropriate [3.81]:
  - Social grouping [3.81(a)]
  - Isolation of NHPs that have or are suspected of having a contagious disease [3.81(a)(2)]
  - Determination of compatibility of NHPs for social housing [3.81(a)(3)]
  - Special considerations for NHPs requiring special attention, including [3.81(c)]:
    - Infants and young juveniles
    - NHPs showing signs of psychological distress
    - Individually housed NHPs that cannot see/hear their own or compatible species
    - Great apes weighing over 110 lbs.

### 6.1.4.3. Marine Mammals (MM)

Approval of the attending veterinarian is required for the following:

- Statement of exemptions to MM housing requirements, including [3.104(a)]:
  - Housing in smaller than required enclosures for nonmedical training, breeding or holding for more than 2 weeks
  - Housing in smaller than required enclosures for transfer for more than 1 week
- Feeding MM less than once per day [3.105(a)]
- Application of insecticides and other such chemical agents in primary enclosures housing MM [3.107(d)]
- Approval for the single housing of social MM [3.109]
- Approval to house newly acquired MM with resident animals [3.110(a)]
- Holding of MM in a medical treatment or medical training enclosure that does not meet the minimum space requirements for more than 2 weeks [3.110(b)]
- Procedure for cleaning and/or sanitizing an enclosure which has housed a MM with an infectious or contagious disease [3.110(c)]
- Transport plan for transport of a MM lasting more than 2 hours in duration [3.116(a)]

In addition, the frequency of feeding for a MM in transit must be as often as necessary and appropriate for the species involved or as determined by the attending veterinarian [3.115(b)].

### 6.1.4.4. Other Animals

Procedures for sanitizing pens or runs using gravel, sand or dirt which had housed a **Subpart F** animal with an infectious or transmissible disease when necessary as directed by the attending veterinarian. [3.131(b)]

#### NOTICE

If you, the inspector, have a concern with the directions, instructions, or guidance the licensee has received from the attending veterinarian, discuss your concerns with your SACS.

### 6.1.5. Health Certificates and Other Records that must be Prepared or Issued by Veterinarians

A **licensed** veterinarian must execute and issue health certificates for dogs, cats and nonhuman primates transported by an intermediate handler or carrier in commerce or delivered by [2.78]:

- A dealer, exhibitor, operator of an auction sale, broker, or
- Department, agency, or instrumentality of the United States, or
- Any state or local government

This **includes** interstate and international transportation, as well as other transportation which affects commerce.

#### NOTICE

This health certificate requirement excludes any person who arranges for transportation or transports animals solely for the purpose of breeding, exhibiting in purebred shows, boarding (not in association with commercial transportation), grooming, or medical treatment, and is not otherwise required to obtain a license. [2.1(a)(3)(v)]

- The attending veterinarian must prepare marine mammal necropsy reports [3.110(g)(1)]
- The attending veterinarian must sign health certificates for transport of marine mammals [3.112(a)]
- The attending veterinarian must execute temperature acclimation certificates for transport of marine mammals [3.112(c)]

## 6.2. Written Program of Veterinary Care

A licensee that has a part-time or consultant attending veterinarian **must** have a written program of veterinary care [2.40(a)(1)].

### 6.2.1. Requirements

The written program of veterinary care **must**: [2.40(a)(1)]

- Describe the facility's veterinary care plan

#### NOTICE

The following are **not** required by the Regulations:

- Use of the [APHIS Form 7002 – Program of Veterinary Care](#) (see Appendix A)
- The information listed in the APHIS Form 7002
- A signature of the attending veterinarian on the program of veterinary care

Topics for the **written** program of veterinary care that may be helpful in maintaining compliance (but are not regulatory requirements for a written PVC) include but are not limited to:

- Vaccinations (species, juveniles vs. adults, list of vaccines, route, schedule of when they are to be given, and whether they are to be given by the licensee)

or the attending veterinarian)

- Parasite control (ectoparasites, blood parasites, intestinal parasites – including required testing intervals, drugs to be used for prevention and treatment with ages of animals, dosages, route and frequency)
- Detailed description of emergency care availability and contact information
- Detailed description of appropriate euthanasia to be used (including any personnel authorized to perform euthanasia and the method)
- Detailed description of capture and restraint methods. If the PVC includes more than one method, it is helpful to include a detailed description of all capture and restraint methods a facility might use.
- Treatment protocols that the attending veterinarian has pre-approved for the licensee or registrant to follow for common conditions
- Other topics pertinent to each licensee

The licensee and veterinarian should consider reviewing and updating the written program of veterinary care as needed for situations such as:

- Change in the preventive medical program
- Addition of a new species of animal
- New location or site

## 6.3. Records

### 6.3.1. Required Records

A licensee **must** maintain the required records relating to the veterinary care of his/her animals and medical records for marine mammals [3.110(d)].

Required veterinary care records must be readily available to APHIS officials for review [2.126(a)(2)].

Records can be maintained at the veterinary clinic as long as they are available to the inspector on request.

#### 6.3.1.1. Dogs and Cats

The following records requiring veterinary approval are required for dogs and cats, when applicable:

- Exercise plan for dogs [3.8]
- Attending veterinarian approved exercise exemption [3.8(d)(1)]
- Health certificate for transport [2.78(a)]

#### 6.3.1.2. Nonhuman Primates

The following records requiring veterinary approval are required for nonhuman

primates, when applicable:

- Attending veterinarian approved EEP exemption [3.81(e)(1) and (3)]
- Health certificates signed by a licensed veterinarian for transport [2.78(a)]

### 6.3.1.3. Marine Mammals

The following record requiring veterinary approval is required for marine mammals, when applicable:

- Health certificates signed by the attending veterinarian for transport [3.112(a)]

Individual marine mammal medical records **must** be kept, and include the following information, at a minimum [3.110(d)]:

- Animal identification/name
- A physical description, such as:
  - Identifying markings
  - Scars
- Age
- Sex
- Physical examination information including, but not limited to [3.110(d)(2)]:
  - All diagnostic test results
  - Documentation of treatment
  - Identification of all medical and physical problems
  - Length
  - Physical examination results by body system
  - Proposed plan of action for medical/physical problems
  - Weight

Individual animal medical records **must** be kept and available for APHIS inspection [3.110(d)].

A copy of the individual marine mammal's medical/health record **must** accompany the animal if it is transferred to another facility, including contract and satellite facilities [3.110(e)].

#### 6.3.1.3.1 Marine Mammal Necropsy Reports

The preliminary necropsy report **must** [3.110(g)(1)]:

- Be prepared by the veterinarian conducting or supervising the necropsy
- List all pathological lesions observed

The final necropsy report **must** include [3.110(g)(1)]:

- All gross findings
- All histopathology findings
- A pathological diagnosis
- Results of all laboratory tests performed

Necropsy reports **must** be [3.110(g)(2)]:

- Available for APHIS inspection
- Kept for 3 years
- Maintained at the home facility of the marine mammal, AND
- Maintained at the facility where the marine mammal died, if different than the home facility

### 6.3.2. Non-Required Information

The following information is **not** required but may be helpful for the licensee to gain and maintain compliance:

- Animal observation and treatment logs which could include:
  - Documentation of an acute or chronic medical issue
  - Documentation of contact with the attending veterinarian
  - Treatment prescribed by the attending veterinarian
  - Treatment records, *i.e.*, dates and times of treatment if applicable
  - Results of treatment
- Attending veterinarian approval of noncommercial diet for large felids
- Enrichment logs for NHPs
- Feeding of young animals, such as bottle feeding
- Vaccination and preventive health records (individual animal or group/litter)
- Necropsy records (for animals other than marine mammals)
- Surgery records
- Euthanasia records
- Cage wash validation sheets
- Room maintenance logs
- Standard operating procedures, if available

### 6.3.3. Traveling Exhibitors

Traveling exhibitors should have the appropriate records with them on the road, as detailed in this section. See Traveling Exhibitor Inspection in Chapter 4 for more information.

## 6.4. Inspection Guidance

### 6.4.1. General Information

All of the covered animals and the facility's program of veterinary care and veterinary care practices and records should be thoroughly reviewed during the inspection. The information in this section is provided for your guidance but all citations must be based on the Regulations and Standards. If you are unsure, you should contact your SACS.

### 6.4.2. Adequate Veterinary Care

Sections 2.33 and 2.40 require regulated facilities to establish and maintain "programs" of adequate veterinary care. The purpose in requiring a program of adequate veterinary care is to ensure that facilities attend to the health needs of animals. The program of adequate veterinary care must include having appropriate facilities, personnel, equipment, and services to comply with the Regulations; appropriate methods to prevent, control, diagnose, and treat diseases and injuries, including emergency and weekend care; daily observation of all animals to assess their health and well-being; guidance by the attending veterinarian to personnel in animal care and use techniques, including the use of pain-relieving drugs and euthanasia; and adequate pre-procedural and post-procedural care. Upon inspection, you should evaluate the appearance and condition of the animals as well as the facility, to determine whether the overall veterinary care program is adequate to ensure that proper care is being rendered, and whether the facility is following its written program of veterinary care.

An animal is considered to have received adequate veterinary care if it has been:

- Discussed with or examined and evaluated by a qualified veterinarian (either the attending or a consulting) in a timely manner, **and**
- Prescribed a treatment **plan** which is appropriate for the animal's condition, **potentially** including further observation without treatment if appropriate, **and**
- Treatments have been administered as prescribed

The outcome of the treatment is **not** the determining factor for the adequacy of veterinary care, provided that the care is in keeping with appropriate standards of veterinary care.

If the treatment plan provided was not adequate, appropriate or timely, the inspector may contact his/her SACS for additional guidance if needed.

#### 6.4.2.1. Determining Adequate Veterinary Care

If there are **minor** veterinary issues (*e.g.*, nails, teeth, minor injuries, and eyes) with little or no discernible impact on an animal's overall health **and** that are



observed in only a small number of the facility's animals, **and** the issues can be rapidly addressed, a facility is maintaining adequate veterinary care because, overall, the facility has demonstrated it has an ongoing program that provides adequate care to animals and is, therefore, in compliance.

If an inspector identifies one or more animals with **serious** veterinary issues that require medical attention, or more than a small number of animals experiencing minor veterinary conditions (as described above), the inspector should determine if the facility is in compliance for adequate veterinary care.

Facility is **in compliance** if:

1. The veterinary care issue **was** identified by the facility prior to your inspection **and** the facility is authorized (for example, in the PVC or an SOP) to provide treatment for the condition without contacting the attending veterinarian, **and** the treatment plan is being followed, **and** the animal appears to be responsive to the treatment, **or**
2. The veterinary care issue **was** identified by the facility prior to your inspection, **and** the facility contacted the attending veterinarian (verified by the inspector through records, receipts and/or treatment logs **or** by contact the AV), **and** the treatment plan is being followed, **and** the animal appears to be responsive to the treatment, **or**
3. The veterinary care issue **was** identified by the facility prior to your inspection, **and** the facility is following the authorized treatment plan or has contacted the attending veterinarian, **and** the treatment plan is being followed **but** does not appear to be effective (*i.e.*, the animal's condition is clearly declining or worsening), **and** the licensee has re-contacted the attending veterinarian for additional instructions and is following those instructions (verified by the inspector through records, receipts and/or treatment logs, **or** by contacting the AV), **or**
4. The veterinary care issue occurred **after** the last daily observation on that day, **or**
5. The veterinary care issue could not have been observed by the facility **and** the facility did not have a 2.40(b)(2) or (b)(3) citation within the last 3 years

Facility is **not** in compliance if:

1. The veterinary care issue was **not** identified by the facility prior to your inspection, **and** veterinary care issue occurred **prior to** the daily observation for that day, **and** the facility is authorized to provide treatment but the attending veterinarian's treatment is not being followed, **and** you have contacted the attending veterinarian and the attending veterinarian is not comfortable with the facility's treatment or management of the issue, **or**
2. The veterinary care issue was **not** identified by the facility prior to your inspection, **and** veterinary care issue occurred **prior to** the daily observation for that day, **and** the facility did contact the attending veterinarian but the treatment is not being followed, **and** you have contacted the attending

veterinarian and the attending veterinarian is not comfortable with the facility's treatment or management of the issue, **or**

3. The veterinary care issue was **not** identified by the facility prior to your inspection, **and** veterinary care issue occurred **prior to** the daily observation for that day, **and** the facility did not contact the attending veterinarian, **and** the facility had a 2.40(b)(2) or (b)(3) citation within the last 3 years, **or**
4. The veterinary care issue was **not** identified by the facility prior to your inspection, **and** the veterinary care issue occurred **prior to** the daily observation for that day, **and** the facility did not contact the attending veterinarian, **and** the facility did not have a 2.40(b)(2) or (b)(3) citation within the last 3 years, **and** the veterinary care issue should have been observed by the facility

### 6.4.3. Guidance for Communicating with the Attending Veterinarian

If the inspector cannot determine from facility records, receipts, and/or treatment logs if the attending veterinarian was contacted, **the next step is to contact the attending veterinarian.** In most situations, a telephone call with the attending veterinarian is sufficient to confirm communication with the licensee, whether or not the attending veterinarian was consulted, and what if any instructions were given to the licensee.

If the attending veterinarian confirms that he/she was contacted by the licensee about the animal, and the licensee is following the instructions, then the licensee is in full compliance with the provision to provide adequate veterinary care

If the attending veterinarian has not been contacted, and/or instructions are not being followed, cite the NCI under the appropriate paragraph in 2.40 for failure to provide adequate veterinary care

If the inspector needs to contact the attending veterinarian, the following guidance should be followed:

- The inspector should make two attempts to contact the attending veterinarian using the number provided by the licensee, leaving messages after each attempt. The first call should be made after the animals have been observed, and a second call should be attempted during the exit interview.
- If the attending veterinarian doesn't return the calls, the inspector should ask the licensee for assistance with communicating with the attending veterinarian
- If the contact with the attending veterinarian cannot be made while on site, explain to the licensee that if the attending veterinarian does not respond within the following two business days, then an NCI will be cited under 2.40 for failure to provide adequate veterinary care
- During the exit interview, explain that although not required, it would be helpful in the future for the licensee to keep a record of visits or other communications with the attending veterinarian that includes the date, time,

animal ID, and treatment and/or observation/follow up instructions

- If by the morning of the second business day the inspector has not heard from the attending veterinarian, notify the licensee that morning that the attending veterinarian has not communicated with you. And advise the licensee that if you don't hear from the attending veterinarian by COB, you will be issuing a report with a citation.
- If an inspector believes it would be best to meet with the attending veterinarian in person, he/she should contact the attending veterinarian ahead of time, to make sure a time convenient for the attending veterinarian is arranged:
  - Note: if the licensee prefers, he/she should initially contact the attending veterinarian to help set up a call or meeting
  - If ACIs do not have an established relationship with the attending veterinarian, it will often help to involve a VMO or SACS in the first meeting
- When communicating with the attending veterinarian, you must always:
  - Be respectful
  - Be professional
  - Be cognizant of his/her time
  - Inform him/her of Attending Veterinarian module on our website
  - Provide our AV-related tech notes and extension pamphlets (as available)
  - Thank them for their time
- When communicating with the attending veterinarian:
  - Introduce yourself and that you are conducting an inspection of the USDA licensed/registered facility, and provide the name of the licensee
  - Explain that the purpose of the call is to simply confirm whether or not they have examined and/or communicated instructions for the veterinary medical condition of the specific animal of concern. Provide the species, breed, color, age, gender, ID number, and location of the animal.
  - Conclude the conversation by thanking them for their time, and offer your phone number in case they would like to contact you in the future for any reason
  - Do not challenge the attending veterinarian's diagnosis or instructions
  - If the attending veterinarian states that communication or treatment took place, we accept that fact
  - We do not pay consulting fees for attending veterinarians (should that come up in conversation)
- If you have not had the opportunity to meet with the attending veterinarian

at a facility, consider reaching out to introduce yourself and see if they have any questions about attending veterinarian responsibilities under the AWA proactively, before the need arises. Building a relationship and open line of communication with attending veterinarians will help ensure animal welfare and facilitate discussions regarding specific animals and treatments in the future as needed.

#### 6.4.4. Recognition of Pain and/or Distress

It is often difficult to assess pain and/or distress in animals because of a lack of methods to validate and objectively measure the pain or distress. Additionally, not all animals demonstrate pain or stress in a similar manner. Basic biology, natural history, and individual variation all have a significant impact on the demonstration of clinical signs associated with pain. Listed in Table 6-1 are some possible signs of pain or distress.

However, presence of these signs does not necessarily mean the animal is in pain or distress. Or a lack of these signs also does **not** mean that the animal is **not** in pain or distress. If you see conditions that are likely painful and animals are not showing clear signs, or if you are seeing signs that are suggestive of pain/distress and are unsure of why, you should contact your SACS or the appropriate Species Specialist for help with interpreting the situation.

**Table 6-1. Signs of Pain and/or Distress**

Species	Species-Typical Signs of Pain
Dogs	Quiet, reluctant or unwilling to move, abnormal posture, lameness, lack of alertness, whimpering, groaning, howling, shivering, loss of appetite, increased respiration, growl or exhibit apprehension when approached, looking at, licking at, rubbing, or chewing a wound or potentially painful area, response elicited when touching or manipulating an area (withdrawal, whine, snap, etc.)
Cats	Ungroomed/unkept appearance, greasy hair coat, quiet/withdrawn, apprehensive facial expression, loss of appetite, crying, hissing, hiding (often in litter box), crouching, or hunching, purring, tail flicking, response to handling (often aggressive but individuals may also purr in combination with other signs)
Guinea Pigs	Quiet, lethargy, decreased activity, decreased food and water consumption, anorexia, rough hair coat, reluctance to move, sunken eyes
Hamsters and Gerbils	Decreased activity, piloerection, ungroomed appearance
Rabbits	Inactivity, appear apprehensive or anxious, hunched appearance, hide, squeal or cry, possible aggressive behavior with excessive scratching and licking, facial expression (tightening of eye, cheek flattening, nostril tightening, pulling back whiskers, tightening ears)

Species	Species-Typical Signs of Pain
Nonhuman Primates	May mask signs of pain, appearance of misery and/or dejection, huddling or crouching, stops eating/drinking, sad expression, moaning, screaming, stops grooming, clenching of teeth, self-directed injuries, licking / chewing at injury, impaired used of limb, guarding behavior, dilated pupils
Marine Mammals Cetaceans: dolphins, porpoises, and whales	Tend to mask illness/pain, arching/hunching, squinting, one or both eyes closed, regurgitation, inappetence, changes in behavior, unusual posture in pool, floating at surface or sinking to the bottom, reduced activity, animal isolating itself from others in pool, dull or excessive sloughing of skin
Marine Mammals Pinnipeds: Seals, Sea Lions, Walrus	Typically stoic, laying with flippers tucked to sides, decreased activity, reduced alert behavior, rubbing / biting affected areas, blinking, squinting / one or both eyes closed, decreased time in pool, social isolation, decreased appetite, excessive vocalization (especially walrus)
Bears	Typically stoic, may show decreased foraging / appetite, decreased locomotion, slow / reluctant to move, development of stereotypic behaviors
Big Cats	Typically stoic, may show slow / weak / abnormal gait, obvious lameness, reluctance to rise / ambulate, hair pulling, chewing / biting, quiet depressed attitude / lethargic, eyes frequently squinting or closed. Note: young cubs that are excessively handled may be too weak, cold, or exhausted to show overt signs of distress or pain.
Elephants	Often subtle and hard to detect. Lameness, shifting weight, "bucket stance", localized heat / swelling, reluctance or slow response to per- form trained behaviors, movement away from touch (by trainers), head pressing, trunk pressing, restlessness / touching abdomen / kicking abdomen (similar to colic in a horse), excessive blinking (eye pain), changes in ear flapping frequency, decreased appetite (though chewing hay may also be a soothing behavior)
Cattle	Dull, depressed appearance, heads bowed, lack of alertness, loss of appetite, rapid/shallow breathing, rigid posture
Pigs	Changes in overall demeanor, social behavior, gait and posture, unwilling to move, hiding, excessive squealing when handled
Sheep and Goats	Similar to cattle and vocalization, teeth grinding, increased lip curling, isolation from the flock
Exotic Hoof stock	Similar to other ruminants, although individuals may be more adapted to hiding overt signs of pain, lameness, gait abnormalities, misshapen hooves (with long-term weight bearing abnormality)

#### **6.4.4.1. Signs of Distress**

Possible signs of distress in an animal include, but are not limited to:

- Change in the animal's behavior
- Abnormal behavior, such as stereotypies
- Abnormal respiration (shallow, rapid, panting, etc.)
- Reduced grooming
- Runny, glassy or unfocused eyes
- Hunching or cowering in a corner of the cage
- Changes in body weight
- Absence of alertness or inattention to ongoing stimuli
- Vomiting
- Decrease in appetite and water intake
- Intense or frequent vocalizations
- Hair plucking and self-trauma
- Young animals dispersing from nests/dens (such as seen with heat stress)

It is important to remember that signs of distress such as the presence of stereotypic behaviors may outlast the cause for the development of those behaviors. If you observe abnormal behavior such as stereotypic behavior it is important to discuss the behavior with the facility to determine when the behavior began and what is being done (if anything) to address the behavior. If you are unsure if an animal is exhibiting signs of either pain or distress, or whether the facility's response is adequate you should discuss with your SACS.

#### **6.4.5. Medication and Medical Supplies**

The inspector must ensure that all medications and medical supplies at licensed facilities are being used in a manner that is consistent with providing adequate veterinary care to prevent, control, diagnose and treat disease and injuries. [2.40(b)]

Methods to assess the use of medications and medical supplies to provide adequate veterinary care include, but are not limited to:

- The licensee has directions for appropriate use of all medications and medical supplies prescribed by a licensed veterinarian. The licensee should be able to demonstrate knowledge of the:
  - Name and concentration of the medication and appropriate use, dose, frequency, and route of administration
  - Instructions for use of the medication which may be located on a prescription label directly on the product or documented in writing from

a veterinarian, as long as the information is readily accessible, understandable, and available for use at the facility

- All medications and medical supplies are:
  - Stored within manufacturers recommended humidity and temperature range
  - Protected from light (if required)
  - Labeled appropriately, including the drug name, concentration, and expiration date if transferred out of the original container
  - Stored in a manner that prevents contamination
- Expired medications or medical supplies are NOT being used for covered animals
- If expired medications or medical supplies are present at the facility, to avoid misuse the inspector may *recommend* that they be:
  - Clearly labeled “expired”
  - Separated from other medications and medical supplies

#### 6.4.5.1. Medications of Special Welfare Concern

The licensee must establish and maintain programs of adequate veterinary care that include:

- Adequate guidance to personnel involved in the care and use of animals regarding handling, immobilization, anesthesia, analgesia, tranquilization and euthanasia [2.40(b)(4)]

Certain medications used for these procedures present special animal welfare concerns, particularly when used by non-veterinarians without the direct supervision of a veterinarian. Listed below are some methods to assess the proper use medications for these purposes.

##### 6.4.5.1.1 Paralytics or Neuromuscular Blocking Drugs

The use of paralytic or neuromuscular-blocking drugs without direct veterinary administration, oversight and care (including the use of general anesthesia and respiratory support) is **not** consistent with providing adequate veterinary care [2.40(b)(2), 2.40(b)(4)].

##### 6.4.5.1.2 Anesthetics and Controlled Drugs

The use of anesthetics, including certain controlled drugs, by non-veterinarians without the direct supervision of a veterinarian, may not be consistent with providing adequate veterinary care.

If you identify anesthetics during an inspection, you should visit with the licensee and review available records of use and determine how the facility uses the drugs, including but not limited to:

- Species
- Purpose
- Administration practices, including dosing, route of administration, and names/doses of any drugs given with it
- Monitoring practices during and after administration
- Supportive care provided
- Procedures or handling occurring after administration
- Training and qualifications of individuals giving the drug(s)

Anesthetics, including certain controlled drugs, should:

- Be used in accordance with any local, state or federal laws
- Be used according to the written instructions for use by the veterinarian, including dose, frequency, and route of administration
- Only be used by personnel with appropriate training to ensure the anesthetics are used in a method that is consistent with providing appropriate veterinary care (see below)
- Be stored within manufacturers recommended humidity and temperature range and protected from light (if required)
- Be stored in a manner that prevents contamination

If the individual(s) administering the anesthetics is not a veterinarian or is not directly supervised by a veterinarian, then you should assess the training and qualifications of the individual by inquiring about his/her ability to:

- Monitor vital signs such as respiration, heart rate, and hydration status
- Recognize the effects of the drug, including signs of overdose or underdose
- Recognize when medical intervention is necessary and what steps to take

#### **6.4.6. Surgeries and Specialized Surgical Procedures**

The licensee must establish and maintain programs of adequate veterinary care that include, but are not limited to:

- The availability of appropriate facilities, personnel, equipment, and services to comply with the Regulations and Standards
- The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries
- Adequate guidance to personnel involved in the care and use of animals regarding handling, immobilization, anesthesia, analgesia, tranquilization, and euthanasia
- Adequate pre-procedural and post-procedural care in accordance with established veterinary medical and nursing procedure [2.40(b)(5)]



If surgeries and/or specialized surgical procedures are being performed at a licensed facility, the inspector should ensure that:

- The attending veterinarian has been consulted by the licensee
- The licensee is following all of the attending veterinarian's guidance
- All animals are receiving adequate veterinary care
- All procedures are being conducted consistent with standard veterinary practice

The inspector should evaluate the qualifications and assess the adequacy of training of non-veterinarians conducting surgeries. Sample questions that you could ask the personnel about the procedures they are performing include but are not limited to:

- What are the signs of pain and distress and related-questions, such as:
  - Describe the drug regimen that will be used
  - Describe anticipated effect of the drug
  - Describe the signs of pain relief
  - Describe when further intervention may be necessary
  - What is the plan if the pain is not relieved
  - When will the veterinarian be called
- Describe the aseptic technique used, including use of gloves, masks, tools, and steps taken to appropriately clean the area and equipment between animals
- Describe the steps of the procedure to ensure they are following guidance from the attending veterinarian and verify appropriate veterinary care
- Which vital signs are being monitored and related questions such as:
  - Describe the operation of the monitoring equipment
  - Describe the interpretation of the results of the monitoring
- Describe the length and interval of monitoring and when it will be discontinued
- Describe ability to recognize and respond to potential veterinary medical emergencies that could occur, including excessive bleeding, cessation of breathing, or other potential complications and related questions, such as:
  - When is medical intervention necessary
  - What medical intervention will be used
  - What equipment available for medical intervention and how is it operated
  - When will the veterinarian be called

### 6.4.7. Euthanasia Guidance for Inspections

The Animal Welfare Act Regulations (AWAR) define “euthanasia” (9 C.F.R. § 1.1) as:

- The humane destruction of an animal accomplished by a method that produces rapid unconsciousness and subsequent death without evidence of pain or distress, **OR**
- A method that utilizes anesthesia produced by an agent that causes painless loss of consciousness and subsequent death

This is the regulatory standard inspectors must apply when determining whether a method of euthanasia is compliant with the AWA. Facilities, in consultation with their attending veterinarian, may determine the humane method of euthanasia they wish to use provided it meets the regulatory standard.

AVMA Guidelines on Euthanasia

- The methods of euthanasia listed as “Acceptable” or “Acceptable with Conditions” (when conditions are met) in the American Veterinary Medical Association’s (AVMA) Guidelines on Euthanasia meet the regulatory definition of euthanasia, and facilities may consider the AVMA guidelines as a source that describes humane methods of euthanasia that are compliant.
- The AVMA Guidelines themselves cannot be enforced because they are not part of the Regulations. This means an inspector **cannot cite a facility** for the failure to provide adequate veterinary care because the facility’s method of euthanasia is not listed as an “acceptable” or “conditionally acceptable” (with conditions met) method of euthanasia in the AVMA Guidelines. Instead, the inspector must assess whether the facility’s method of euthanasia meets the regulatory definition above, and, if not, explain in the citation how the method does not meet the definition.

#### 6.4.7.1. Methods of Euthanasia Listed as “Acceptable with Conditions” in the AVMA Guidelines

If the method of euthanasia is “acceptable with conditions,” the inspector must confirm the facility is following the specified conditions by:

- Reviewing the program of veterinary care (PVC), **and**
- Asking the licensee/registrant questions and/or visiting with the attending veterinarian (AV)

#### 6.4.7.2. Methods of Euthanasia Not Listed as Acceptable or Acceptable with Conditions in AVMA Guidelines

To assess whether a method meets the regulatory definition, the inspector must discuss the method with the licensee and the attending veterinarian **and** review:

- The method of euthanasia the attending veterinarian approved for use at the

facility

- How the method of euthanasia is administered
- The factors the licensee and attending veterinarian considered when adopting the method
- What equipment is required to carry out the method
- The observation of the animal and its behavior/appearance before, during, and after applying the method
- How the animal's death is confirmed
- The timeframe between administering the method and the animal's death
- Any other questions the inspector thinks are relevant to assessing compliance with the regulatory standard

#### 6.4.7.3. Method of Euthanasia Not on the PVC or as Described by the AV

If the facility is using a method of euthanasia that is not the same method listed in the PVC or described by the attending veterinarian, and the facility is performing the euthanasia, the inspector should include a citation on the Inspection Report under 2.40(b)(4) for using a method of euthanasia not consistent with the attending veterinarian's guidance.

#### 6.4.7.4. Facility Conducting Euthanasia

**If a facility is conducting euthanasia**, the inspector should determine whether:

1. The person the attending veterinarian approved to perform the specific method of euthanasia is performing the euthanasia, and
2. The attending veterinarian provided the person(s) with adequate training and guidance for properly conducting the euthanasia, and
3. The facility maintains appropriate facilities, equipment and/or supplies
4. If any of these conditions are **not** met, the inspector should include a citation on the Inspection Report under 2.40(b)(4) for lack of adequate guidance and/or 2.40(b)(1) for lack of appropriate facilities, equipment, or supplies

#### 6.4.7.5. Other Important Notes

- Euthanasia conducted under emergency conditions may require extreme measures, and inspectors who encounter situations like this should discuss them with their SACS
- Assessing compliance involves applying the regulatory definition of euthanasia. Any noncompliance involving euthanasia should describe why the method does not meet the regulatory definition. A method of euthanasia not found in the AVMA Guidelines is not necessarily a noncompliance with the Regulations. Citations in Inspection Reports and

justifications in inspection appeals must focus on the regulatory definition of euthanasia, and must not rely upon (or reference) the AVMA Guidelines.

- If needed, the SACS and inspector can request guidance from the AWO on whether the method meets or does not meet the regulatory definition of euthanasia. If the AWO determines the method of euthanasia does not meet the regulatory definition, AWO will issue a written correspondence to the facility to convey the determination to the facility and the attending veterinarian, and will list available resources pertaining to the humane euthanasia of animals (including the AVMA Guidelines, the Canadian Council on Animal Care Guidelines on: Euthanasia of Animals Used in Science (which can be found at <http://www.ccac.ca/Documents/Standards/Guidelines/Euthanasia.pdf>), and guidelines in the European Food Safety Authority Journal, pp 25-42 (which can be found at <http://onlinelibrary.wiley.com/doi/10.2903/j.efsa.2005.292/epdf>))

### 6.4.8. Additional Requirements for Inspecting Dogs

For all **Routine Inspections**, you, the inspector, should:

- Ask the licensee to pull from the enclosure any dog showing signs of a medical issue if you need have a closer look and take photos and/or a video to document any veterinary care noncompliance
- Ask the licensee to pull any dogs that were previously identified as having a medical issue to recheck the dog if you need a closer look
- Inspect the entire dog for medical issues; do not just focus on a single specific area
- Check for proper identification
- Select a few random dogs and check their mouths, ears, eyes, skin, and general condition

For all **Prelicense Inspections**, you, the inspector, should:

- Ask the applicant to pull from the enclosure any dog showing signs of a medical issue if you need to have a closer look
- Ask the applicant to pull any dogs that were previously identified as having a medical issue to recheck the dog if you need a closer look
- Inspect the entire dog for medical issues; do not just focus on a single specific area
- Select 10 percent of the remaining dogs (up to maximum of 10 dogs) for the applicant to pull and check for medical issues associated with their mouths, ears, eyes, skin, general condition, etc. If you identify a veterinary care issue that would normally be cited during a Routine Inspection, then it must be cited on the Inspection Report for the Prelicense Inspection.

**NOTICE**

Remember to use proper biosecurity measures.

**6.5. Documentation of Veterinary Care NCIs**

**6.5.1. Citing Section 2.40(b)(2) or 2.40(b)(3)**

**6.5.1.1. Section 2.40(b)(2)**

Section 2.40(b)(2) is cited whenever a sick or injured animal:

- Has **not** been evaluated by the veterinarian either via a physical examination or consultation, or
- Lacks a post-treatment re-evaluation if the veterinary care issue is not resolved, or
- Is not being treated according to the treatment plan in the written program of veterinary care or as instructed by a veterinarian

Correction of this NCI usually involves a consult or examination by a veterinarian, whichever is more appropriate.

**6.5.1.2. Section 2.40(b)(3)**

Section 2.40(b)(3) is cited when the facility has a problem where sick or injured animals are not receiving appropriate veterinary care due to:

- Inadequate or no daily observation to identify sick/injured animals, and/or
- Lack of timely communication with the veterinarian on issues of animal health

Correction of this NCI involves either adequate daily observation and/or timely communication with the veterinarian about issues of animal health.

**NOTICE**

Section 2.40(b)(2) and (b)(3) should **not** both be cited for the same animal(s). The inspector should cite the most appropriate Regulation.



# Chapter 7. Research Facility Inspection

## IACUC Requirements and Protocols

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**DISCLAIMER**

The Animal Welfare Inspection Guide is intended to be a reference document to assist the inspector. The Inspection Guide does not supersede the Animal Welfare Act (AWA), the AWA Regulations and Standards, AC policies and other guidance, the Required Inspection Procedures, standard procedures, or the inspector’s professional judgment. All inspection decisions must be justified by applicable sections of the AWA and/or the AWA Regulations and Standards.



**NOTICE**

The AWA specifically prohibits Animal Care from stopping research at any research facility (registered or unregistered but requiring registration). Therefore, you (the inspector) may NOT instruct a research facility to stop conducting research under any circumstances. [AWA 2143(a)(6)(A)]

**7.1. IACUC Review Information for the Inspector****7.1.1. General Information**

All IACUC responsibilities, functions, and activities must be completely and thoroughly reviewed.

**7.1.1.1. Membership**

In assessing IACUC membership, you should look for verification that:

- All required positions are filled

**NOTICE**

If a required position(s) is unfilled, there is not a properly constituted IACUC. An improperly constituted IACUC cannot perform the required official AWA functions.

- The DVM has acceptable experience and responsibility for animal care and delegated authority for activities
- The nonaffiliated member represents the general public, *i.e.*, has no conflict of interest either personally or financially, and is not a laboratory animal user at any research facility
- There are no more than three members from one administrative unit of the research facility, unless the facility is so small that it only has one administrative unit
- IACUC members are qualified to assess the research facility's animal program, facilities, and procedures
- IACUC members are properly trained and instructed in areas such as:
  - The Animal Welfare Act
  - Protocol review
  - Program review
  - Facility inspection

### 7.1.1.2. Meetings

In assessing meetings, you should look for verification that:

- All members are informed of all meetings
- Meetings are held at a time when all members, especially the nonaffiliated member, can attend
- Required members (committee chair, nonaffiliated member, and attending veterinarian) are in attendance at most meetings. (There is no requirement that all required members must be in attendance at all meetings.)

#### NOTICE

If any required member is absent from a substantial number of meetings, the research facility may need to find a different person to fill the position.

- All members have access to information distributed, *e.g.*, if sent only over email, all members must have email
- All members are sent information for an IACUC meeting in sufficient time prior to the meeting to be able to review the information
- All members receive a list of protocols, or the actual protocols to be reviewed, in sufficient time to participate in the review or request a full committee review
- There is a mechanism for a member to request a full IACUC review of a protocol or participation in the appointed subcommittee review
- If a member requests a full IACUC review of a protocol, a full IACUC review is conducted

### 7.1.1.3. Minutes

The IACUC meeting minutes should include:

- A list of members who attended and/or who did not attend
- All the activities conducted by the IACUC at the meeting
- Any dissenting opinions
- Approval of the minutes (usually of the previous meeting) by the IACUC (recommended, but not required)
- Substance of the deliberations of the IACUC, not just the decisions reached

#### NOTICE

For requirements for conducting meetings using telecommunications, see [Telecommunications for IACUC Meetings](#) and [Electronic Communication](#).

### 7.1.2. Program of Humane Care and Use Review

In assessing the program review, you should look for verification that:

- The review is being conducted at least once every 6 months

#### NOTICE

The USDA is in agreement with OLAW that the timing of the Facility Inspection can include flexibility of within 30 days of the 6 month interval from the last Review, as long as there is not forward drift of the date from year to year. To avoid forward drift, the IACUC should consider scheduling Program Reviews during the same calendar month from year to year.

- If the IACUC adopted the AAALAC International Program Assessment report as its semiannual program review, the following requirements were met:
  - The report complied with section 2.31(c)(1) and (3)
  - At least two members of the IACUC assisted in conducting the inspection
  - **No** IACUC member wishing to participate in any evaluation was excluded
  - The report was signed by a majority of the IACUC members (individual digital signatures are acceptable)
  - The report:
    - included any minority views
    - distinguished minor from significant deficiencies
    - contained a reasonable and specific plan and schedule with dates for each deficiency
    - was submitted to the Institutional Official (IO) in a timely manner
- All members are informed of the program review to be conducted by the appointed subcommittee in sufficient time to request participation
- Any member who wants to participate in the program review is allowed to do so
- The program of humane care and use addresses all of the required areas
- Any identified departure from the AWA Regulations and Standards includes a description of and reason for the departure
- If a departure occurred due to a program deficiency, then there is a:
  - Classification of the deficiency as a significant deficiency or a minor deficiency

**NOTICE**

A significant deficiency is one which is, or may be, a threat to the health or safety of the animal.

- o Description of a reasonable and specific plan for correcting the deficiency
  - o Schedule with dates for correcting the deficiency
- A report of the IACUC program review:
  - o Is completed
  - o Is signed by a majority of the members (individual digital signatures are acceptable)
  - o Contains any minority views
  - o Is submitted to the Institutional Official (IO) in a timely manner
- Any uncorrected significant deficiency was properly reported to Animal Care and other appropriate Federal agencies

**7.1.3. Facility Inspection**

In assessing the facility inspection, you should look for verification that:

- The facility inspection is being conducted at least once every 6 months

**NOTICE**

The USDA is in agreement with OLAW that the timing of the Facility Inspection can include flexibility of within 30 days of the 6 month interval from the last Review, as long as there is not forward drift of the date from year to year. To avoid forward drift, the IACUC should consider scheduling Program Reviews during the same calendar month from year to year.

- If the IACUC adopted the AAALAC International Program Assessment report as its semi-annual facility inspection, the following requirements were met:
  - o The report complied with section 2.31(c)(2) and (3)
  - o At least two members of the IACUC assisted in conducting the inspection
  - o No IACUC member wishing to participate in any evaluation was excluded
  - o The report was signed by a majority of the IACUC members
- The report:
  - o included any minority views
  - o distinguished minor from significant deficiencies
  - o contained a reasonable and specific plan and schedule with dates for each deficiency

- was submitted to the IO in a timely manner
- All members are informed of the date and time of the facility inspection
- All members are informed of the facility inspection to be conducted by the appointed committee in sufficient time to request participation
- Any member who wants to participate in the facility inspection is allowed to do so
- All of the animal holding, housing, and use areas are inspected
- Any identified departure from the AWA Regulations and Standards includes a description and reason for the departure
- If a departure occurred due to a program deficiency, then there is a:
  - Classification of the deficiency as a significant deficiency or a minor deficiency

#### NOTICE

A significant deficiency is one which is, or may be, a threat to the health or safety of the animal.

- Description of a reasonable and specific plan for correcting the deficiency
- Schedule with dates for correcting the deficiency
- A report of the IACUC facility inspection:
  - Is completed
  - Is signed by a majority of the members (individual digital signatures are acceptable)
  - Contains minority views
  - Is submitted to the IO in a timely manner
- Any uncorrected significant deficiency was properly reported to Animal Care and other appropriate Federal agencies

#### 7.1.4. Reports to the Institutional Official

In assessing the reports to the IO, you should look for verification that:

- A report(s) is submitted at least every 6 months, after each program review and facility inspection
- There is a description of how and to what extent the research facility meets the AWA Regulations and Standards, such as:
  - Facility is in total compliance and description, or
  - Describes each item not in compliance (deficiency)
- Any identified departure from the AWA Regulations and Standards includes a

description and reason for the departure

- If a departure occurred due to a program deficiency, then there is a:
  - Classification of the deficiency as a significant deficiency or a minor deficiency

**NOTICE**

A significant deficiency is one which is, or may be, a threat to the health or safety of the animal.

- Description of a reasonable and specific plan for correcting the deficiency
- Schedule with dates for correcting the deficiency
- Recommendations to the IO regarding any aspect of the facility’s animal program, facilities, and personnel training are included in the report
  - The report is signed by a majority of the members (individual digital signatures are acceptable)
- The report contains any minority views
- Other reports to the IO which should be requested and reviewed include, but are not limited to:
  - Notice of suspension of a protocol
  - Uncorrected significant deficiencies

You should review how the reports are sent to the IO.

**NOTICE**

If you have a concern that the Institutional Official is not receiving the required reports/information or acting on the required reports/information, you should visit with the IO.

**7.1.5. Protocol Activity Suspension**

In assessing the IACUC’s suspension of protocol activities, you should look for verification that:

- The activity was reviewed and suspended at a convened meeting with a quorum of the IACUC present

**NOTICE**

A quorum means a majority of the Committee members.

- The suspension was approved by majority vote of the quorum present
- The IO, in conjunction with the IACUC:

- Reviewed the reason for the suspension
- Took appropriate corrective action
- Instituted adequate follow-up measures and monitoring of the suspended activity
- Informed the appropriate Animal Welfare Operations Office of the suspension
- Informed other appropriate Federal funding agencies of the suspension

### 7.1.6. Complaints or Concerns

In assessing the IACUC's responsibility for addressing complaints or concerns, you should look for verification that:

- Adequate methods are in place for receiving complaints or concerns from sources outside the research facility
- Adequate, confidential methods are in place for receiving complaints or concerns from sources inside the facility
- Complaints or concerns were reviewed and, if appropriate, investigated for validity

### 7.1.7. Records

In addition to the reports listed above, the following IACUC records must be available for review and in compliance with the AWA Regulations: [2.35(a)(2); 2.35(f)]

- Protocols
- Proposed significant changes to protocols
- IACUC approval or non-approval of protocols or proposed significant changes to protocols
- Any other protocol-related information

### 7.1.8. Telecommunications for IACUC Meetings

Methods of telecommunications (*e.g.*, telephone or video conferencing) are acceptable for the conduct of official IACUC business requiring a quorum, provided the following criteria are met:

- All members are given notice of the meeting
- Documents normally provided to members during a physically-convened meeting are provided to all members in advance of the meeting
- All members have access to the documents and the technology necessary to fully participate
- A quorum of Committee members is convened when required

- The forum allows for real time verbal interaction equivalent to that occurring in a physically-convened meeting (*i.e.*, members can actively and equally participate and there is simultaneous communication)
- If a vote is called for, the vote occurs during the meeting and is taken in a manner that ensures an accurate count of the vote. A mail ballot or individual telephone polling cannot substitute for a convened meeting.
- Opinions of absent members that are transmitted by mail, telephone, fax, or email may be considered by the convening IACUC members, but may not be counted as votes or considered as part of the quorum
- Written minutes of the meeting are maintained as required

### **7.1.9. Information to Review**

The information below represents supplemental information and materials that the facility can provide which can help verify or assess IACUC function.

Documents that can be reviewed to assess IACUC function may include, but are not limited to:

- Audio tapes provided by the research facility
- Cage wash water temperature certification records
- Emails and email records
- IACUC facility Inspection Reports
- IACUC-related correspondence
- Interviews with IACUC members
- Maintenance records
- Medical/surgical records
- Memos and notes
- Program of humane care and use
- Room temperature logs
- Standard operating procedures
- Written meeting minutes

## **7.2. IACUC Review Information for the Registered Research Facility**

### **7.2.1. Appointment of the IACUC**

The Chief Executive Officer of the research facility or the Institutional Official (IO) if designated by the CEO must appoint an Institutional Animal Care and Use Committee (IACUC) [2.31].



### 7.2.1.1. Criteria

The IACUC must be qualified through the experience and expertise of its members to assess the research facility's [2.31(a)]:

- Animal program
- Facilities
- Procedures

**Except** as specifically authorized by law or the Animal Welfare Act Regulations, the Animal Welfare Act and its Regulations do not authorize a research facility's IACUC to dictate to a researcher how to conduct his/her research by [2.31(a)]:

- Prescribing methods for the design or performance of research or experimentation
- Setting standards for the design or performance of research or experimentation

### 7.2.1.2. Membership

The Institutional Animal Care and Use Committee (IACUC) must be composed of a Chairperson and at least two additional members [2.31, Policy #15].

### 7.2.1.3. Members

The IACUC must be composed of [2.31(b)(2) and (3)]:

- A Chairperson
- At least one Doctor of Veterinary Medicine (DVM)
- At least one nonaffiliated member

#### NOTICE

To be a properly constituted IACUC, all three positions must be filled.  
[2.31(b)(2)]

IACUC members must be qualified to assess the research facility's animal program, facilities, and procedures. [2.31(a)] The research facility is responsible for [Policy #15]:

- Ensuring the qualifications of the members
- Providing training and instruction to the members in areas such as:
  - The Animal Welfare Act
  - Facility inspection
  - Program review
  - Protocol review

- Although not specifically prohibited by the AWA, APHIS strongly discourages one person from filling more than one of those positions, such as [Policy #15]:
- The DVM being the Chairperson
- The nonaffiliated member being the Chairperson

#### NOTICE

APHIS also strongly discourages the research facility's Institutional Officer from being the Chairperson or DVM.

If the IACUC consists of more than three members, not more than three members can be from the same administrative unit of the research facility, such as [2.31(b)(4)]:

- Biology Department
- Cardiology Department

#### 7.2.1.4. Chairperson

The Chairperson is generally responsible for the activities of the IACUC, but the responsibility for managing the IACUC may be delegated or reside in an administrative unit.

The Chairperson's activities may include, but are not limited to:

- Certifying the research facility's compliance with the AWA and its Regulations and Standards
- Informing the Principal Investigator of the IACUC's decisions regarding his/her protocol
- Assuring that records of activities are kept
- Leading the meetings
- Sending a list of protocols to be reviewed to members
- Sending the required reports to the Institutional Official
- Setting the agenda for meetings
- Scheduling meetings

#### 7.2.1.5. Doctor of Veterinary Medicine

The Doctor of Veterinary Medicine must have [2.31(b)(3)(i)].

- Ability to critically review a protocol for veterinary care issues, and
- Direct or delegated authority for activities involving animals at the research facility, and
- Training or experience in laboratory animal science and medicine

### 7.2.1.6. Nonaffiliated Member

The nonaffiliated or outside member represents the interests of the general public and must not be [2.31(b)(3)(ii), Policy #15]:

- A laboratory animal user at any research facility
- A member of the immediate family of a person who is affiliated with the research facility
- A person with financial interest in the facility, such as an animal supplier
- Compensated to an amount which jeopardizes the member's status as a nonaffiliated member
- Compensation for the nonaffiliated member may include [Policy #15].
- Meals
- Modest monetary payment which does not:
  - Become an important source of income
  - Influence voting on the IACUC
- Parking
- Travel expenses
- Examples of nonaffiliated members include, but are not limited to:
  - Bioethicists
  - Biologists
  - Clergy
  - Humane society volunteers or employees
  - Non-research staff members from other institutions
  - Physicians
  - Practicing veterinarians
  - Retirees

### 7.2.1.7. Alternate Members

There may be alternate members appointed to the IACUC by the IO.

Alternates may only serve as an alternate in the membership category(s) for which they are qualified. For example, the alternate for a non-affiliated IACUC member would need to also meet the non-affiliated member requirements.

If the regular member fulfills a specific membership requirement, his or her alternate must also fulfill that requirement. If the regular member fulfills more than one membership requirement, the alternate must meet the same membership requirements.

One alternate may be appointed to serve for multiple regular members provided the alternate fulfills the specific membership requirement of the members for whom he or she is substituting. However, an alternate may not represent more than one member at any one time.

### 7.2.2. Program Review

The IACUC must review and evaluate the research facility’s program for humane care and use of animals at least once every 6 months [2.31(c)(1)].

#### NOTICE

The USDA is in agreement with OLAW that the timing of the Program Review can include flexibility of within 30 days of the 6 month interval from the last Review, as long as there is not forward drift of the date from year to year. To avoid forward drift, the IACUC should consider scheduling Program Reviews during the same calendar month from year to year.

#### 7.2.2.1. Method

The IACUC is responsible for determining the best method for conducting the review of the humane care and use program [2.31(c)(3)].

The IACUC may [2.31(c)(3)]:

- Conduct the review with all IACUC members participating, or
- Appoint a subcommittee of at least two members to conduct the review

#### NOTICE

No IACUC member wishing to participate in the review may be excluded.

- Invite an ad hoc consultant(s) to assist with the program review
- The IACUC may adopt the AAALAC International Program Assessment report as its semi-annual program review if:
  - The report complies with section 2.31(c)(1) and (3)
  - The report is made available to the APHIS inspector upon request
  - At least two members of the IACUC assisted in conducting the inspection
  - No IACUC member wishing to participate in any evaluation was excluded
  - The report was signed by a majority of IACUC members (individual digital signatures are acceptable)
  - The report:
    - included any minority views
    - distinguished minor from significant deficiencies

- contained a reasonable and specific plan and schedule with dates for each deficiency
- was submitted to the IO in a timely manner

#### 7.2.2.2. Criteria

The review of the program of humane care and use must be based on the AWA Regulations and Standards (Title 9, Chapter I, Subchapter A—Animal Welfare) [2.31(c)(1)].

Additional resources which may be used include, but are not limited to:

- Guide for the Care and Use of Agricultural Animals in Agricultural Research and Teaching, published by the Federation of Animal Science Societies (most current edition)
- *Guide for the Care and Use of Laboratory Animals*, published by the Institute of Laboratory Animal Resources (most current edition)

Areas which should be addressed in the program of humane care and use include, but are **not** limited to:

- Animal care, such as:
  - Cleaning/sanitation
  - Environment
  - Environmental enrichment for nonhuman primates
  - Exercise for dogs
  - Food/water
  - Housing
- IACUC-approved exceptions, such as:
  - Exceptions to the cleaning or sanitation requirements
  - Exceptions to the diurnal lighting cycle requirement
  - Exceptions to the space requirement (including innovative enclosures and metabolism cages)
  - Maintaining animals at temperatures outside the ranges specified by the standards
  - Use of an animal in more than one major survival surgery (see Policy #14)
- IACUC functions, such as:
  - Attendance at meetings, especially nonaffiliated member
  - Complaint review
  - Dissemination of protocols to members
  - IACUC meeting minutes

- IACUC records
- Protocol review
- Recommendations to the IO
- Reports to the IO
- Required meetings
- Review of humane care and use program
- Review of standard operating procedures (SOPs)

#### NOTICE

There is no requirement for every SOP to be reviewed every 6 months. The IACUC may determine a reasonable schedule for review of SOPs.

- Suspended activities
- Identification
- Personnel qualifications and training
- Records
- Veterinary care, such as:
  - Anesthesia and surgery
  - Emergency, weekend, and holiday care
  - Euthanasia
  - Pain/distress management (see Policy #11)
  - Pre/post-procedural care

The findings of the program review must be included in a report to the IO [2.31(c)(3)].

### 7.2.3. Facility Inspection

The IACUC **must** inspect the research facility's animal facilities at least once every 6 months [2.31(c)(2)].

#### NOTICE

The USDA is in agreement with OLAW that the timing of the Facility Inspection can include flexibility of within 30 days of the 6 month interval from the last Review, as long as there is not forward drift of the date from year to year. To avoid forward drift, the IACUC should consider scheduling Program Reviews during the same calendar month from year to year.

### 7.2.3.1. Facilities

Animal facilities which must be inspected include, but are not limited to:

- All sites (including remote sites) where animals are housed for more than 12 hours or used (including laboratories)
- Cage cleaning areas
- Drug storage areas, including investigators' labs and offices, if appropriate
- Food and bedding storage areas
- Holding areas
- Loading docks and transport equipment, such as:
  - Transport cages
  - Vehicles
- Study areas where animals are confined for more than 12 hours
- Surgical suites and prep areas

#### NOTICE

It is strongly recommended that the IACUC inspect areas where animals are housed for less than 12 hours.

In addition to inspecting the facilities, the IACUC should conduct:

- A review of management practices
- A review of the mechanism for animal users and caretakers to report animal health problems or concerns
- An assessment of animal users and caretakers ability to recognize problems of animal health and behavior
- An assessment of the care of the animals
- An assessment of the condition of the animals
- Animal facilities which do **not** have to be inspected are:
- Areas containing free-living wild animals in their natural habitat

#### NOTICE

Field study areas are not required to be inspected [2.31(c)(2)].

- Areas used exclusively for non-regulated animals
- Housing areas at another research facility if the IACUC has delegated responsibility for the animals housed in those areas to the IACUC of the other facility

### NOTICE

The IACUC should document that it has delegated the facility inspection responsibility to the IACUC of the other research facility.

- Sites which are not in the United States or U.S. territories (foreign sites)

#### 7.2.3.2. Method

The IACUC is responsible for determining the best method for conducting the facility inspection [2.31(c)(3)].

The IACUC may:

- Appoint a subcommittee of at least two members to conduct the inspection, or

### NOTICE

No IACUC member wishing to participate in the inspection may be excluded.

- Have all of the Committee members participate in the inspection, or
- Invite an ad hoc consultant(s) to assist with the facility inspection
- The IACUC may adopt the AAALAC International Program Assessment report as its semi-annual program review if:
  - The report complies with section 2.31(c)(2) and (3)
  - The report is made available to the APHIS inspector upon request
  - At least two members of the IACUC assisted in conducting the inspection
  - No IACUC member wishing to participate in any evaluation was excluded
  - The report was signed by a majority of IACUC members (individual digital signatures are acceptable)
- The report:
  - included any minority views
  - distinguished minor from significant deficiencies
  - contained a reasonable and specific plan and schedule with dates for each deficiency
  - was submitted to the IO in a timely manner

#### 7.2.3.3. Criteria

The inspection **must** be based on the AWA Regulations and Standards (Title 9, Chapter I, Subchapter A—Animal Welfare) [2.31(c)(2)].

Additional resources which may be used include, but are not limited to:



- Guide for the Care and Use of Agricultural Animals in Agricultural Research and Teaching, published by the Federation of Animal Science Societies (most current edition)
- *Guide for the Care and Use of Laboratory Animals*, published by the Institute of Laboratory Animal Resources (ILAR) (most current edition)

The findings of the facility inspection must be included in a report to the IO [2.31(c)(3)].

#### 7.2.4. IACUC Protocol Review

The IACUC must review all protocols and significant changes to approved protocols [2.31(d)(1), Policy #11, Policy #12, and Policy #14].

##### 7.2.4.1. Criteria

In order to approve a protocol or significant change to an approved protocol, the IACUC **must** [2.31(d)(1)]:

- Review those components of the activities related to the care and use of animals, and
- Determine that the proposed activities meet and comply with the AWA Regulations and Standards, unless an acceptable justification for a departure is presented in writing

##### 7.2.4.2. General Protocol Requirements

A protocol to conduct an activity involving animals must contain and comply with the requirements/assurances detailed below.

Protocols **must** meet the following requirements:

- Provide the rationale for using animals [2.31(e)(2)]
- Identify the species of animals to be used [2.31(e)(1)]
- Provide a rationale for the appropriateness of the species [2.31(e)(2)]
- Provide the approximate number of animals to be used [2.31(e)(1)]
- Provide a rationale for the number of animals to be used, such as but not limited to [2.31(e)(2)]:
  - Required for statistically significant results (tests used or statisticians consulted should be included)
  - Based on scientific literature or past experience (references should be cited)
  - Based on results of pilot study
  - Required by the Food and Drug Administration (FDA) or other Federal agency (Federal code, Regulation, or Standard, etc., must be cited)

- Required by international testing requirements (code, Regulation, Standards, etc., must be cited)
- Number of students/animal and procedures needed to learn
- Describe the proposed use of the animals, including final disposition of the animal [2.31(e)(3)]

**NOTICE**

The description should be clear enough to be easily understood by the IACUC’s outside member.

- Contain a written assurance from the principal investigator that the proposed activities do not unnecessarily duplicate previous experiments [2.31(d)(1)(iii)]
- Medical care will be provided when necessary
- The animal’s living conditions, housing, feeding, and nonmedical care will be [2.31(d)(1)(vi)]:
  - Appropriate
  - In accordance with AWA Standards
  - Directed by the attending veterinarian or other qualified scientist
- All personnel who will be conducting the proposed activities on the animals are qualified and trained [2.31(d)(1)(viii)]
- Pain/distress/discomfort are minimized [2.31(d)(1)(i) and 2.31(e)(4)]
- Contain a complete description of procedures designed to assure the pain/distress/discomfort are minimized [2.31(e)(4)]
- Describe the method(s) of euthanasia to be used [2.31(e)(5)]

**7.2.4.3. Painful/Distressful Procedures**

Procedures that may cause more than momentary or slight pain or distress to the animal must contain and comply with assurances that the pain/distress is necessary and will be relieved or minimized. [2.31(d)(iv)(A)]

Some procedures that can be expected to or may cause more than momentary pain or distress include, but are not limited to: (see Policy #11)

- Extensive irradiation, inhalation toxicity, or tumor growth studies
- Food or water deprivation or restriction beyond that necessary for normal pre-surgical preparation
- Forced exercise
- Noxious electrical shock or thermal stress that is not immediately escapable
- Ocular or skin irritancy testing

- Paralysis or immobility in a conscious animal
- Surgery (survival or terminal)
- Use of Freund's Complete Adjuvant

Protocols with procedures that may cause pain or distress must meet the following requirements:

- The principal investigator(s) (PI) has considered alternatives to the painful/distressful procedure [2.31(d)(1)(ii)]. The PI should consider:
  - Refinement alternatives that may further minimize or avoid pain and/ or distress
  - Reduction alternatives that may reduce the number of animals required to attain study objectives
  - Replacement alternatives that may allow some or all of the scientific objectives to be attained without the use of live animals, or with the use of phylogenetically lower species
- If the consideration of alternatives is done by an electronic database search, then a written narrative describing the methods and sources used to determine that alternatives were not available should include, but is not limited to [2.31(d)(1)(ii), see Policy #12]:
  - Date of the search
  - Database(s) searched
  - Years covered by the search
  - Search strategy(ies) used
- If the consideration of alternatives is done by other means, then a written narrative describing the methods and sources used to determine that alternatives were not available should include, but is not limited to [2.31(d)(1)(ii), see Policy #12]:
  - Years covered by the consideration
  - Consideration strategy(ies) used
  - Sources consulted, including, if applicable:
    - Reliable unpublished research data
    - Expert consultation (list credentials)
- Painful/distressful procedures will be performed with appropriate [2.31(d)(1)(iv)(A)]:
  - Sedatives
  - Analgesics
  - Anesthetics
- If painful/distressful procedures will be performed without the appropriate

sedative, analgesics, or anesthetics, then withholding such agents must [2.31(d)(1)(iv)(A)]:

- Be in writing, and
  - Detail the justification for scientific reasons for withholding these agents, and
  - State the period of time (if known) that these agents will be withheld, or
  - Have an assurance statement that these agents will be withheld for the shortest period of time necessary
- The research facility's attending veterinarian or his/her designee was consulted and involved in the planning of the procedure and pain/distress relief [2.31(d)(1)(iv)(B)]
  - Procedures will not include the use of paralytics without anesthesia [2.31(d)(1)(iv)(C)]

Animals experiencing severe or chronic pain/distress that cannot be relieved will be humanely euthanized [2.31(d)(1)(v)] See [Table 7-1 Species-Typical Signs of Pain](#).

#### **7.2.4.4. Surgical Procedures**

##### **7.2.4.4.1 Pre- and Post-Surgical Care**

Protocols that involve surgery must detail the provisions for pre- and post-operative care of the animals in accordance with accepted veterinary and nursing practices, such as [2.31(d)(1)(ix)]:

- Adequate monitoring of recovery
- Adequate post-procedural observation and monitoring
- Placing animal in appropriate recovery or post-recovery environment

For pain/distress-relieving drugs, the protocol should clearly specify or there should be IACUC-approved policies (*e.g.*, guidance documents, standard operating procedures, drug formularies) for the provision of medication to minimize discomfort or pain, including but not limited to [2.31(e)(4)]:

- Anticipated signs of pain and distress
- Dosages and routes of administration
- Drugs to be used
- Frequency of administration
- Person(s) who is responsible for determining when pain-relieving drugs are needed, if appropriate
- When drugs should be administered
- When drugs should not be administered, if required for scientific reasons

**NOTICE**

A pro re nata (PRN or “as needed”) frequency of administration is not acceptable unless there are detailed instructions and criteria for determining administration of the drug.

**7.2.4.5. Survival Surgery [2.31(d)(1)(ix)]**

All survival surgery must be performed using aseptic procedures including, but not limited to:

- Aseptic technique
- Masks
- Sterile instruments
- Sterile surgical gloves

**NOTICE**

Surgery is survival if the animal regains consciousness during or after the operative procedure.

**7.2.4.6. Non-Survival Surgery**

Non-survival surgery:

- Does not require a dedicated surgical facility
- Must be performed in accordance with established veterinary medical and nursing practices

**7.2.4.7. Major Operative Procedure [2.31(d)(1)(ix)]**

Major operative procedures on regulated non-rodent animals must be performed in a dedicated surgical facility which must be operated and maintained under aseptic procedures.

A major operative procedure means any surgical intervention that penetrates and exposes a body cavity or any procedure which produces permanent impairment of physical or physiological functions.

The IACUC has the authority to determine whether specific manipulations used in research are major operative procedures. The IACUC’s determination must be based:

- On a detailed description of the procedure, and
- The anticipated or actual consequences, as characterized by the investigator

In some cases, the classification by the IACUC of a procedure as major or minor may be readjusted post-procedurally depending on clinical outcome. If the

IACUC, after thorough review, determines that the surgical procedure only penetrates but does not expose a body cavity and that the procedure does not produce substantial impairment, the IACUC may conclude that it is not a major operative procedure.

Some major operative procedures include, but are not limited to:

- Amputation
- Craniotomy
- Joint replacement
- Laparotomy

**NOTICE**

Any laparoscopic surgery that produces substantial impairment of physical or physiological function must be considered a major operative procedure. Whether the laparoscopic procedure is classified as major or minor, the IACUC must ensure that the appropriate analgesia, sterile technique, and perioperative monitoring is employed.

- Thoracotomy
- Thyroidectomy

**7.2.4.8. Non-major Operative Procedure [2.31(d)(1)(ix)]**

Non-major operative procedures on regulated animals:

- Do not require a dedicated surgical facility
- Must be performed using aseptic procedures
- Some minor operative procedures include, but are not limited to:
- Peripheral vessel cannulation
- Tooth extraction
- Wound suturing

**7.2.4.9. Rodent Surgery [2.31(d)(1)(ix)]**

Surgery on rodents:

- Does not require a dedicated surgical facility
- Must be performed using aseptic procedures

**7.2.4.10. Field Site Surgery [2.31(d)(1)(ix)].**

Surgeries conducted at field sites:

- Do not require a dedicated surgical facility

- Must be performed using aseptic procedures

#### 7.2.4.11. Multiple Survival Surgeries [2.31(d)(1)(x), see Policy #14].

An animal may not be used in more than one major operative survival procedure in one protocol unless the multiple procedures are:

- Justified, in writing, for scientific reasons, and
- Approved by the IACUC

An animal may not be used in **two separate protocols** with major operative survival procedures unless an exemption is approved by the APHIS Administrator.

The request for approval of the exemption by the APHIS Administrator should follow the guidance in Policy 14.

#### 7.2.4.12. Exceptions/Exemptions

Exceptions or exemptions to a particular AWA Regulation or Standard **approved by the IACUC must be** [2.36(b)(3)]:

- For scientific reasons
- Justified in writing

If a Regulation or Standard also provides specific parameters for an exemption/exception, those parameters must be followed.

Exceptions that **should** be reported on the Annual Report:

- Exceptions approved by the IACUC under 2.38(k) that are not provided for under the Regulations and Standards, including but not limited to:
  - 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 Part 3—Standards for species
- Exceptions approved by Animal Care, including but not limited to:
  - Approval for use of an animal in more than one major operative procedure from which it is allowed to recover on more than one protocol (2.31)(d)(1)
  - Exception to the health certificate requirement (2.38)(h)
  - Temporary tethering of dogs used as the primary enclosure (3.6)(c)(4)
- Exceptions that should **not** be reported on the Annual Report:
  - Exceptions approved by the IACUC that are provided for under the Regulations and Standards, including but not limited to

- Approval for use of an animal in more than one major operative procedure from which it is allowed to recover on one protocol (2.31)(d)(1)
- Short term withholding of food and water from animals (2.38)(f)(2)
- Exemption of an individual NHP from some or all of the environmental enhancement plan (3.81)(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 (2.31)(d)(1)(xi)
- Withholding of water from a NHP if required by the research protocol approved by the IACUC (3.83)
- Exceptions approved by a veterinarian as part of the provision of veterinary care, including but not limited to:
  - Animal is fasted for surgery conducted for husbandry reasons
  - Animal is housed in an enclosure that does not meet space requirements for medical reasons while recovering from husbandry or veterinary care related surgery
  - Animal develops vomiting/diarrhea (not study related) and veterinarian prescribes IV fluids and severely restricts food and water intake by mouth for several days

#### **7.2.4.13. Significant Changes to Animal Activities**

In support of the use of performance standards and professional judgment and to reduce regulatory burden, IACUC-reviewed and -approved policies (*e.g.*, guidance documents, standard operating procedures, drug formularies) for the conduct of animal activities may be used for the administrative handling of some significant changes as outlined below.

The following significant changes must be approved by either full Committee review or designated member review:

- From nonsurvival to survival surgery
- Resulting in greater pain, distress, or degree of invasiveness
- In housing and or use of animals in a location that is not part of the animal program overseen by the IACUC
- In species
- In study objectives
- In Principal Investigator (PI)

The following significant changes may be handled administratively according to IACUC-reviewed and -approved policies in consultation with a veterinarian authorized by the IACUC:



- Anesthesia, analgesia, sedation, or experimental substances
- Euthanasia to any method approved in the AVMA Guidelines for the Euthanasia of Animals
- Duration, frequency, type, or number of procedures performed on an animal

The following significant change that may be handled administratively according to an existing IACUC-reviewed and -approved policy without additional consultation or notification is:

- An increase in previously approved animal numbers

The following changes may be handled administratively without IACUC-approved policies, consultations, or notifications:

- Correction of typographical errors
- Correction of grammar
- Contact information updates
- Change in personnel, other than the PI. (There must be an administrative review to ensure that all such personnel are appropriately identified, adequately trained and qualified, enrolled in occupational health and safety programs, and meet other criteria as required by the IACUC.)
- Investigators may use fewer animals than approved. This does not require IACUC approval, notification, consultation, or administrative handling

## 7.3. Protocol Review Information for the Inspector

### 7.3.1. Inspection Protocol Review Guidance

Protocols and the IACUC approval and monitoring of protocols should be completely and thoroughly reviewed during an inspection.

#### 7.3.1.1. Sampling Guidance

You, the inspector, are responsible for conducting a thorough review of:

- The protocol approval process
- The IACUC's monitoring of protocol activity
- IACUC approved protocols and changes to protocols

Detailed below is guidance to assist you in evaluating the IACUC protocol review. However, you must use the Regulations and your professional judgment to determine if an IACUC or protocol is in compliance.

**NOTICE**

If a protocol has been reviewed by an AC inspector within the last year, then the VMO should use his/her professional judgment to determine if it is necessary to conduct another review. The following guidance applies to protocols which have been initially approved, or have had significant changes approved, since the last inspection.

**7.3.1.2. Prepare**

- Write down the necessary ID information for animals about which you have a concern, and
- Review the most recent annual report to identify species and numbers of animals used in columns E and D and all protocols with reported exemptions or exceptions, and
- Determine that you are aware of, and have access to, all protocols subject to AWA Regulations, including but not limited to:
  - Active protocols
  - Inactive protocols from the past 1 year, and
  - Protocols where no regulated species are currently present at the facility

**7.3.1.3. Review**

Then always review the following protocols:

- All protocols identified during inspection as of concern
- All column E protocols
- All protocols with IACUC-approved exemptions/exceptions
- Protocols cited as noncompliant and not corrected during the last inspection

**7.3.1.4. Review Additionally**

- If the facility has five or fewer remaining protocols, review all remaining protocols
- If the facility has greater than five remaining protocols, select five additional protocols to include at least one protocol from each of the following categories, if applicable:

**NOTICE**

You have already reviewed the protocols of concern so this step is meant to ensure a 'random' sample of other protocols. There may be protocols in each of these categories at a particular facility totaling more than 5. Use your professional judgment to select 5 from the other species and the high risk procedures categories and do your best to mix those up in subsequent years.

- Select one protocol for each regulated species present
- For the following high risk procedures, select one from each of the categories below, if applicable:
  - Potentially painful/distressful procedures (Column D)
  - Antibody production
  - Food/water restriction
  - Neuromuscular blockers
  - Surgical procedures
  - Teaching or trauma training protocols
  - Toxicity studies
  - Infectious disease studies
  - Vaccine potency/efficacy studies

**7.3.1.5. Research Facility Protocol Selection Worksheet**

You must complete the Protocol Selection Worksheet when you are reviewing protocols. See [Research Facility Protocol Selection Worksheet](#).

Instructions for completing the Protocol Selection Worksheet are as follows:

- A protocol should only be counted once, even if it falls into more than one selection criteria
- **All Column E protocols** should be counted in the Column E row (Row #2) even if they also fit into another selection criteria
- **For all other protocols**, use your professional judgment for deciding which selection criteria is most appropriate for a protocol to be counted in
- Total Protocols Selected and Reviewed should equal the sum of Rows 1- 5

After completing the worksheet, you should:

- Submit the Worksheet (with the facility's Inspection Report) which will be scanned into ACIS at the RO
- Keep a copy for your records
- Leave a copy with the research facility if requested by the facility

**NOTICE**

If you think that following these requirements will result in the expenditure of an inordinate amount of time, seek guidance from your SACS.

**7.3.1.6. Verification of IACUC Activities**

Ways to verify IACUC activities include, but are not limited to:

- Audio meeting minutes
- Compliance Office/Officer activities, if the facility has a Compliance Office
- Correspondence
- Email correspondence and email records
- Interviews with IACUC members
- Memos/notes
- Protocols
- Protocol submission forms
- Written meeting minutes

**7.3.1.7. Protocol Approval Process**

You, the inspector, should conduct a thorough review of the IACUC's protocol approval process to ensure that the IACUC is following the Regulations and procedures as outlined in the "IACUC Protocol Review" subsection.

**7.3.1.8. Specific Types of Protocols****7.3.1.8.1 Painful/Distressful Procedures (see Policy #12)**

When reviewing protocols involving procedures that may cause more than momentary or slight pain/distress/discomfort (protocols in Categories D and E), some areas to pay special attention to include, but are not limited to:

- The principal investigator has considered alternatives to the painful/distressful procedure
- There is a detailed narrative describing the methods and sources used to determine that no alternatives to the painful/distressful procedure are available
- Measures used to alleviate the pain/distress are clearly stated and adequate, including:
  - Drugs, dosages, routes, and frequency of administration
  - Other methods, including but not limited to:
    - Acupuncture

- Hydrotherapy
- Hot/cold packs
  - o A pro re nata (PRN or “as needed”) frequency of administration is **not** acceptable unless there are detailed instructions and criteria for determining administration of the drug
- Availability of experienced personnel, especially at night and on weekends and holidays, to assess and administer pain relief
- If pain/distress relief is not to be used, there is an adequate justification and endpoints are described that will be used to terminate the study and/ or used as the basis for when treatment or euthanasia will be performed
- The principal investigator has consulted and involved the attending veterinarian or his/her designee in the planning of the procedure and pain/ distress relief
- There is not the use of paralytics without anesthesia
- Animals experiencing severe or chronic pain/distress that cannot be relieved will be humanely euthanized
- The endpoint has been determined and identified

#### NOTICE

If the research facility has written, IACUC-approved standard operating procedure(s) (SOPs) for such things as (but not limited to) surgical procedures, pain/distress relief, antibody production, routine veterinary care, housing, euthanasia, etc., and those specific procedures are not specifically described in a PI’s submitted protocol, the PI’s protocol must reference and follow the applicable SOP(s).

#### 7.3.1.8.2 Antibody Production Protocols

When reviewing protocols involving antibody production, some areas to pay special attention to include, but are not limited to:

- The principal investigator has considered alternatives for painful/ distressful procedures
- An alternative search, if done, was properly conducted and reviewed for possible alternative procedures and a rationale provided as to why available alternatives cannot be used
- The justification for the number of animals to be used was appropriate, such as the amount of antibody needed and the amount which can be produced by an animal
- There is a complete description of the procedure to induce antibody production and the collection of blood/serum
- If adjuvants likely to cause more than momentary pain/distress, such as

Freund's Complete, are being used, there is at a minimum:

- Justification for its use
- A listing of possible adverse reactions
- Adequate care of the animal if adverse reactions occur

#### 7.3.1.8.3 Food and/or Water Deprivation or Restriction

When reviewing protocols involving food and/or water deprivation or restriction, some areas to pay special attention to include, but are not limited to:

- The food/water deprivation or restriction is adequately justified
- If the animals are likely to experience distress, the principal investigator has considered alternatives to the distressful procedures
- A search for alternatives, if done, was properly conducted and reviewed for possible alternatives to procedures that may cause more than momentary pain or distress
- Procedures used to restrict food/water are adequately described and easily understood
- Procedures for selection of animals and training and monitoring the animals are described in detail
- Baseline physiological data is being collected
- Physiological parameters are being monitored during the study, such as:
  - Body weight
  - Hydration status
  - Behavioral changes
  - Plasma osmolality
- Medical/research records are being maintained and contain information on the monitoring of the animals, if required by the protocol, Program of Veterinary Care, or Institutional policy
- Supportive care is provided to any animal suffering dehydration or stress
- If supportive care is not provided, there is an appropriate scientific justification for not doing so
- How the animals' daily food and water intake was determined
- The protocol addresses how the animal is to receive its required daily food or water intake, such as:
  - During its working sessions
  - Supplementation to the amount consumed during working sessions
  - Whether small amounts of food or water provided as rewards are, or are not considered part of the animals' daily food or water requirement

- If the animal is not to receive its daily food and water requirement, procedures and parameters for monitoring the animal are detailed in the protocol
- The endpoint has been determined and identified

#### 7.3.1.8.4 Neuromuscular Blockers

When reviewing protocols involving the use of neuromuscular blockers (NMB), some areas to pay special attention to include, but are not limited to:

- The use of the NMB is appropriate
- The use of the NMB is adequately described in the protocol including, but not limited to:
  - Name of NMB
  - Dosage
  - Timing of administration
  - Method of anesthesia
- The NMB is being used with general anesthesia
- All personnel working with the animal and NMB are properly trained in its use and possible adverse reactions
- The animal is being properly monitored, such as:
  - Heart rate and blood pressure
  - Level of anesthesia

#### NOTICE

Pain withdrawal response is not an appropriate measure of level of anesthesia as this response would be prevented by the NMB. The use of a peripheral nerve stimulator is strongly recommended as part of the monitoring procedure when NMB's are being used on an animal.

- Appropriate supportive care, such as ventilatory support, is being provided during anesthesia
- Surgical and anesthesia records are being kept and contain the appropriate information
- Recovery procedures are appropriate, *i.e.*:
  - The animals are reversed from the NMB when reversal agents are available before being allowed to recover from the anesthesia
  - Recovery is being monitored

#### 7.3.1.8.5 Surgical Procedures

When reviewing protocols involving surgical procedures, some areas to pay

special attention to include, but are not limited to:

- The pre-procedural care and surgical preparation of the animals are clearly stated, drugs given prior to and during the procedures, such as analgesics, tranquilizers, and anesthetics, are appropriate and at the correct dosage for the species
- The surgical procedure is stated clearly and in detail
- All survival surgeries are performed using aseptic technique
- Major operative survival surgeries on non-rodents are performed in a dedicated surgical facility
- No animal is being used in more than one major operative survival surgery unless appropriately approved
- Post-surgical procedures are stated clearly and in detail, such as:
  - Observation and monitoring of recovery
  - Any special recovery environment requirements
- Pain/discomfort relief measures are stated clearly and in detail including, but not limited to:
  - When drugs are to be administered
  - Drug, dose, route, and frequency of administration
  - Signs of pain/distress
  - Contact person(s)
  - Other or additional methods of pain/distress relief

#### 7.3.1.8.6 Teaching Protocols

When reviewing teaching protocols, some areas to pay special attention to include, but are not limited to:

- The rationale for the number of animals to be used was appropriate, such as the number of students per animal and procedures needed to be learned
- A consideration of alternatives for procedures that might cause more than momentary pain or distress was properly conducted and reviewed for possible alternative procedures, such as the use of:
  - Veterinary mannequins
  - Live tissue alternatives
  - Mechanical teaching devices
- There is a complete description of the procedures to be used
- The number of procedures to be performed on each animal is clearly stated, such as injections per animal
- The personnel doing the teaching are qualified and properly trained



- If the teaching procedures cause more than momentary or slight pain or distress, proper methods are used to alleviate the pain/distress

#### 7.3.1.8.7 Toxicity and Vaccine Potency/Efficacy Studies

When reviewing protocols involving toxicity and vaccine potency/efficacy studies, some areas to pay special attention to include, but are not limited to:

- A consideration of alternatives (reduction, replacement, or refinement) for procedures that might cause more than momentary pain or distress was properly conducted and reviewed for possible alternative procedures, such as, but not limited to:
  - Revised up-and-down procedure (UDP) as a refinement to LD50 studies (refinement, reduction)
  - Use of cell cultures and tissue assays, such as for dermal and ocular safety testing
  - Use of sequential testing and fewer animals to identify dermal and ocular chemical hazards (reduction)

#### NOTICE

The [Interagency Coordinating Committee on the Validation of Alternative Methods](#) provides a list of some alternative tests.

- The rationale for the number of animals to be used was appropriate
- If the number of animals required is set by a government agency, the specific Regulation or guideline is cited in the protocol
- Appropriate methods are being used to relieve any pain or distress, unless scientifically justified
- Animal technicians and caretakers are properly trained in identifying problems and procedures to follow
- Humane end points for when the study can be terminated or that can be used as the basis for euthanasia or treatment have been determined and identified

#### NOTICE

Non-farm animals, such as hamsters, Guinea pigs, and rabbits, used to develop and test vaccines for farm animals are covered under the AWA.

#### 7.3.1.9. Inspection Procedures

Listed below are some additional aids to assist you in determining if the procedures outlined in the protocols are being followed.

**NOTICE**

Animals may be held, but cannot be used without being on a protocol.

- Ask how the research facility keeps track of the number of animals approved by the IACUC and the number of animals used by the principal investigator, such as:
  - Computer records
  - Acquisition and disposition records
  - Dead animal records
  - Inventory cards
- Ask how the facility checks the accuracy of its methods for tracking the number of animals
- Ask for exemption/exceptions to the Regulations or Standards, then check the protocol to determine that the exemption/exception was approved
- Determine if the animal care staff is familiar with the protocol procedures, especially pre- and post-painful/distressful procedure care, such as:
  - Asking the staff
  - Checking the availability of protocols
  - Checking the availability of standard operating procedures
  - Looking in medical records
- Watch the animal care staff, principal investigators, or laboratory personnel handle the animals (or ask them to handle the animals, if appropriate)
- Review medical records/investigator's logs to determine that animals with painful/distressful procedures received the proper pain/distress relieving drugs, if applicable
- Observe animals for signs of unrelieved pain
- Ask about weekend staffing, animal observation, and medical care
- Determine if the medical or emergency contact numbers are current and readily available, such as:
  - On bulletin boards
  - In the animal rooms
  - In medical records/charts
  - In protocols
- Observe surgeries to determine that they are being conducted using aseptic technique and in dedicated surgical facilities, if required

- Ask how the research facility tracks animals to ensure that they are not used for another survival surgery (unless approved by the IACUC or APHIS), such as:
  - Health records
  - Individual animal records
  - Cage cards
  - Surgery records
  - Investigator’s logs
- For APHIS-approved multiple major survival surgeries, verify that the stipulations in the approval letter are being met

**Table 7-1 Species-Typical Signs of Pain**

Species	Possible Signs of Pain <sup>1, 2</sup>
Dogs	Quiet, unwilling to move, abnormal posture, lack of alertness, whimpering, groaning, howling, shivering, loss of appetite, increased respiration, growl or exhibit apprehension when approached
Cats	Ungroomed appearance, quiet, apprehensive facial expression, loss of appetite, crying, hissing, hiding, crouching or hunching
Guinea Pigs	Quiet, decreased food and water consumption, anorexia
Hamsters and Gerbils	Decreased activity, piloerection, ungroomed appearance
Rabbits	Inactivity, appear apprehensive or anxious, hunched appearance, hide, squeal or cry, possible aggressive behavior with excessive scratching and licking
Nonhuman Primates	Stops eating and/or drinking, stops grooming
Cattle	Dull, depressed appearance, heads bowed, lack of alertness, loss of appetite, rapid/ shallow breathing, rigid posture
Sheep and Goats	Similar to cattle, also vocalization, teeth grinding, increased lip curling
Pigs	Changes in overall demeanor, social behavior, gait and posture, unwilling to move, hiding, excessive squealing when handled

1 Excerpted from: National Research Council: *Recognition and Alleviation of Pain in Laboratory Animals*, Washington, D.C., National Academy Press, 2009.

2 These are possible signs of pain and do **not** necessarily mean the animal is in pain. A lack of these signs also does **not** mean that the animal is **not** in pain.

## 7.4. Protocol Review Information for the Registered Research Facility

### 7.4.1. Procedure for Protocol Review

The IACUC is responsible for the review and approval of all proposed activities

related to the care and use of animals [2.31].

#### 7.4.1.1. Procedure

A written protocol, *i.e.*, a proposal for animals use activities, must be submitted to and approved by the IACUC prior to the start of any animal use activity. [2.31(d)]

The IACUC must review all submitted protocols and decide to [2.31(c)(6)]:

- Approve the protocol, or
- Require modifications in the protocol to secure approval, or
- Withhold approval of the protocol

The IACUC review must be conducted by [2.31(d)(2)]:

- Full Committee review, or
- A subcommittee of at least one member of the IACUC designated by the IACUC chair who:
  - Is qualified to conduct the review, and
  - Has the authority to:
    - Approve
    - Require modifications in the protocol to secure approval, or
    - Request a full IACUC review of the protocol

#### NOTICE

This person or subcommittee might be referred to as the Designated Reviewer(s) or Designated Member(s).

Prior to IACUC review, each member of the IACUC must be provided the following [2.31(d)(2)]:

- A list from the IACUC chair or his/her designee of the protocols to be reviewed
- A copy of any protocol, upon request

#### NOTICE

Any member of the IACUC may request, and must be granted, a full Committee review of a protocol. [2.31(d)(2)]

No member of the IACUC or subcommittee may grant approval of a protocol until the entire IACUC has been informed that the protocol is to be reviewed, and members are given the opportunity to read the protocol.

If an IACUC member has a conflicting interest with a protocol being reviewed,

e.g., is personally involved, that member may not [2.31(d)(2)]:

- Contribute to the constitution of a quorum
- Participate in the review or approval of the protocol

#### NOTICE

The member may provide information about the activity proposed in the protocol.

#### 7.4.1.2. Full Committee Review

If a protocol is reviewed by the full committee [2.31(d)(2)]:

- The review must be conducted at a convened meeting with a quorum of the IACUC, and
- Approval must be by a majority vote of the quorum

#### 7.4.1.3. Subcommittee Review (Designated Reviewer)

The Designated Reviewer(s) has the authority to:

- Approve a protocol
- Approve a significant change(s) to a protocol
- Require modifications to a protocol/significant changes
- Request a full IACUC review

A protocol or significant change approved by the Designated Reviewer does not need to be reviewed and approved by the full IACUC.

#### NOTICE

Only after all members of the IACUC have decided that a full committee review of a protocol is not necessary, can the protocol be reviewed by the Designated Reviewer.

#### 7.4.1.4. Consultants

The IACUC may confer with a consultant(s) or the principal investigator(s) to aid in understanding complex areas of a protocol [2.31(d)(3)].

Unless the consultant is a member of the IACUC, he/she must not [2.31(d)(3)]:

- Approve or withhold approval of a protocol
- Vote with the IACUC

#### **7.4.1.5. Notification**

The IACUC must notify the principal investigator(s) and the appropriate person(s) at the research facility (usually the Institutional Official or his/her designee) in writing of its decision regarding the approval of the protocol [2.31(d)(4)].

If the IACUC decides to withhold approval or require modifications in the protocol, it must [2.31(d)(4)]:

- Include in its written notification the reason for the decision
- Give the principal investigator(s) an opportunity to respond in person, or in writing

The IACUC may reconsider its decision to withhold approval if the principal investigator corrects the deficiencies in the protocol to the satisfaction of the IACUC. Any change in the IACUC's decision must be documented in the minutes [2.31(d)(4)].

#### **7.4.1.6. Continuing Review**

The IACUC must review all active protocols at least once a year, *i.e.*, within the same month or earlier than the date of the initial approval, or more often, at the discretion of the IACUC [2.31(d)(4) & (5)].

- The review may be conducted by the IACUC or a subcommittee
- All IACUC members are informed of the annual reviews
- All members are given the opportunity to participate in the annual reviews
- The IACUC reviews and decisions are documented in writing and available for inspection

The review should consider:

- New activities
- Changes in the number and type of animal
- New exceptions to the AWA Regulation and Standards

#### **7.4.1.7. Changes in Protocols**

Changes in protocols may be handled either by full Committee review or designated member review, or by an administrative process as detailed in the "Significant Changes to Animal Activities" subsection.

### **7.4.2. Suspension of a Protocol Activity**

The IACUC may suspend a previously-approved protocol activity [2.31].

#### **7.4.2.1. Criteria**

The IACUC may suspend an activity that it previously approved if it determines

that the activity is not being conducted as [2.31(d)(6)]:

- Described by the principal investigator, and
- Approved by the IACUC

The IACUC may suspend an activity only [2.31(d)(6)]:

- After review of the matter at a convened meeting of a quorum of the IACUC, and
- With a vote for suspension by a majority of the quorum

If the IACUC suspends an activity involving animals, the IO, in consultation with the IACUC, must [2.31(d)(7)]:

- Review the reasons for the suspension
- Take appropriate corrective action
- Report that action with a full explanation to the appropriate Animal Welfare Operations Office, and any Federal agency funding that activity

## 7.5. Contracted Research or Projects that Involve Multiple Registrants

When registered Research Facilities (RF) contract research out to be conducted at another facility, it is the responsibility of the registrants to determine and document which party is responsible for the functions of the IACUC, animal care and handling, and reporting of the animals on the Annual Report.

### 7.5.1. No Documentation of Responsibilities

If there is no documentation of specific areas of responsibility, then:

- Both registered parties are responsible, and
- Both IACUCs should perform all required functions, and
- Only one of the RFs should report the animals on the Annual Report
- You, the inspector, should cite both RFs for any noncompliances identified

### 7.5.2. Specific Responsibilities

If the contract designates specific responsibilities to each partner, the facility is a site of both registrants.

You, the inspector, should inspect only the designated institution for the specific responsibility agreed upon in the contract.

For example:

- RF A is designated to perform the semiannual program review and facility inspection, while both RF A and RF B are designated to review the protocol, then:

- Both RF A and RF B are responsible for the protocol and both IACUC's must approve the protocol, but
- Only RF A is responsible for the semiannual review
- You, the inspector, inspect:
  - The protocol review and approval at both RF A and RF B, and
  - The semiannual review only at RF A
- The contract specifies that both RF A and RF B are responsible for the IACUC functions, but only RF B is responsible for the animal care and handling, and reporting on the Annual Report, then:
  - You, the inspector, inspect:
    - The IACUC functions at RF A, and
    - The IACUC functions, animal care and handling, and the AR reporting of the animals under the contract at RF B

### **7.5.3. All Responsibilities Designated**

- If RF A contracts the entire project and all responsibilities to RF B, then:
  - The location of RF B is not a site of RF A
  - RF A does not have any responsibility for the IACUC functions, animal care and handling or Annual Reporting
  - You, the inspector, inspect only RF B for the IACUC functions, animal care and handling, and Annual Reporting.

Individual researchers or staff frequently partner with multiple institutions. The IACUC reviewing the protocol must assure that all personnel have appropriate training and qualifications. [2.32(a)] But this does not confer any responsibility on the other RFs with which that particular individual is associated.

## **7.6. Records**

The research facility must maintain records of the IACUC's activities [2.35].

### **7.6.1. Required Research Facility Records**

#### **7.6.1.1. IACUC Records**

A research facility must have the following records, if applicable, for review during inspection [2.35]:

- Minutes of the IACUC meetings, including:
  - A list of members who were and were not present
  - All the activities conducted by the IACUC at the meeting



- Any dissenting opinions
- Approval of the minutes (usually of the previous meeting) by the IACUC (recommended, not required)
- Substance of the deliberations of the IACUC, not just the decisions made
- Program of humane care and use
- Investigation of concerns
- Recommendations to the IO
- Records relating to animal activities, including:
  - Annual review of protocols
  - IACUC decisions on protocols and proposed changes
  - Notification of Principal Investigator of decisions on protocols and proposed changes
  - Notifications of suspension of protocol
  - Proposed significant changes to protocols
  - Protocols
- Semi-annual reports, including:
  - Review of humane care and use program
  - Facility inspection
  - Report of program and facility reviews to the Institutional Official, including minority views
  - IACUC-identified significant deficiencies
- Verification of appointment of IACUC members by the Chief Executive Officer (CEO) or Institutional Official (IO)

#### **7.6.1.2. Personnel Qualifications and Training**

The research facility must adequately document the qualifications and training of personnel which may include, but not be limited to:

- Certificates of attendance at formal meetings
- Certificates of completion from relevant continuing education programs
- Curriculum vitae/resumes
- Diplomas or certificates from educational institutions
- Sign-up sheets from in-house training programs

#### **7.6.2. Animal Records**

A research facility must have the following records, if applicable, available for

review during an inspection;

- Acclimation statements for transportation
- Acquisition and disposition records for dogs and cats [2.35(b) and (c)]
- Approved water and power emergency plans for marine mammals [3.101(b)]
- Attending veterinarian approved exemptions to the Regulations or Standards, usually part of an animal's medical records
- Record of animals on hand for dogs and cats. (Use of APHIS Form 7005 is not required.) [2.35(b)]
- Certification for acquired random source dogs and cats [2.35(b)(8)]
- Certification for exempt sources of dogs and cats [2.35(b)(8)]
- Documentation for all other covered animals showing that current medical problems and existing chronic conditions are:
  - being addressed, and/or
  - receiving proper veterinary care

#### NOTICE

Lack of this documentation may not be cited as a stand-alone noncompliance, but must be related to the Regulations and the condition of the animal.

- Documentation of training of attendants or employees working with marine mammals
- Environmental enhancement plan for nonhuman primates
- Exercise plan for dogs
- Health certificates for dogs, cats, and nonhuman primates when transported across State lines
- Medical records for marine mammals
- Necropsy records for marine mammals
- Program of veterinary care, if using part-time or consulting attending veterinarian
- Water quality records for marine mammals

### 7.6.3. Annual Report

Both you and the RF should have a copy of the Annual Report.

You, the inspector, should verify that the RF's Annual Report is accurate, that is:

- All animal facilities are reported
- Only regulated species are reported

- Animals are reported in the correct column
- IACUC-approved exceptions not provided for in Animal Welfare Act Regulations and Standards are reported
- IACUC-approved exemptions provided for in the AWA Regulations and Standards are not reported
- The number of animals reported is correct
- There are appropriate explanations for all Column E animals

You, the inspector, should verify that the RF's Annual Report does not report any animals used for the following:

- Field studies which meet the following criteria and are therefore exempt from the Regulations and do not require a written, approved exemption. The study does not [1.1, 2.31(d)(1)]:
  - Harm the animals under study
  - Involve an invasive procedure
  - Materially alter the behavior of the animals under study
- Animals euthanized, killed, or trapped, and collected, such as for study or museum samples, from their natural habitat via humane euthanasia
- Agricultural research
- Food or fiber
- Wildlife management projects

#### NOTICE

The facility's IACUC should be involved in the above use of animals in order to review the activity that is taking place and to ensure that the method of euthanasia is humane and appropriate, if applicable.

Methods of verifying the animal numbers include, but are not limited to:

- Asking the research facility representative to demonstrate how the number of animals was determined for:
  - A particular species, or
  - A column from the annual report
- Asking for verification of animals used by site to obtain the total number of animals used, for example:
  - Review a particular species used by site, or
  - Review a column from the annual report by site
- Counting the animals, if appropriate or feasible
- Review of:

- Acquisition records
- Animal ordering information, such as invoices or computer animal tracking systems
- Animals ordered in comparison to number of animals approved for a particular protocol
- Facility animal census records
- Internal billing records to PIs for animal housing/care
- Protocol medical or animal-usage records

Animals reported in Column B of APHIS Form 7023-Annual Report, should be those animals being bred, conditioned, or held for use in teaching, experiments, research, or surgery, but not yet used for such purposes.

All animals contained on the facility's inventory on September 30 of the reporting year that were not used in a research project that year should be reported in Column B as being held for research purposes. Animals that were held but died during the year without being used for research purposes should also be reported in this column. Other animals held during the reporting year but not present at the facility on September 30 should not be reported in this column. They should be reported by the facility which possesses them on September 30.

If a research facility is licensed as a dealer:

- Breeding animals and any offspring intended for research purposes within the research facility should be reported in Column B
- Animals intended for sale only should not be reported in Column B but should be included on the dealer license renewal
- If the research facility is unsure of the status of an animal (research or sale only), the animal should be reported in Column B

Animals actually used for research purposes during the reporting year must be reported in Column C, D, or E, as appropriate. [2.36(b)(5-7)]

#### NOTICE

If methods other than anesthetics, analgesics, or tranquilizing drugs are used to relieve pain or distress, animals can still be reported in Column D if the methods are appropriate and effective.

**NOTICE**

The use of anesthesia does not always mean that the animal should be reported in Column D. If the animal was anesthetized for a non-invasive procedure, a blood draw, or other veterinary care procedure, the animal could be reported in Column C. The RF should determine the appropriate reporting column.

If an animal was moved to another RF during the reporting year, the animal should only be reported once by either:

- The RF with the highest pain category for the animal, or
- If the pain categories are the same, then by the last RF to possess the animal

Refer to the following documents for additional information about the annual report:

- [APHIS Form 7023—Annual Report of Research Facility](#)
- [Instructions for Completion of APHIS Form 7023](#)

**7.6.4. Retention**

All records and required reports must be maintained [2.35(f)]:

- At least 3 years, or
- Longer if:
  - Necessary to comply with any applicable Federal, State, or local law
  - The APHIS Administrator notifies the research facility, in writing, that specified records must be retained pending completion of an investigation or proceeding and held until their disposition is authorized

Records must be held for at least 3 years from the date of completion of the IACUC-approved protocol [2.35(f)].

**7.6.5. Availability**

Records must be available for inspection and copying by [2.35(f), 2.38(a), 2.38(b)(1)(ii) and (iii)]:

- Any APHIS official
- Any funding Federal agency representative

**7.6.6. Confidentiality and Removal of Records**

APHIS inspectors **must** [2.35(f)]:

- Maintain the confidentiality of the information
- Not remove the records from the research facility's premises unless:

- There has been an alleged violation
- The records are needed to investigate a possible violation
- The records are needed for other enforcement actions

#### NOTICE

Release of any materials removed from the facility that contain trade secrets, or commercial or financial information that is privileged or confidential, will be governed by applicable sections of the Freedom of Information Act.

You, the inspector, should follow the guidelines below when removing records from a research facility:

- Only take photos or copies of records off-site if needed to support a Direct, Critical or Repeat citation, or when there is a disagreement between you and the research facility over an NCI and the research facility has indicated that it is likely to appeal the citation. Do NOT remove original records.
- Make copies or scan records, instead of photographing, if possible
- Be sure the research facility knows what records were copied, scanned, and/or photographed before leaving the facility
- Give the research facility the opportunity to redact names, locations, and other PII before taking photos, scanning, or making copies of the record. You should allow the facility 24 to 48 hours for this redaction.
- Provide the research facility the opportunity to view your photos, if requested. If possible, delete or retake any photos that the facility states may contain potential PII, or confidential or proprietary information to remove or block the sensitive information. If the noncompliance cannot be documented without the inclusion of potentially confidential or proprietary information, ensure that the photograph label states: “May contain confidential or proprietary information.”

SACS may have inspectors take additional photographs, in addition to the required photos listed above.

## 7.7. Electronic Communication

Some forms of electronic communication systems may be used to conduct IACUC functions.

### 7.7.1. IACUC Meetings

The IACUC meetings should allow members to be in direct communication to consider, deliberate, and vote on areas of their responsibility. This is traditionally done by face-to-face meetings.

The IACUC may conduct its activities using electronic communication systems which allow all members to be in direct communication, if all of the following criteria are met:

- All members are given notice of the meeting
- Documents normally provided to members during a physically-convened meeting are provided to all members in advance of the meeting
- All members have access to the documents and the technology necessary to fully participate
- A quorum of Committee members is convened when required
- The communication system allows for real time verbal interaction equivalent to that occurring in a physically-convened meeting (*i.e.*, members can actively and equally participate and there is simultaneous communication)
- If a vote is called for, the vote occurs during the meeting and is taken in a manner that ensures an accurate count of the vote

#### NOTICE

A mail ballot or individual phone polling cannot substitute for a convened meeting.

- Opinions of absent members that are transmitted by mail, telephone, fax, or email may be considered by the convened IACUC members, but may not be counted as votes or considered as part of the quorum
- Written minutes of the meeting are maintained as required by the AWA Regulations

All activities conducted via electronic communication must be documented in writing and original or electronic signatures obtained, when required.

Examples of electronic communication systems include, but are not limited to:

- Audio-visual conferencing, including webinar-based forums
- Conference calls

Fax, email, and one-on-one communication via telephone are not acceptable methods for conducting IACUC functions which require a convened meeting, such as:

- Full committee review
- Suspension of an approved activity

The use of email or one-on-one communication via telephone for these activities is citable under 2.31(d)(2), 2.31(c)(3), or 2.31(d)(6).

## 7.8. Guidance for Veterinary Schools and Veterinary Technician Programs (VTP) for the Inspector

### 7.8.1. Teaching versus Research

The definition of activity in Part 1 of the AWA means, those elements of research, testing, or teaching procedures that involve the care and use of animals.

For the purposes of the AWA, teaching is equivalent to research. Using farm animals for teaching agricultural students is not regulated, while using farm animals for teaching veterinary/vet tech students is regulated.

### 7.8.2. Registration Requirements

#### 7.8.2.1. Always Registered

A registration is needed if live covered animals utilized for teaching purposes are owned by the facility.

- EXAMPLE**
- Facility purchases or obtains donated animals from any source
  - Facility uses animals that do not fall under a veterinary client patient relationship (VCPR)

A VCPR as defined by the AVMA is present when all of the following requirements are met:

- The veterinarian has assumed the responsibility for making clinical judgments regarding the health of the patient and the client has agreed to follow the veterinarians' instructions
- The veterinarian has sufficient knowledge of the patient to initiate at least a general or preliminary diagnosis of the medical condition of the patient

This means that the veterinarian is personally acquainted with the keeping and care of the patient by virtue of a timely examination of the patient by the veterinarian or medically appropriate and timely visits by the veterinarian to the operation where the patient is managed.

- The veterinarian is readily available for follow-up evaluation or has arranged for the following: veterinary emergency coverage, and continuing care and treatment
- The veterinarian provides oversight of treatment, compliance, and outcome
- Patient records are maintained



**NOTICE**

If a registered VTP is conducting non-regulated activity at a clinic, shelter, or farm, these locations should not be added as sites of the VTP.

**7.8.3. Usually Not Registered**

A registration may not be needed if the facility does not own any of the regulated animals utilized for teaching and all animals used are either:

- Patients (which could include work performed for a shelter), or
- Pets whose owners are always present. This would include animals at clinics, shelters or farms where a staff person is onsite and available to observe the activities.

**7.8.4. Special Circumstances That May Require Registration**

These and other special circumstances must be evaluated with the SACS on a case-by-case basis.

- A “pet”, including animals belonging to a student, staff or faculty, is housed at the facility and used in different teaching situations without the owner being present
- Animals not owned by the facility are housed at the facility for an extended period of time

**7.8.5. AVMA Accreditation**

The AVMA does not require that a VTP be registered with the USDA.

The AVMA does require that the VTP apply AWA guidelines to all animal use. All animal activities conducted by a program must be approved by an animal care and use committee whose structure and function are in accordance with AWA requirements.

**7.8.6. Licensing Requirements for Providing Animals to VTP****7.8.6.1. No License Required**

The following sources of animals do not require a license:

- Persons donating animals to the vet tech program
- Exempt persons who have certified that the dogs and/or cats being sold were born and raised on the persons’ premises and that they have sold fewer than 25 dogs and/or cats that year for research
- Municipal pounds or shelters

### 7.8.6.2. Dealer's License Required

The following sources of animals require a license:

- Private shelters, unlike municipal and contract pounds, are not exempt from the licensing requirements if animals are being sold (as opposed to being donated). Rescue groups fall into the category of private shelters.
- Dealers who breed and raise regulated animals for covered activities

### 7.8.7. Inspection Procedures

You (the inspector) should only inspect the animals and animal facilities for animals owned by the facility.

Do not inspect animals or housing areas for animals owned by other entities such as vet clinics, hospitals, shelters, or animals that fall under a veterinary client patient relationship.

For Veterinary School Spay/Neuter Programs, IACUC oversight is not required if the Veterinary School has a written agreement with a pound/shelter, which is acting as the owner of the animals, soliciting the service of the Veterinary School to perform spaying/neutering. The service is considered to be rendered under a valid Veterinary-Client-Patient relationship.

If the facility asks you to inspect or look at non-regulated animals or facilities, you may go through these areas with the facility representative but do not document any findings on an Inspection Report. Consult your SACS if further guidance is necessary.

#### 7.8.7.1. Records Requirements

For regulated animals used in regulated teaching activities, the records requirements are the same as for any other research facility.

The following records must be available for review during the inspection, if applicable:

- Acquisition/disposition records must be kept for any dogs or cats acquired by the facility that do not fall under a veterinary client patient relationship. The use of APHIS Forms 7005 and 7006 are **not** required but may be used by the facility to keep and maintain the required information. [2.35(b)]
- Annual Reports [2.36(a)]

Acquisition/disposition records are not required for:

- Dogs/cats used in the context of a veterinary client patient relationship, however the ownership of these animals should be clear in other facility records maintained as part of the veterinary client patient relationship
- All regulated animals other than dogs and cats

All regulated species of animals used for regulated purposes must be included on

the annual report. [2.36(b)(5-8)]

The following animals should not be included on the annual report:

- Client, staff, or student-owned animals utilized in the presence of the owner
- Animals utilized for teaching purposes at working farms, ranches, veterinary hospitals or shelters if used in the context of a veterinary client patient relationship
- Animals used in the context of a veterinary-client-patient relationship

Records must be held for at least three years (beyond the final disposition of the animal) [2.35(f)].

### **7.8.7.2. Identification Requirements**

For regulated animals used in regulated teaching activities, the animal identification requirements are the same as for any other research facility.

Research facilities are only required to individually identify dogs and cats. [2.38(g)].

There are no individual identification requirements for other regulated species.

### **7.8.7.3. Protocols**

For protocols involving regulated animals used in regulated teaching activities, protocol and IACUC oversight requirements are the same as for any other research facility.

For animals that are not regulated by the AWA (*i.e.* pets or patients) no protocols or IACUC oversight is required.

### **7.8.8. Special Considerations**

Contact your SACS if any of these circumstances come to your attention via inspection or another method:

- Complaints are received regarding the welfare of the animals
- Inspector becomes aware of animal injury or death as the result of non-regulated teaching procedures
- The owner of an animal expresses concern about its care or use
- It is unclear if a veterinary client patient relationship actually exists

## **7.9. Inactive Research Facility or Research Facility with No Activity for Two Years Inspection**

### **7.9.1. Inactive Research Facility**

A research facility may request to be placed in an inactive status if the research

facility has:

- Made a written request to the Animal Welfare Operations Director, and
- Not used, handled, or transported regulated animals for a period of at least two years

An inactive research facility must [2.30(c)(2)]:

- File an annual report of its status
- Notify the Animal Welfare Operations Director, in writing, at least ten days prior to using, handling, or transporting regulated animals again

## **7.9.2. Research Facilities with No Regulated Activity for Two Years**

Inspect an active research facility which has not conducted any regulated activity for at least two years the same as an inactive research facility even though the research facility has not requested inactive status.

### **7.9.2.1. Inspection Frequency**

Inactive research facilities and research facilities with no activity for two years are inspected at least annually.

Contact your SACS if you are unable to inspect a facility during the required period.

### **7.9.2.2. Inspection Procedures**

You, the inspector, should inspect records and facilities to confirm that the research facility has not used, handled or transported any regulated species and has not conducted any regulated activity since your last inspection, then:

- Document on the Inspection Report, “No regulated activities.”
- Encourage the research facility to cancel its registration
- Ensure that the research facility has an IACUC in place and has filed an Annual Report

If there are covered species present, but they are not being used for a covered activity at the time of your inspection:

- Document on the Inspection Report, “No regulated activities.”
- Ensure that the research facility has an IACUC in place and has filed an Annual Report
- Ascertain that the IACUC has reviewed the use of the covered species and determined that the use of the animals is exempt from coverage

Examples of covered animals being used for non-covered activity include, but are not limited to:

- Agricultural animals used for developing antibodies for agricultural animals

- Breeding trials in sheep
- Pigs on food conversion studies for pig feed

**NOTICE**

Remind the inactive research facility that it must notify the Animal Welfare Operations Director, in writing, at least 10 days prior to using, handling, or transporting regulated animals again. [2.30(c)(2)]

**7.10. Holding Period**

Research facilities that acquire dogs or cats from sources other than dealers, exhibitors, and exempt sources must hold the animals for a full 5 days after acquiring the animals, not including the day of acquisition and time in transit, before the facility may use the animals. [2.38(j)] For more holding periods, see Holding Period Summary Chart in Appendix A.

**Table 7-2. Holding Period Summary Chart**

Regulation	Applies To	Holding Period	Species	Comments
2.38(j)	Research Facilities acquiring dogs and cats from sources OTHER than licensees and exempt* persons	5 full days (not including day of acquisition and time in transit)	Applies to live dogs and cats	The hold is performed by the research facility The hold only applies when the vet tech program permanently obtains the animals
2.101 (a)**	Dealers/Exhibitors	5 days (not including day of acquisition and time in transit)	Applies to live dogs and cats	The hold is performed by the licensee acquiring the animal
2.101 (a)1**	Dealers/Exhibitors who acquire from a private or contract pound/shelter	10 days (not including day of acquisition and time in transit)	Applies to live dogs and cats	The hold is performed by the licensee acquiring the animal
2.101 (a)2**	Dealers/Exhibitors who acquire animals from another licensee	24 hours (not including time in transit). SEE COMMENTS	Applies to live dogs and cats	The live dogs or cats MUST have completed an initial 5 day holding period with the first licensee to acquire the animal OR The live dogs or cats MUST have completed a 10 day holding period with the first licensee, if this licensee acquired the animal from a private or contract shelter/pound. Once the initial 5 or 10 day period is completed, each subsequent dealer/exhibitor need only hold for 24 hours (not including transit time).

Regulation	Applies To	Holding Period	Species	Comments
2.133 (a)	Municipal, contract and private pounds and shelters, Research facilities also licensed as dealers**, WHEN THESE FACILITIES SELL/PROVIDE LIVE DOGS/CATS TO LICENSED DEALERS	5 full days, to include a Saturday (not including day of acquisition and time in transit)	Applies to live dogs and cats	This is the hold performed by the pound or shelter. For random source animals: dealers must provide to recipients a certification that includes: -Information about themselves (the dealer name/address/cert#) -Recipient info (name/address/cert# if applicable, signature) -Name/address of person/pound/shelter the animal was originally acquired from, with an assurance that the person/pound/shelter was notified the animal might be used for research. -Signed statement from pound or shelter that animal met holding requirement (must include a USDA ID # ) -Date animal was acquired by dealer -Description of animal (USDA approved ID, species/breed/sex/age/color/markings) Dealers must keep certifications at least 1 yr. following disposition (research facilities must keep for 3 yrs.).

\*Municipal (city/county/state) pounds shelters cannot be licensed as dealers, and so are considered exempt sources for licensing requirements. HOWEVER, they are NOT considered exempt for the purposes of 2.38(j).

\*\*Exceptions to holding periods required by dealers/exhibitors:

2.101 (3): Animals may be euthanized at any time for disease/injury/emaciation

2.101 (4): Live dogs/cats 120 days old or less if obtained from the person who bred/raised the animal, are only subject to a 24 hour hold (excluding transit time). The same 24 hour hold applies to any subsequent dealer/exhibitor who acquires the animal.

## 7.11. Research Facility Protocol Selection Worksheet

Research Facility Protocol Selection Worksheet\*

Inspection Date:

Facility Name:

**Table 7-3. Registration Number:**

Reason Protocols Were Selected for Review:	How Many Protocols Were Selected
1. Protocols identified during inspection of concern (select all)	
2. Column E protocols (select all)	
3. Protocols with IACUC-approved exemptions/exceptions (select all)	
4. Protocols cited as noncompliant and not corrected during the last inspection (select all)	
Additional Protocols Selected: If <5 remaining protocols, select all remaining: If >5 remaining protocols, select 5 additional protocols. Protocols for each regulated species and/or, Protocols involving high risk procedures (see Chapter 7, Animal Welfare Inspection Guide for guidance).	
Total Protocols Selected and Reviewed	





# Appendices

Tip: Depending on your application settings, you may have to use CTRL-click to use hyperlinks.

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<a href="#">APHIS Form 7011A–Application for Registration</a>	<a href="#">A-16</a>
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<a href="#">APHIS Form 7019–Record of Animals on Hand (Other than Dogs and Cats)</a>	<a href="#">A-18</a>
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<a href="#">Dog</a>	<a href="#">D-4</a>
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# Appendix A. Forms and Worksheets

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The USDA APHIS forms in this Appendix are only to be used as examples. Do **not** reproduce and use these forms in an official capacity. Use only the official approved Office of Management and Budget (OMB) form or the USDA APHIS Animal Care program worksheets.

## APHIS Form 7002 – Program of Veterinary Care

<p style="font-size: small; margin: 0;">According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0036. The time required to complete this information collection is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.</p>	<div style="background-color: #00AEEF; color: white; padding: 2px 5px; border: 1px solid black; display: inline-block;">Clear Form</div> <b>OMB APPROVED</b> 0579-0036 Exp.: 10/31/2018				
<p><b>UNITED STATES DEPARTMENT OF AGRICULTURE ANIMAL AND PLANT HEALTH INSPECTION SERVICE ANIMAL CARE</b></p> <p><b>PROGRAM OF VETERINARY CARE</b></p>					
<p><b>INSTRUCTIONS</b></p> <p><b>For use of this form, see 9 CFR 2.40 (Animal Welfare Regulations, Title 9, Subchapter A, Part III, Subpart D, Section 2.40)</b></p> <p>The attending veterinarian shall establish, maintain, and supervise programs of disease control and prevention, pest and parasite control, pre-procedural and post-procedural care, nutrition, euthanasia, and adequate veterinary care for all animals on the premises of the licensee/registrant. A written program of adequate veterinary care between the licensee/registrant and the doctor of veterinary medicine shall be established. By law, such programs must include regularly scheduled visits to the premises by the veterinarian. Scheduled visits are required to monitor animal health and husbandry.</p> <p>This optional form or an equivalent format may be used to meet the requirement for a written Program of Veterinary Care. This form may be used as a guideline for developing and writing the veterinary care plan for your animals.</p> <p>Pages or blocks which do not apply to the facility should be marked N/A. If the space provided is not adequate for a specific topic, additional sheets may be added. Ensure the additional sheets include Section and Item Numbers.</p>					
<table border="1" style="border-collapse: collapse;"> <tr> <td style="padding: 2px 5px;">PAGE</td> <td style="padding: 2px 5px;">1</td> <td style="padding: 2px 5px;">of</td> <td style="padding: 2px 5px;"> </td> </tr> </table>		PAGE	1	of	
PAGE	1	of			
<p><b>SECTION I. PROGRAM ESTABLISHMENT</b></p>					
<p><b>A. LICENSEE/REGISTRANT</b></p>	<p><b>B. VETERINARIAN</b></p>				
1. NAME	1. NAME				
2. BUSINESS NAME	2. CLINIC NAME				
3. USDA LICENSE/REGISTRATION NUMBER	3. STATE LICENSE NUMBER				
4. STREET MAILING ADDRESS	4. BUSINESS ADDRESS				
5. CITY, STATE, AND ZIP CODE	5. CITY, STATE, AND ZIP CODE				
6. HOME TELEPHONE	7. BUSINESS TELEPHONE				
	8. BUSINESS TELEPHONE				
<p>We have read and completed this Program of Veterinary Care and understand our responsibilities.</p> <p>Regularly scheduled visits by the veterinarian will occur at the following frequency: _____</p>					
<p>C. NOTES:</p>   					
<p>APHIS FORM 7002 APR 2018</p>					

<input type="checkbox"/> check if not applicable	<b>SECTION II. DOGS AND CATS</b>	PAGE 2 of
--	----------------------------------	-----------

**A. VACCINATIONS – SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES**

	CANINE		FELINE	
	JUVENILE	ADULT	JUVENILE	ADULT
PARVOVIRUS			PANLEUK	
DISTEMPER			RESP. VIRUSES	
HEPATITIS			RABIES	
LEPTOSPIROSIS			OTHER (specify)	
RABIES				
BORDETELLA				
OTHER (specify)				

**B. PARASITE CONTROL PROGRAM – DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING**

1. ECTOPARASITES (fleas, ticks, mites, lice, fleas)

---

2. BLOOD PARASITES (heartworm, Babesia, Ehrlichia, other)

---

3. INTESTINAL PARASITES (fecals, deworming)

---

**C. EMERGENCY CARE – DESCRIBE PROVISIONS FOR EMERGENCY, WEEKEND, AND HOLIDAY CARE**

---

**D. EUTHANASIA**

1. SICK, DISEASED, INJURED, OR LAME ANIMALS SHALL BE PROVIDED WITH VETERINARY CARE OR EUTHANIZED. LICENSEES AND REGISTRANTS, IN CONSULTATION WITH THEIR ATTENDING VETERINARIANS, CAN USE METHODS OF EUTHANASIA THAT MEET THE DEFINITION OF EUTHANASIA IN THE ANIMAL WELFARE REGULATIONS, WHICH ALLOWS FOR THE USE OF HUMANE METHODS THAT EITHER:

- o PRODUCE RAPID UNCONSCIOUSNESS AND SUBSEQUENT DEATH WITHOUT EVIDENCE OF PAIN OR DISTRESS, OR
- o UTILIZE ANESTHESIA PRODUCED BY AN AGENT THAT CAUSES PAINLESS LOSS OF CONSCIOUSNESS AND SUBSEQUENT DEATH.

APPROPRIATE METHODS MAY INCLUDE, BUT ARE NOT LIMITED TO, THOSE DESCRIBED IN THE "AVMA GUIDELINES FOR EUTHANASIA OF ANIMALS".

EUTHANASIA WILL BE CARRIED OUT BY THE:  VETERINARIAN  LICENSEE/REGISTRANT

2. METHOD(S) OF EUTHANASIA

---

**E. ADDITIONAL PROGRAM TOPICS – THE FOLLOWING TOPICS HAVE BEEN DISCUSSED IN THE FORMULATION OF THE PROGRAM OF VETERINARY CARE:**

<input type="checkbox"/> CONGENITAL CONDITIONS	<input type="checkbox"/> EXERCISE PLAN (dogs)
<input type="checkbox"/> QUARANTINE CONDITIONS	<input type="checkbox"/> PROPER HANDLING OF BIOLOGICS
<input type="checkbox"/> NUTRITION	<input type="checkbox"/> VENEREAL DISEASES
<input type="checkbox"/> ANTHELMINTIC ALTERNATION	<input type="checkbox"/> PEST CONTROL AND PRODUCT SAFETY
<input type="checkbox"/> OTHER (specify) _____	<input type="checkbox"/> PROPER USE OF ANALGESICS AND SEDATIVES

APHIS FORM 7002  
APR 2018

<input type="checkbox"/> check if not applicable	<b>SECTION III. WILD AND EXOTIC ANIMALS</b>	PAGE 3 of
--	---	-----------

**A. VACCINATIONS – LIST THE DISEASES FOR WHICH VACCINATIONS ARE PERFORMED AND THE FREQUENCY OF THE VACCINATIONS (enter N/A if not applicable)**

CARNIVORES \_\_\_\_\_

HOOFED STOCK \_\_\_\_\_

PRIMATES \_\_\_\_\_

ELEPHANTS \_\_\_\_\_

MARINE MAMMALS \_\_\_\_\_

OTHER (specify) \_\_\_\_\_

**B. PARASITE CONTROL PROGRAM – DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING**

1. ECTOPARASITES (fleas, ticks, mites, lice, flies) \_\_\_\_\_

2. BLOOD PARASITES \_\_\_\_\_

3. INTESTINAL PARASITES \_\_\_\_\_

**C. EMERGENCY CARE**

1. DESCRIBE PROVISIONS FOR EMERGENCY, WEEKEND, AND HOLIDAY CARE \_\_\_\_\_

2. DESCRIBE CAPTURE AND RESTRAINT METHOD(S) \_\_\_\_\_

**D. EUTHANASIA**

1. SICK, DISEASED, INJURED, OR LAME ANIMALS SHALL BE PROVIDED WITH VETERINARY CARE OR EUTHANIZED. LICENSEES AND REGISTRANTS, IN CONSULTATION WITH THEIR ATTENDING VETERINARIANS, CAN USE METHODS OF EUTHANASIA THAT MEET THE DEFINITION OF EUTHANASIA IN THE ANIMAL WELFARE REGULATIONS, WHICH ALLOWS FOR THE USE OF HUMANE METHODS THAT EITHER:

- PRODUCE RAPID UNCONSCIOUSNESS AND SUBSEQUENT DEATH WITHOUT EVIDENCE OF PAIN OR DISTRESS, OR
- UTILIZE ANESTHESIA PRODUCED BY AN AGENT THAT CAUSES PAINLESS LOSS OF CONSCIOUSNESS AND SUBSEQUENT DEATH.

APPROPRIATE METHODS MAY INCLUDE, BUT ARE NOT LIMITED TO, THOSE DESCRIBED IN THE "AVMA GUIDELINES FOR EUTHANASIA OF ANIMALS".

EUTHANASIA WILL BE CARRIED OUT BY THE:  VETERINARIAN  LICENSEE/REGISTRANT

2. METHOD(S) OF EUTHANASIA \_\_\_\_\_

**E. ADDITIONAL PROGRAM TOPICS – THE FOLLOWING TOPICS HAVE BEEN DISCUSSED IN THE FORMULATION OF THE PROGRAM OF VETERINARY CARE:**

<input type="checkbox"/> PEST CONTROL AND PRODUCT SAFETY	<input type="checkbox"/> ENVIRONMENT ENHANCEMENT (primates)
<input type="checkbox"/> QUARANTINE PROCEDURES	<input type="checkbox"/> WATER QUALITY (marine mammals)
<input type="checkbox"/> ZOONOSSES	<input type="checkbox"/> SPECIES-SPECIFIC BEHAVIORS
<input type="checkbox"/> OTHER (specify) _____	<input type="checkbox"/> PROPER STORAGE AND HANDLING OF DRUGS AND BIOLOGICS
	<input type="checkbox"/> PROPER USE OF ANALGESICS AND SEDATIVES

**F. LIST THE SPECIES SUBJECTED TO TUBERCULOSIS TESTING AND THE FREQUENCY OF SUCH TESTS**

\_\_\_\_\_

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<input type="checkbox"/> check if not applicable	<b>SECTION IV. OTHER WARMBLOODED ANIMALS</b>	PAGE 4 of
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**A. INDICATE SPECIES**

---

**B. VACCINATIONS – LIST THE DISEASES FOR WHICH VACCINATIONS ARE PERFORMED AND THE FREQUENCY (enter N/A if not applicable)**

---

**C. PARASITE CONTROL PROGRAM – DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING**

1. ECTOPARASITES (fleas, ticks, mites, lice, flies)

---

2. INTERNAL PARASITES (helminths, coccidia, others)

---

**D. EMERGENCY CARE – DESCRIBE PROVISIONS FOR EMERGENCY, WEEKEND, AND HOLIDAY CARE**

---

**E. EUTHANASIA**

1. SICK, DISEASED, INJURED, OR LAME ANIMALS SHALL BE PROVIDED WITH VETERINARY CARE OR EUTHANIZED. LICENSEES AND REGISTRANTS, IN CONSULTATION WITH THEIR ATTENDING VETERINARIANS, CAN USE METHODS OF EUTHANASIA THAT MEET THE DEFINITION OF EUTHANASIA IN THE ANIMAL WELFARE REGULATIONS, WHICH ALLOWS FOR THE USE OF HUMANE METHODS THAT EITHER:

- PRODUCE RAPID UNCONSCIOUSNESS AND SUBSEQUENT DEATH WITHOUT EVIDENCE OF PAIN OR DISTRESS, OR
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APPROPRIATE METHODS MAY INCLUDE, BUT ARE NOT LIMITED TO, THOSE DESCRIBED IN THE "AVMA GUIDELINES FOR EUTHANASIA OF ANIMALS".

EUTHANASIA WILL BE CARRIED OUT BY THE:  VETERINARIAN  LICENSEE/REGISTRANT

2. METHOD(S) OF EUTHANASIA

---

**F. ADDITIONAL PROGRAM TOPICS – THE FOLLOWING TOPICS HAVE BEEN DISCUSSED IN THE FORMULATION OF THE PROGRAM OF VETERINARY CARE:**

- |   |  |
|---|--|
| <input type="checkbox"/> PASTEURELLOSIS<br><input type="checkbox"/> PODODERMATITIS<br><input type="checkbox"/> CANNIBALISM<br><input type="checkbox"/> WET TAIL<br><input type="checkbox"/> OTHER (specify) _____ | <input type="checkbox"/> SPECIES SEPARATION<br><input type="checkbox"/> MALOCCLUSION/OVERGROWN INCISORS<br><input type="checkbox"/> PEST CONTROL AND PRODUCT SAFETY<br><input type="checkbox"/> HANDLING |
|---|--|



# APHIS Form 7003A—Application for New License

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0036. The time required to complete this information collection is estimated to average 25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.		OMB APPROVED 0579-0036																														
No license may be issued unless a completed application has been received (7 U.S.C. 2132-2143), and the applicant is in compliance with the standards and regulations Section 2133.		<b>DO NOT USE THIS SPACE - OFFICIAL USE ONLY</b>																														
<b>UNITED STATES DEPARTMENT OF AGRICULTURE</b> <b>ANIMAL AND PLANT HEALTH INSPECTION SERVICE</b>  <b>APPLICATION FOR LICENSE</b> (TYPE OR PRINT)  <b>NEW LICENSE</b>		SEND THE COMPLETED FORM TO:  USDA APHIS Animal Care Eastern Regional Office 920 Main Campus Drive Suite 200 Raleigh, NC 27606																														
1. NAME OF APPLICANT AND MAILING ADDRESS: (See Instructions)		LICENSE/CUSTOMER NUMBER      EXPIRATION DATE      AMOUNT      DATE RECEIVED																														
COUNTY: _____ TELEPHONE NUMBER: _____		COUNTY: _____ TELEPHONE NUMBER: _____																														
3. IF THE APPLICANT IS A CORPORATION, PARTNERSHIP OR OTHER BUSINESS ENTITY, LIST THE ENTITY'S PARTNERS OR OFFICERS AND AGENT FOR SERVICE OF PROCESS.		4. (A) PREVIOUS USDA LICENSE NUMBER: (If any)  (B) ACTIVE USDA LICENSE NUMBER IN WHICH YOU HAVE AN INTEREST:																														
<table border="1" style="width:100%; border-collapse: collapse; font-size: x-small;"> <tr> <th colspan="2">NAME</th> <th colspan="2">TITLE</th> </tr> <tr> <td style="width: 50%; height: 40px;"></td> <td style="width: 50%;"></td> <td style="width: 50%;"></td> <td style="width: 50%;"></td> </tr> </table>		NAME		TITLE						5. TYPE OF LICENSE:  <input type="checkbox"/> Class A – Breeder <input type="checkbox"/> Class B – Dealer <input type="checkbox"/> Class C – Exhibitor																						
NAME		TITLE																														
6. LIST YOUR 12 MONTH BUSINESS YEAR: (Calendar or Fiscal)		7. TYPE OF ORGANIZATION:																														
<table border="1" style="width:100%; border-collapse: collapse; font-size: x-small;"> <tr> <th colspan="3">FROM</th> <th colspan="3">TO</th> </tr> <tr> <th>MO</th><th>DAY</th><th>YEAR</th> <th>MO</th><th>DAY</th><th>YEAR</th> </tr> <tr> <td style="width: 16.6%;"> </td><td style="width: 16.6%;"> </td><td style="width: 16.6%;"> </td> <td style="width: 16.6%;"> </td><td style="width: 16.6%;"> </td><td style="width: 16.6%;"> </td> </tr> </table>		FROM			TO			MO	DAY	YEAR	MO	DAY	YEAR							<input type="checkbox"/> Individual <input type="checkbox"/> Corporation <input type="checkbox"/> Partnership  <input type="checkbox"/> Other _____												
FROM			TO																													
MO	DAY	YEAR	MO	DAY	YEAR																											
8. DEALERS ONLY - CLASS A OR CLASS B LICENSES MUST COMPLETE THIS BLOCK (Class C Licenses go to Block 9)		9. EXHIBITORS ONLY - LIST THE LARGEST NUMBER OF ANIMALS THAT YOU HAVE HELD, OWNED, LEASED, OR EXHIBITED AT ANY ONE TIME DURING THE PREVIOUS BUSINESS YEAR (9 CFR Sections 2.6 and 2.7)																														
CLASS A (BREEDER) – LINE "D" = ½ OF LINE "C" CLASS B (DEALER) – LINE "D" = LINE C LESS THE PURCHASE COST OF THE ANIMALS SOLD. (9 CFR Sections 2.6 and 2.7)		<table border="1" style="width:100%; border-collapse: collapse; font-size: x-small;"> <tr> <th style="width: 25%;">DOGS</th> <th style="width: 25%;">NONHUMAN PRIMATES</th> <th style="width: 25%;">RODENTS (Do not include lab rats or mice)</th> </tr> <tr> <td style="height: 20px;"></td> <td></td> <td></td> </tr> <tr> <th style="width: 25%;">CATS</th> <th style="width: 25%;">MARINE MAMMALS</th> <th style="width: 25%;">WILD/EXOTIC HOOFSTOCK</th> </tr> <tr> <td style="height: 20px;"></td> <td></td> <td></td> </tr> <tr> <th style="width: 25%;">GUINEA PIGS</th> <th style="width: 25%;">FARM ANIMALS</th> <th style="width: 25%;">BEARS</th> </tr> <tr> <td style="height: 20px;"></td> <td></td> <td></td> </tr> <tr> <th style="width: 25%;">HAMSTERS</th> <th style="width: 25%;">WILD/EXOTIC CANINES</th> <th style="width: 25%;">WILD/EXOTIC MAMMALS (Not listed elsewhere)</th> </tr> <tr> <td style="height: 20px;"></td> <td></td> <td></td> </tr> <tr> <th style="width: 25%;">RABBITS</th> <th style="width: 25%;">WILD/EXOTIC FELINES</th> <th style="width: 25%;">TOTAL (All animals listed in Block 9)</th> </tr> <tr> <td style="height: 20px;"></td> <td></td> <td></td> </tr> </table>	DOGS	NONHUMAN PRIMATES	RODENTS (Do not include lab rats or mice)				CATS	MARINE MAMMALS	WILD/EXOTIC HOOFSTOCK				GUINEA PIGS	FARM ANIMALS	BEARS				HAMSTERS	WILD/EXOTIC CANINES	WILD/EXOTIC MAMMALS (Not listed elsewhere)				RABBITS	WILD/EXOTIC FELINES	TOTAL (All animals listed in Block 9)			
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C. ESTIMATE GROSS DOLLAR AMOUNT DERIVED FROM REGULATED ACTIVITIES (SALES, COMMISSIONS, ETC.) \$																																
D. ESTIMATE DOLLAR AMOUNT ON WHICH FEE IS BASED \$																																
CERTIFICATION																																
I hereby make application for a license under the Animal Welfare Act 7 U.S.C. 2131 et seq. I certify that the information provided herein is true and correct to the best of my knowledge. I hereby acknowledge receipt of and agree to comply with all the regulations and standards in 9 CFR, Subpart A, Parts 1, 2, and 3. I certify that the applicant is 18 years of age or older.																																
10. SIGNATURE:	11. PRINT NAME AND TITLE:	12. DATE:																														
APHIS FORM 7003A AUG 2011 (Previous editions are obsolete)																																



# APHIS Form 7003 – Application for License Renewal – C

<p>According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0036. The time required to complete this information collection is estimated to average .25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.</p>		<p>FORM APPROVED OMB NO.: 0579-0036</p>																										
<p>U.S. DEPARTMENT OF AGRICULTURE ANIMAL AND PLANT HEALTH INSPECTION SERVICE</p> <p style="text-align: center;"><b>APPLICATION FOR LICENSE</b> (TYPE OR PRINT)</p> <p style="text-align: center;"><b>X RENEWAL</b></p>		<p>DO NOT USE THIS SPACE-OFFICIAL USE ONLY</p> <p>SEND THE COMPLETED FORM TO: USDA APHIS ANIMAL CARE WESTERN 2150 Centre Ave. Building B, Mailstop 3W11 Fort Collins, CO 80526-8117 (970) 494-7478</p>																										
<p>1. NAME(S) OF OWNER(S) AND MAILING ADDRESS</p> <p>COUNTY:      TELEPHONE</p>		<p>2. ALL BUSINESS NAME, LOCATIONS, AND ALL SITES HOUSING ANIMALS (P. O. Box not acceptable)</p> <p style="text-align: right;">TELEPHONE (    )</p>																										
<p>3. IF PREVIOUSLY LICENSED – NAME AND ADDRESS</p> <p>PREVIOUS LICENSE NO.:</p>		<p>4. NAME AND ADDRESS OF OTHER BUSINESS(S) HANDLING ANIMALS IN WHICH APPLICANT/LICENSEE HAS AN INTEREST</p>																										
<p>5. TYPE OF LICENSE</p> <p><input checked="" type="checkbox"/> A - Dealer (Breeder)    <input type="checkbox"/> B - Dealer    <input type="checkbox"/> C - Exhibitor</p>		<p>6. DATE OF LAST BUSINESS YEAR</p> <table border="1" style="width: 100%; text-align: center;"> <tr> <th colspan="3">FROM</th> <th colspan="3">TO</th> </tr> <tr> <th>MO</th> <th>DAY</th> <th>YEAR</th> <th>MO</th> <th>DAY</th> <th>YEAR</th> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </table>		FROM			TO			MO	DAY	YEAR	MO	DAY	YEAR													
FROM			TO																									
MO	DAY	YEAR	MO	DAY	YEAR																							
<p>7. NATURE OF BUSINESS (Check item that describes nature of your business)</p> <p><input type="checkbox"/> A - Zoo                      <input type="checkbox"/> B - Aquariums                      <input type="checkbox"/> C - Auction</p> <p><input type="checkbox"/> D - Breeder                      <input type="checkbox"/> E - Pets                      <input type="checkbox"/> F - Roadside Zoo</p> <p><input type="checkbox"/> G - Circus                      <input type="checkbox"/> H - Animal Acts                      <input type="checkbox"/> I - Carnival</p> <p><input type="checkbox"/> J - Drive thru Zoo                      <input type="checkbox"/> K - Pet Store                      <input type="checkbox"/> L - Broker</p>		<p>8. TYPE OF ORGANIZATION</p> <p><input checked="" type="checkbox"/> Partnership                      <input type="checkbox"/> Corporation                      <input type="checkbox"/> Individual</p> <p><input checked="" type="checkbox"/> Other (Specify) _____</p>																										
<p>9. LIST OWNERS, PARTNERS, AND OFFICERS</p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 50%;">NAME AND TITLE</th> <th style="width: 50%;">ADDRESS</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>				NAME AND TITLE	ADDRESS																							
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<p>10. DEALER ONLY</p> <table border="1" style="width: 100%;"> <tr> <td>TOTAL NO. OF ANIMALS PURCHASED IN THE LAST BUSINESS YEAR</td> <td rowspan="4" style="background-color: black; width: 150px;"></td> </tr> <tr> <td>TOTAL NO. OF ANIMALS SOLD IN THE LAST BUSINESS YEAR</td> </tr> <tr> <td>TOTAL GROSS AMOUNT DERIVED FROM THE SALE OF ANIMALS</td> </tr> <tr> <td>DOLLAR AMOUNT OF WHICH FEE IS BASED (Sections 2.6 and 2.7)</td> </tr> </table>		TOTAL NO. OF ANIMALS PURCHASED IN THE LAST BUSINESS YEAR		TOTAL NO. OF ANIMALS SOLD IN THE LAST BUSINESS YEAR	TOTAL GROSS AMOUNT DERIVED FROM THE SALE OF ANIMALS	DOLLAR AMOUNT OF WHICH FEE IS BASED (Sections 2.6 and 2.7)	<p>11. EXHIBITOR ONLY (No. of animals holding now or held during the last business year, whichever is greater)</p> <table border="1" style="width: 100%;"> <tr> <td>DOGS</td> <td> </td> <td>RABBITS</td> <td> </td> </tr> <tr> <td>CATS</td> <td> </td> <td>NONHUMAN PRIMATES</td> <td> </td> </tr> <tr> <td>GUINEA PIGS</td> <td> </td> <td>MARINE MAMMALS</td> <td> </td> </tr> <tr> <td>HAMSTERS</td> <td> </td> <td>WILD OR EXOTIC MAMMALS</td> <td> </td> </tr> <tr> <td>OTHER (i.e., farm animals) (List Species and No.)</td> <td colspan="3" style="text-align: center;">TOTAL:</td> </tr> </table>		DOGS		RABBITS		CATS		NONHUMAN PRIMATES		GUINEA PIGS		MARINE MAMMALS		HAMSTERS		WILD OR EXOTIC MAMMALS		OTHER (i.e., farm animals) (List Species and No.)	TOTAL:		
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<p><b>CERTIFICATION</b></p> <p>I hereby make application for a license under the Animal Welfare Act 7 U.S.C. 2131 et seq. I certify that the information provided herein is true and correct to the best of my knowledge. I hereby acknowledge receipt of and certify to the best of my knowledge I am in compliance with all regulations and standards in 9 CFR, Subpart A, Parts 1, 2, and 3. I certify that I am over 18 years of age.</p>																												
<p>12. SIGNATURE</p>		<p>13. NAME AND TITLE (Type or Print)</p>	<p>14. DATE</p>																									

APHIS FORM 7003  
(JAN 1995)

(Previous editions are obsolete)

# APHIS Form 7005—Record of Acquisition of Dogs and Cats on Hand

According to the Paperwork Reduction Act of 1995, no agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control numbers for this information collection are 0579-0036 and 0579-0392. The time required to complete this information collection is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

OMB APPROVED  
0579-0036 and 0579-0392

**UNITED STATES DEPARTMENT OF AGRICULTURE**  
**ANIMAL AND PLANT HEALTH INSPECTION SERVICE**

## RECORD OF ACQUISITION OF DOGS AND CATS ON HAND

This record is required by law (7 U.S.C. 2131-2156), (9 CFR, Subchapter A, Parts 1, 2, and 3). Failure to maintain this record can result in a suspension or revocation of license and/or imprisonment for not more than 1 year, or a fine of not more than \$1,000, or both.

1. RECORD FOR ("X")		USDA LICENSE OR REGISTRATION NUMBER		2. NAME AND ADDRESS OF LICENSEE, REGISTRANT, OR HOLDING FACILITY		3. BUSINESS YEAR		4. PAGE NUMBER				
		<input type="checkbox"/> Dealer	<input type="checkbox"/> Holding Facility (Submit copy to Dealer)	<input type="checkbox"/> Other	<input type="checkbox"/> Exhibitor (Dogs and Cats only)	FROM (Mo., Day, Yr.)	TO (Mo., Day, Yr.)					
A. TATTOO OR USDA TAG NUMBER		B. IDENTIFICATION OF EACH ANIMAL BEING DELIVERED (See reverse for Breed Abbreviations)		E. AGE OR DATE OF BIRTH	F. BREED OR TYPE (If mixed breed list 2 dominant breeds)	G. DESCRIPTION OF ANIMAL (Color, Distinctive Marks, Hair, Tail, Tattoos, etc.)	H. DATE ACQUIRED	I. NAME AND ADDRESS, USDA LICENSE OR REGISTRATION NUMBER, OR DRIVER'S LICENSE NUMBER AND STATE, VEHICLE LICENSE NUMBER AND STATE	J. Date Removed or Sold	K. Date Died or Euthanized (Specify)		
		D. CAT "X" M OR F	C. DOG "X" M OR F									
		M	F									
		M	F									
		M	F									
		M	F									
		M	F									
		M	F									
		M	F									
APHIS 7005 JUL 2009		INSPECTOR USE ONLY		LAST INSPECTION (Date)		TOTAL NUMBERS ANIMALS ENTERED SINCE LAST INSPECTION		COUNT TOTAL NUMBERS ANIMALS ACTUALLY ON PREMISES		DIFFERENCE (+ OR -)	DATE	INITIALS

Previous edition may be used. Replaces VS 18-5 which may be used.

**BREED ABBREVIATIONS – DOGS (Column F)**

Afghan Hound	- AH	Dachshund	- DH	Komondor	- KM	Shih-tzu	- SI
Airedale Terrier	- AD	Dalmatian	- DL	Labrador Retriever	- LR	Silky Terrier	- ST
Akita	- AK	Doberman	- DB	Lhasa Apso	- LA	Spitz	- SZ
American Bull Terrier	- AB	Elkhound	- EH	Malamute	- MM	Springer Spaniel	- SR
Basset Hound	- BS	English Bulldog	- EB	Mastiff	- MA	Staffordshire Bull Terrier	- SA
Beagle	- BH	English Setter	- ES	Maltese	- MT		
Bedlington Terrier	- BE	Eskimo Dog	- ED	Miniature Pinscher	- MP	Walker	- WK
Bichon Frise	- BL	Foxhound	- FH	Newfoundland	- NF	Weimaraner	- WI
Black and Tan Coonhound	- BF	Fox Terrier	- FT	Old English Sheepdog	- OE	Welsh Corgi	- WC
Bluetick Coonhound	- BT	French Bulldog	- FB	Pekingese	- PK	Whippet	- WH
Boston Terrier	- BK	German Shepherd	- GS	Pomeranian	- PM	Yorkshire Terrier	- YT
Boxer	- BX	German Short Haired Pointer	- SH	Poodle	- PO	Other (Specify)	
Bullmastiff	- BM	Golden Retriever	- GR	Pug	- PU		
Cairn Terrier	- CT	Gordon Setter	- GO	Redbond Coonhound	- RB		
Catahoula	- CU	Great Dane	- GD	Rhodesian Ridgeback	- RR		
Chihuahua	- CA	Great Pyrenees	- GP	Rottweiler	- RW		
Chinese Crested Dog	- CD	Greyhound	- GH	Saint Bernard	- SB		
Chow-Chow	- CC	Husky	- HK	Samoyed	- SM		
Cocker Spaniel	- CK	Irish Setter	- IS	Schipperkee	- SK		
Collie	- CL	Jack Russell Terrier	- JR	Schnauzer	- SN		
Coonhound (Specify)	- CH	Keeshond	- KH	Scottish Terrier	- SC		
		King Charles Spaniel	- KC	Shar-pei	- SP		
				Shetland Sheepdog	- SS		

**BREED ABBREVIATIONS – CATS (Column F)**

Abyssinian	- AB	Manx	- MX	Hound Crossbreed	- HX
Burmese	- BU	Persian	- PR	Terrier Crossbreed	- TX
Domestic Long Hair	- DL	Russian Blue	- RB	Shepherd Crossbreed	- SX
Domestic Short Hair	- DS	Rex	- RE	Spaniel Crossbreed	- PX
Himalayan	- HM	Siamese	- SI		
Maine Coon	- MC	Other (Specify)			

APHIS 7005 (REVERSE)  
JUL 2008



**BREED ABBREVIATIONS – DOGS** (*Column F*)

Afghan Hound	- AH	English Setter	- ES	Pomeranian	- PM
Airedale Terrier	- AD	Eskimo Dog	- ED	Poodle	- PO
Akita	- AK	Foxhound	- FH	Pug	- PU
American Bull Terrier	- AB	Fox Terrier	- FT	Redbone Coonhound	- RB
Basenji	- BS	French Bulldog	- FB	Rhodesian Ridgeback	- RR
Basset Hound	- BH	German Shepherd	- GS	Rottweiler	- RW
Beagle	- BE	German Short Haired Pointer	- SH	Saint Bernard	- SB
Bedlington Terrier	- BL	Golden Retriever	- GR	Samoyed	- SM
Bichon Frise	- BF	Gordon Setter	- GO	Schipperkee	- SK
Black and Tan Coonhound	- BT	Great Dane	- GD	Schnauzer	- SN
Bluetick	- BK	Great Pyrenees	- GP	Scottish Terrier	- SC
Boston Terrier	- BO	Greyhound	- GH	Shar-pei	- SP
Boxer	- BX	Husky	- HK	Shetland Sheepdog	- SS
Bullmastiff	- BM	Irish Setter	- IS	Shih-tzu	- SI
Cairn Terrier	- CT	Jack Russell Terrier	- JR	Silky Terrier	- ST
Catahoula	- CU	Keeshond	- KH	Spitz	- SZ
Chihuahua	- CA	King Charles Spaniel	- KC	Springer Spaniel	- SR
Chinese Crested Dog	- CD	Komondor	- KM	Staffordshire Bull Terrier	- SA
Chow-Chow	- CC	Labrador Retriever	- LR	Walker	- WK
Cocker Spaniel	- CK	Lhasa Apso	- LA	Weimaraner	- WI
Collie	- CL	Malamute	- MM	Welsh Corgi	- WC
Coonhound ( <i>Specify</i> )	- CH	Mastiff	- MA	Whippet	- WH
Dachshund	- DH	Maltese	- MT	Yorkshire Terrier	- YT
Dalmatian	- DL	Miniature Pinscher	- MP	Other ( <i>Specify</i> )	
Doberman	- DB	Newfoundland	- NF		
Elkhound	- EH	Old English Sheepdog	- OE		
English Bulldog	- EB	Pekingese	- PK		

**BREED ABBREVIATIONS – CATS** (*Column F*)

**TYPE** (*Column F*)

Abyssinian	- AB	Manx	- MX	Other ( <i>Specify</i> )	Hound Crossbreed	- HX
Burmese	- BU	Persian	- PR		Terrier Crossbreed	- TX
Domestic Long Hair	- DL	Russian Blue	- RB		Shepherd Crossbreed	- SX
Domestic Short Hair	- DS	Rex	- RE		Spaniel Crossbreed	- PX
Himalayan	- HM	Siamese	- SI			
Maine Coon	- MC					

APHIS 7006 (REVERSE)  
JUL 2009





According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0036. The time required to complete this information collection is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

## APHIS Form 7011A—Application for Registration

Customer ID# \_\_\_\_\_

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0036. The time required to complete the information collection is estimated to average .25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.		Every research facility, carrier, and intermediate handler not required to be licensed under Section 3 of the Animal Welfare Act, shall register with the USDA (7 U.S.C. 2136). This application provides information for such registration.	<b>OMB</b> Approved 0579-0036				
UNITED STATES DEPARTMENT OF AGRICULTURE ANIMAL AND PLANT HEALTH INSPECTION SERVICE <h3 style="margin: 0;">APPLICATION FOR REGISTRATION</h3> (TYPE OR PRINT)  <h3 style="margin: 0;">NEW REGISTRATION</h3>		<b>USDA USE ONLY</b> Applicant will send completed form to this address:  USDA-APHIS-Animal Care 920 Main Campus Dr. Suite 200 Raleigh, NC 27606					
		CERTIFICATE NUMBER/CUSTOMER NUMBER _____	RENEWAL DATE _____				
1. REGISTRANT (Name and permanent mailing address, including ZIP Code):  COUNTY: _____ TELEPHONE NUMBER: _____		2. ALL BUSINESS NAMES AND SITE LOCATION(S). <input type="checkbox"/> Use additional sheets, if necessary					
3. PREVIOUS USDA REGISTRATION NUMBER (if any): _____		4. ACTIVE USDA CERTIFICATE NUMBER(S) IN WHICH YOU HAVE AN INTEREST: _____					
5. ARE YOU USING FEDERAL FUNDS TO CARRY OUT RESEARCH, TESTS, OR EXPERIMENTS? <input type="checkbox"/> Yes <input type="checkbox"/> No		6. TYPE OF REGISTRATION: <input type="checkbox"/> Class H – Intermediate Handler <input type="checkbox"/> Class T – Carrier <input type="checkbox"/> Class R - Research Facility					
7. TYPE OF ORGANIZATION: <input type="checkbox"/> Individual <input type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Other _____							
8. IF INDIVIDUAL, IDENTIFY THE OWNER; IF PARTNERSHIP, IDENTIFY EACH PARTNER OR OFFICER; IF CORPORATION OR OTHER, IDENTIFY PRINCIPAL OFFICERS. FOR RESEARCH FACILITIES INCLUDE THE NAME OF THE INSTITUTIONAL OFFICIAL. (Use separate sheet, if needed)		9. CHECK THE TYPE OF ANIMAL(S) USED IN YOUR BUSINESS.					
A. NAME	B. TITLE	DOGS	<input type="checkbox"/>	NONHUMAN PRIMATES	<input type="checkbox"/>	RODENTS (Do not include lab rats or mice)	<input type="checkbox"/>
		CATS	<input type="checkbox"/>	MARINE MAMMALS	<input type="checkbox"/>	WILD/EXOTIC HOOFSTOCK	<input type="checkbox"/>
		GUINEA PIGS	<input type="checkbox"/>	FARM ANIMALS	<input type="checkbox"/>	BEARS	<input type="checkbox"/>
		HAMSTERS	<input type="checkbox"/>	WILD/EXOTIC CANINES	<input type="checkbox"/>	WILD/EXOTIC MAMMALS (Not listed elsewhere)	<input type="checkbox"/>
		RABBITS	<input type="checkbox"/>	WILD/EXOTIC FELINES	<input type="checkbox"/>	OTHER	<input type="checkbox"/>
CERTIFICATION I hereby register as a Research Facility, Carrier, or Intermediate Handler under the Animal Welfare Act, 7 U.S.C. 2131 et seq. and I certify that the information provided herein is true and correct to the best of my knowledge. I hereby acknowledge receipt of and agree to comply with all the regulations and standards contained in 9 CFR, Subpart A, parts 1, 2 and 3. I certify that all listed persons are 18 years of age or older.							
10. SIGNATURE _____		11. NAME AND TITLE (Type or Print) _____			12. DATE SIGNED _____		
ACKNOWLEDGMENT OF RECEIPT OF REGULATIONS AND STANDARDS							
APHIS FORM 7011A MAR 2013							





## APHIS Form 7020—Record of Acquisition, Disposition or Transport of Animals (Other Than Dogs and Cats)

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control numbers for this information collection are 0579-0036 and 0579-0093. The time required to complete this information collection is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.										OMB APPROVED 0579-0036 0579-0093			
<b>UNITED STATES DEPARTMENT OF AGRICULTURE ANIMAL AND PLANT HEALTH INSPECTION SERVICE</b>										1. INVOICE NUMBER		2. PAGE	
<b>RECORD OF ACQUISITION, DISPOSITION OR TRANSPORT OF ANIMALS (Other Than Dogs and Cats)</b>										3. DATE OF DISPOSITION			
<input type="checkbox"/> SALE <input type="checkbox"/> EXCHANGE OR TRANSFER <input type="checkbox"/> DONATION										4. DEALER'S LICENSE NUMBER			
This record is required by law (7 U.S.C. 2131-2156); (9 CFR, Subchapter A, Parts 1, 2, and 3). Failure to maintain this record can result in a suspension or revocation of license and/or imprisonment for not more than 1 year, or a fine of not more than \$1,000, or both.										6. BUYER OR RECEIVER (Name and Address, include ZIP Code)			
INSTRUCTIONS: Complete applicable items 1 through 13. Original and one copy to accompany animals. When delivery is made – Items 14 through 20 must be completed by Buyer (Receiver) and copy one returned to Dealer (Seller or Donor). Copy two to be retained by Dealer (Seller or Donor). Attach Continuation Sheet (APHIS Form 7020A), as needed.										7. USDA LICENSE NUMBER (if any)			
<b>8. IDENTIFICATION OF ANIMALS BEING DELIVERED</b>													
A. CONTAINER TAG NUMBER, CRATE OR PEN NUMBER	B. NUMBER ANIMALS	C. PREVIOUS INVOICE NUMBER (if any)	D. INDIVIDUAL IDENTIFICATION TATTOOS, TAG NUMBERS (if applicable)	E. SPECIES	F. AGE - SEX				H. EST. WEIGHT (lbs.)	I. REMARKS (Condition, etc.)	RECEIVER'S USE		
					G. NUMBER YOUNG		G. NUMBER ADULT				J.	K.	
					M	F	M	F					
					M	F	M	F					
					M	F	M	F					
					M	F	M	F					
					M	F	M	F					
					M	F	M	F					
					M	F	M	F					
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					M	F	M	F					
					M	F	M	F					
					M	F	M	F					
					M	F	M	F					
					M	F	M	F					
					M	F	M	F					
<b>DELIVERY BY COMMERCIAL CARRIER</b>													
9. DELIVERY BY ("X" one)					10. TRUCK LICENSE NUMBER				11. BILL OF LADING NUMBER				
<input type="checkbox"/> Buyer's Truck <input type="checkbox"/> Dealer's Truck (Seller or Donor)													
12. NAME AND ADDRESS OF COMPANY OR FIRM (Include ZIP Code)						13. NAME AND ADDRESS OF TRUCK DRIVER (Include ZIP Code)							
<b>DELIVERY RECEIPT – TO BE COMPLETED BY BUYER OR RECEIVER</b>													
14. ANIMALS DELIVERY WERE ("X" one)													
<input type="checkbox"/> IN APPARENT GOOD CONDITION				<input type="checkbox"/> POOR CONDITION				<input type="checkbox"/> REJECTED (Attach explanation for rejection)					
15. TOTAL NUMBER RECEIVED				16. NUMBER DEAD				17. NUMBER ALIVE					
18. BY (Signature)						19. TITLE				20. DATE			

APHIS FORM 7020  
JUL 2012



# APHIS Form 7023--Annual Report of Research Facility

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0570-0030. The time required to complete this information collection is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

This report is required by law (7 U.S.C. 2143). Failure to report according to the regulations can result in an order to cease and desist and to be subject to penalties as provided for in Section 2180.

OMB APPROVED  
0570-0030  
Exp.: 10/31/2018

Interagency Report Control  
No. 0180-DOA-AN

Fiscal Year 2016

**UNITED STATES DEPARTMENT OF AGRICULTURE  
ANIMAL AND PLANT HEALTH INSPECTION SERVICE**

**ANNUAL REPORT OF RESEARCH FACILITY**  
(TYPE OR PRINT)

1. REGISTRATION NUMBER

2. HEADQUARTERS RESEARCH FACILITY (Name, address, and telephone number as registered with USDA. Include ZIP Code)

3. REPORTING FACILITY (List all locations where animals were housed or used in actual research, testing, teaching, or experimentation, or held for these purposes. Attach additional sheets, if necessary.)

FACILITY LOCATIONS (Sites)

REPORT OF ANIMALS USED BY OR UNDER CONTROL OF RESEARCH FACILITY (Attach additional sheets, if necessary, or use APHIS FORM 7023A.)

A. Animals Covered By The Animal Welfare Regulations	B. Number of animals being bred, conditioned, or held for use in teaching, testing, experiments, research, or surgery but not yet used for such purposes.	C. Number of animals upon which teaching, research, experiments, or tests were conducted involving no pain, distress, or use of pain-relieving drugs.	D. Number of animals upon which experiments, teaching, research, surgery, or tests were conducted involving accompanying pain or distress to the animals and for which appropriate anesthetic, analgesic, or tranquilizing drugs were used.	E. Number of animals upon which teaching, experiments, research, surgery, or tests were conducted involving accompanying pain or distress to the animals and for which the use of appropriate anesthetic, analgesic, or tranquilizing drugs would have adversely affected the procedures, results, or interpretation of the teaching, research, experiments, surgery, or tests. (An explanation of the procedures producing pain or distress on these animals and the reasons such drugs were not used must be attached to this report.)	F. TOTAL NUMBER OF ANIMALS (Cols. C + D + E)
4. Dogs					0
5. Cats					0
6. Guinea Pigs					0
7. Hamsters					0
8. Rabbits					0
9. Non-human Primates					0
10. Sheep					0
11. Pigs					0
12. Other Farm Animals					0
13. Other Animals					0

**ASSURANCE STATEMENTS**

- Professionally acceptable standards governing the care, treatment, and use of animals, including appropriate use of anesthetic, analgesic, and tranquilizing drugs, prior to, during, and following actual research, teaching, testing, surgery, or experimentation were followed by this research facility.
- Each principal investigator has considered alternatives to painful procedures.
- This facility is adhering to the standards and regulations under the Act, and it has required that exceptions to the standards and regulations be specified and explained by the principal investigator and approved by the Institutional Animal Care and Use Committee (IACUC). A summary of all such exceptions is attached to this annual report. In addition to identifying the IACUC approved exceptions, this summary includes a brief explanation of the exceptions, as well as the species and number of animals affected.
- The attending veterinarian for this research facility has appropriate authority to ensure the provisions of adequate veterinary care and to oversee the adequacy of other aspects of animal care and use.

**CERTIFICATION BY HEADQUARTERS RESEARCH FACILITY OFFICIAL**  
(Chief Executive Officer (C.E.O.) or Legally Responsible Institutional Official (L.O.))  
I certify that the above is true, correct, and complete (7 U.S.C. Section 2143).

SIGNATURE OF C.E.O. OR L.O.	NAME AND TITLE OF C.E.O. OR L.O. (Type or Print)	DATE SIGNED

APHIS FORM 7023  
JUL 2013





## APHIS Form 7023 - Instructions

### **Instructions for Completion of APHIS Form 7023**

*(Refer to 9 CFR, Part 2, Subpart C, Section 2.33 and 2.36)*

- Item 1- Enter registration number as assigned to the Research Facility by the United States Department of Agriculture (USDA).
- Item 2- Enter the complete name and mailing address of the Headquarters Research Facility as registered with the USDA. If the name or business information has changed, please notify the appropriate Operations Office in Raleigh NC, or Ft. Collins, CO in writing as soon as possible. Correcting the information on your annual report packet is not sufficient.
- Item 3- List location of each site where the animals are housed and used in actual research, teaching, experimentation, or held for these purposes. (Attach additional sheets if necessary). Provide site information, but do not include specific buildings or room numbers.
- Item 4-13- DO NOT enter numbers in Column A. DO NOT add numbers entered in Column B into the totals in Column F. Column F is to show only the total numbers entered in Columns C + D + E. Entries in Column E must be explained on attached sheet(s).
- Item 12: List by common name all other farm animal species.
- Item 13- Other: List, by common name, all other warm-blooded animal species covered by the Regulations. (This will include all wild or exotic species). Use additional sheets if necessary or use APHIS Form 7023A. Report wild rodents. Please do NOT report the use of laboratory rats and mice (genera *rattus* and *mus*) bred for use in research, birds, reptiles, fish or other animals which are exempt from the regulation under the AWA. Do NOT include animals used in clinical trials in the context of a veterinary client relationship and do NOT include animals used in a field study as defined under the Animal Welfare Act. If you have questions about a particular activity, please contact the appropriate Operations Office in Raleigh NC, or Ft. Collins, CO for guidance.

**\*\*Return Completed Form with an Original Signature of C.E.O., President, or Institutional Official to the Appropriate Office. \*\*\***

## Amended Inspection Report Letter



United States  
Department of  
Agriculture

Marketing and  
Regulatory  
Programs

Animal and Plant  
Health Inspection  
Services

Animal Care

920 Main Campus Drive  
Suite 200  
Raleigh, NC 27606

Tel No. 919-855-7100  
Fax No. 919-855-7123

<NAME>  
<ADDRESS>

<DATE>

Dear \_\_\_\_\_:

This amended inspection report, dated xx/xx/xx by the signature block,  
replaces the previous inspection report dated xx/xx/xx by the signature block.  
The previous inspection report is no longer valid.

Respectfully,

<YOUR NAME>



Animal Care is a part of the Department of Agriculture's Animal and Plant Health Inspection Service.

An Equal Opportunity Provider and Employer

## Complaint Worksheet

(For internal use only)



### USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT		
Complaint No.	Date Entered:	Processed By:
Referred To:		Reply Due:
Facility or Person Complaint Filed Against		
Name:	Customer No.:	License No.:
Address:		Email Address:
City:	State:	Phone No.:
Complainant Information		
Name:	Organization:	
Address:		Email Address:
City:	State:	Phone No.:
How was the Complaint received? Email		
Details of Complaint: SEE ATTACHED		
Results:		
Application Kit Provided: Yes: <input type="checkbox"/> No: <input type="checkbox"/>		
Inspector:		Date:
Reviewed By:		Date:

## Environmental Enrichment Plan Inspection Checklist

### Environment Enhancement Plan Inspection Checklist Instructions

The Environment Enhancement Plan (EEP) Checklist is intended to help you and the licensee evaluate EE plans. There is no requirement that you use this Checklist. And there is no requirement that an EE plan contain everything on this list.

At facilities, you will see enrichment activities that meet the requirements and are not on this checklist, and that is acceptable. This list is not all inclusive. This is just another tool to help us consider the factors that go into appropriate enrichment.

This Checklist may be used:

- By a new inspector or for training a new inspector
- To prepare for an inspection if you have not reviewed EE Plans in a while
- To assist applicants develop their plans
- To assist licensees if they have a change in their inventory, or have some EE NCIs, or just want to be sure they don't miss anything

**NOTE: The form should not be retained in ACIS or any facility file. It can be left with the licensee or disposed of at the end of the inspection.**

**FOR APHIS INTERNAL USE****§3.81 Environment Enhancement Plan Inspection Checklist**

Licensee/Registrant has a written EEP  EEP has been approved by the AV

**Social needs (a)**

**Housing**

Group

Pair

Intermittent social contact

Partial social contact

Single

justification for single housing available

Visual and auditory contact with conspecifics (or compatible species) is provided (a)(3)

Other:

Plan to meet social needs for individually housed primates

**Special Considerations (c)**

Infants and young juveniles (c)(1)

Maternal care for infants (*until at least 6 months of age*)

Social needs of early weaned infants are met

Appropriate social opportunities are provided to juveniles

NHPs exempted from the EEP are present

Animals exempted from all or part of the EEP receive special attention (c)(3) or (c)(4)

Exemption is either specified as permanent or reviewed by the AV every 30 days (e)(1)

Chimpanzees over 110lbs are present

provided with additional opportunities to express species typical behavior (c)(5)

**Program for identifying and managing abnormal behavior (c)(2)**

facility staff is able to recognize abnormal behavior

Program for behavior assessment

Abnormal behavior observed during inspection

hyperaggressiveness

stereotypy

self directed behavior

alopecia

abnormal posture

If abnormal behavior observed:

Program for managing abnormal behavior

Program for managing abnormal behavior is assessed and modified as needed

**Environmental Enrichment (b)**

**Structure and Substrate**

Opportunities to express species-typical postures for resting, sleeping, feeding, exploration and play

Perches

Mirrors

Nest boxes (*e.g. marmosets, tamarins, owl monkeys, eye apes*)

Nesting material (*e.g. great apes*)

Scent marking materials (*e.g. squirrel monkeys, capuchins, marmosets, tamarins, most prosimians*)

Opportunities to express species-typical locomotion

Swings, ladders, ropes Brachiation

(*great apes, lesser apes, spider monkeys, woolly monkeys*) \*See Policy #7

Opportunities to make social adjustments

Visual barriers

Other:

**Foraging and Exploration**

**Foraging enrichment**

Puzzle feeders (*includes cup feeders, fishing feeders, etc.*)

Foraging boards/feeding

Produce requiring processing

Items are regularly filled

Supplies to fill forage devices are present

Program for sanitation and novelty

**Manipulanda**

Toys (*provided to ALL animals*)

Program for sanitation and novelty

**Varied sensory stimuli**

Variety of produce offered

Visual stimulation

Olfactory enrichment

Auditory enrichment

Other:

Each item/check box on this list is NOT a requirement under AWR 3.83, the items are listed as commonly used means to meet the requirements for social needs and opportunities to express species typical behavior. The intent of the checklist is to help conduct a thorough assessment of the EEP. The form should not be retained and can be left with the licensee/registrant or disposed of at the end of the inspection.

## Inspection Report Review Checklist

### FOR APHIS INTERNAL USE

#### INSPECTION REPORT REVIEW CHECKLIST

When reviewing an Inspection Report, the reviewer should make sure that all the applicable criteria below are met:

##### General Information

- Inspection type is correct (Routine, PL Inspection #1, Site Additions are marked as Routine, etc.)
- Report not written on a canceled site
- "Prepared by": same as or later than "Inspection date"
- "Received by" date: before earliest correction deadline, 5 days or less from "Inspection date", and same as or after "Prepared by"
- Name in "Received by" matches licensee name or is a facility representative
- Certified mail number included on report, if applicable
- Reports with Directs were not emailed or sent certified mail

##### Narrative

- If no NCIs, Report has appropriate statement
- NCI citation contains all 4 4 parts, if appropriate
  - Regulation (appropriate section and specific subparts for the NCI)
  - Description of NCI (clear, appropriate details including animal ID, no diagnosis)
  - Why the problem is an NCI (appropriate, reasonable consequence)
  - Appropriate general description of how licensee/registrant can correct the problem, and a reasonable correction deadline (unless Repeat, PL, or New Site Approval inspection)
- Narrative is clear, reasonably free of improper grammar or spelling errors, and objective
- Direct NCIs appropriately classified (unless PL)
- Same problem is not cited in multiple CFRs, unless appropriate
- Focused inspections are appropriately described
- Final statement regarding who conducted the inspection and the exit briefing and when it occurred if report not delivered day of inspection
- Amended reports are not noted as "Amended"
- No extraneous, unrelated, or inappropriate information
- Report follows all Inspection Guide requirements and supervisory guidance
- Pre-License reports have all required statements
  - Passing PL: type license requested and payment information
  - Non-passing PL: how many inspections left and deadline date for 90 days window
  - All PL: no regulated activity statement
- Look at previous report(s) to verify Repeat NCIs
- Repeats notated correctly, i.e., inspector didn't shift section numbers (e.g. 3.1 vs. 3.6 for same problem)

- Inspections not occurring on exact same date each year

**Documentation (photos, videos, document)**

- Required photos for Repeats, Directs, Corrected Directs, Corrected Vet Care, all NCIs at facility with ongoing IES investigation, and commercial airlines
- Documentation clearly and accurately depicts the NCI
- Close-ups and overviews are included as needed for orientation
- Animal IDs included in picture labels for vet care, space, and when appropriate
- Animals are present in the photo (if possible)
- Uploaded or photographed documents or records are readable
- View videos and listen to audio to ensure content is appropriate and depicts NCIs
- If documentation contains confidential business information, ensure this is noted in label
- Labels are present for all documentation and are sufficiently detailed
- Documentation assigned to appropriate CFR(s) unless showing corrected items or overviews
- Note if documentation depicts an NCI not included on report
- Note if required photographs were not included
- If documentations does not support NCIs or raises any concerns, make note to discuss with inspector

**Animal Inventory**

- Verify inventory included
- Assess completeness (numbers make sense with NCI narratives, all species mentioned in report are included, etc.)
- Note unusually large facilities or unusual mixes of species (e.g. 3000 pigs; 300 dogs + 1 tiger)

**Information which should NOT be on the Inspection Report**

- No licensee names in body of report
- No addresses of animal facilities or inappropriately detailed building descriptions
- No confidential business information
- No proprietary scientific information

If any errors are noted by the non-Supervisor reviewer, the Inspection Report should be referred to the Supervisor. Supervisors will contact the inspector to discuss the Inspection Report.

**August 2016**

## Marine Mammal Facility Inspection Guidance

A licensee who conducts regulated activity with marine mammals **must** meet all applicable Regulations and Standards, including the transportation Standards.

### Conducting the Inspection

Prior to inspecting a marine mammal facility, you should review the Marine Mammal Standards, Subpart E and the facility's recent inspection history.

When inspecting a facility with marine mammals, some items to evaluate are listed below.

### Veterinary Care

Marine mammals must be provided adequate veterinary care, including but not limited to:

- All marine mammals must be visually examined by the attending veterinarian at least semiannually. Also, all cetacean or sirenian must be physically examined by the attending veterinarian annually, unless APHIS grants an exception based on considerations related to the health and safety of the cetacean or sirenian.
- Each marine mammal must have medical records that include physical examination information
- Review records for each animal with medical concerns or under treatment first. Verify that animals with inappetence over 24 hours are documented and the attending veterinarian has been notified.
- Ask about any births or deaths
- Ask how the facility cleans, disinfects and stores equipment used for medical/husbandry behavior training (*e.g.*, gastric tubes, toothbrush, sample collection containers)
- Ask if any marine mammals are in quarantine or isolation and why
- Ensure that quarantine or isolation pools/areas for marine mammals held for **nonmedical** purposes meet the minimum space requirements
- Review the medical records and attending veterinarian justification for any marine mammals held for **medical** purposes for more than 2 weeks in quarantine or isolation pools/areas that **do not** meet the minimum space requirements
- Evaluate and inspect holding areas (for isolation, separation and treatment):
  - If a marine mammal is kept separated or isolated, there should be veterinary justification and provisions for periodic review of the plan by the attending veterinarian



- Review necropsy/histopathology reports
- Review any incident, husbandry, daily feeding and supplement logs and training logs

## Space

Marine mammal primary enclosures must meet the space requirements in section 3.104.

### 7.11.1.1. Space requirements for marine mammals housed in unusual circumstances

Situations that may require further evaluation of space to assess compliance for marine mammal pools may include:

- Irregularly shaped pools
- Pools with islands or obstructions within the swimming area of the animals
- Pools with varying depths, where the shallow areas of the pool do not meet the minimum depth requirement for the species housed
- Pools with gates or channels that must be included in the minimum horizontal dimension (MHD) calculation for the pool to meet the required minimum horizontal dimension

Gather clear documentation necessary to submit to your SACS to thoroughly assess the situation. This documentation should include photographs and measurements.

**Photographic documentation** should include, but not be limited to:

- Document the pool(s) using photographs taken from at least two different angles, with photos taken across the width and length of the pool, or two different views of a round or irregular pool
- Include two-view photographs of obstructions, such as islands or pool outcroppings that may impede an animal's ability to swim within the pool
- Include close-up and distance photographs of channels, gates, and/or narrow areas that may require animals to adjust their swimming patterns. Include photographs taken looking down from the side of the pool, documenting the depth of the channel, gate design, or shallow areas.
- Include photographs of channels, outcroppings, or islands taken from underwater viewing windows, when possible
- Try to obtain video footage of the animals swimming in the pool, optimally when they are passing through gates, narrow channels, or swimming in a pattern around an island, to determine the animals' ability to navigate the narrow or irregular areas or to document the animals' ability to swim through shallow sections that do not meet the depth requirement

**Measurements** should include, but not be limited to:

- Measurements of the depth, width and length or circumference of shallow areas of the pool that are non-compliant and that require further assessment
- For pools with a sloping bottom, determine from either architectural plans, or from your own measurements, the approximate point at which the pool is a compliant depth for the largest species housed
- Create a map of the pool indicating the areas meeting the minimum depth requirements
- Measure the length, width, and depth of all channels that are necessary for the animals to use
- Determine from written records, facility personnel or SOP the amount of time gates are left open for the animals to access separate areas of the pool
- Measure the width, length, and depth of irregular areas of the pool if there is a question about calculating the MHD of the pool

## Feeding

Food for marine mammals must be wholesome, palatable and free from contamination and must be of sufficient quantity and nutritive value to maintain marine mammals in good health.

To minimize nutrient loss and bacterial contamination, frozen or thawed food must be stored, thawed and prepared properly. At a minimum, you should:

- Inquire about the source(s) of the food
- Inquire about types of food being fed and their nutrient analysis. Diets must be prepared with consideration for factors such as age, species, condition, and size of the marine mammal being fed
- Be aware that fatty fish, such as mackerel and tuna, have a shorter shelf life (4-6 months)
- Check freezers and refrigerators to verify proper temperatures. Freezers/cold storage **must** be maintained at a maximum temperature of 0 degrees F
- Examine the stored food and ask how food is stored and rotated to ensure that it maintains optimal nutritive value by minimizing freezer storage time and does not become freezer burned
- Check the catch date on boxes - old food loses nutritive value over time
- Verify frozen food has not thawed and refrozen or boxes damaged indicating possible contamination:
  - Check for water, blood, or ice pooling beneath or frozen to boxes, and

- Check for freezer burn which could affect palatability and moisture content of the food. Signs of freezer burn include white or desiccated flesh.
- Ask how food is thawed. Thawing **must** be conducted in a manner that minimizes contamination and will assure that the food retains nutritive value and wholesome quality until the time of feeding. When food is thawed in standing or running water, cold water **must** be used.
- Ask to see and examine a representative sample of thawed food to verify wholesomeness. Attention should be given to skin appearance, gill color, eye clarity, elasticity of the flesh, odor, and condition of viscera.
- Review the diet and amounts fed for each animal and ask how it is determined
- Review how calories/needs are calculated
- Review the feeding schedule/frequency
- Ask about supplementation and how it was determined. For example, cetaceans should have a multi-vitamin with B1 (Thiamine) at a minimum.
- Review daily food consumption records for each marine mammal
- All food **must** be fed to marine mammals within 24 hours once removed from freezers for thawing

## Water Quality

The water in the primary enclosures must **not** be detrimental to the health of the marine mammals. When inspecting pools, at a minimum, you should:

- Ensure that each pool is being monitored and tested
- Look at SOPs for water testing
- Ask about frequency of testing
- Who does testing/where performed? Is it In house or sent out to the lab?
- Review water quality data for preceding year for ALL pools
- Keep in mind that pools that are rectangular in shape or have a narrow passage into another pool should be monitored carefully because dead spaces may affect water quality
- If water is tested at an intake valve, the facility may also consider testing water taken from another area of the pool
- Daily testing:
  - pH must be tested daily:
    - A pH between 7.6 and 8.0 is ideal for marine mammal life support systems
    - Facilities with natural saltwater do **not** have to test for pH

- Water samples shall be taken and tested at least daily for chemical additives (*e.g.*, chlorine and copper) added to the water to maintain water quality standards
- Weekly testing:
  - Coliforms **must** be tested at least weekly
  - Coliforms with a consistent value of zero each week may be of concern
  - If coliforms exceeds 1000MPN/100 ml, action **must** be taken:
    - Two subsequent samples may be taken within 48 hours intervals and averaged with the first sample to obtain new count
    - If number still exceeds 1000MPN/100 ml then water is unacceptable **and** must be immediately corrected
    - Many facilities will do a partial to full water change to correct the problem
- Check Salinity levels:
  - Salinity should range from 15 - 36 PPT (parts per thousand):
    - Natural seawater salinity is 32 – 35 PPT
    - Salinity less than 20 PPT is likely to cause skin and eye pathology in cetaceans
    - Eye problems may be observed in pinnipeds housed in fresh or brackish water

## Shelter and Shade

All marine mammals kept outside **must** be provided with shelter to afford them protection from the weather and direct sunlight.

When inspecting the shelter provided, at a minimum, you should:

- Look carefully at each animal for eye damage which can be caused by inadequate shelter from direct sunlight and is a serious, painful health concern for both pinnipeds and cetaceans
- Look at supplements being given (Eye-Sea is a common supplement given to marine mammals with eye damage and/or to prevent damage)
- Check if any animals have zinc oxide on heads or back. If yes, they may be ill and may need additional shelter.
- Observe a training session. Ensure animals are **not** being asked to look into sun during feeding.
- If public feeding is allowed, then observe the activity to ensure that the animals are not forced to look directly into the sun while getting their food reward
- Shelters can be natural or artificial so long as they are appropriate for the

species concerned, when local climatic conditions are taken into consideration. For example, facilities may use moveable umbrellas to protect animals' eyes during training.

**Polar bears:** The dry resting and social activity area for polar bears **must** be provided with **enough shade** to accommodate all polar bears housed in the primary enclosure at the same time.

## Public Barriers

The requirements for public barriers are contained within section 3.101 (a)(2) under General Facilities and section 2.131(c)(1) under Handling:

- All marine mammals **must** be provided with protection from abuse and harassment by the viewing public by:
  - The use of a sufficient number of readily identifiable employees or attendants to supervise the viewing public, or
  - The use of physical barriers, or
  - A combination of these [3.101(a)(2)]
- During public exhibition, any animal **must** be handled so there is minimal risk of harm to the animal and to the public, **with sufficient distance and/or barriers** between the animals and the general viewing public so as to assure the safety of the animals and public [2.131 (c)(1)]

You should routinely observe public viewing areas to verify:

- If employees or attendants are used to protect marine mammals from abuse or harassment, then:
  - There are a sufficient number of uniformed or readily identifiable employees or attendants to supervise the viewing public, **and**
  - The attendants are adequately trained and attentive to the actions of the public
- The attendants are able to quickly respond to situations where the public potentially could have unsupervised contact with the animals:
  - Ask how the attendants would respond to any unsafe behaviors by the public. A common problem seen at marine mammal facilities involves the accidental or deliberate dropping of inedible items in the pool which can pose a serious health hazard if ingested.
- If physical barriers such as fences, walls, or glass partitions, are used, then they must be sufficient to protect the marine mammals from abuse and harassment by the viewing public and to assure the safety of the animals and the public
- If a combination of attendants and physical barriers are used, then they **must** effectively provide protection from abuse and harassment and assure the safety of both the marine mammals and the public

## Separation

Marine mammals known to be social in the wild **must** be housed with at least one compatible animal of same or biologically related species, except when the attending veterinarian, in consultation with the husbandry/training staff, determines that such housing is **not** in the best interest of the marine mammal's health or well-being.

When inspecting, at a minimum, you should:

- Check that social needs of the marine mammals are being addressed. If unsure, contact your SACS for guidance.
- Marine mammals housed together **must** be compatible and other animals housed near the marine mammals **must not** cause them unreasonable stress or discomfort or interfere with their good health
- For marine mammals housed separately, check for a written plan approved by attending veterinarian, and developed in consultation with husbandry/training staff, justifying the length of time of the separation and outlining the type and frequency of enrichment and interaction to be provided to the marine mammal

## Employees

A facility must have a sufficient number of adequately trained employees or attendants working in concert with the attending veterinarian to maintain the husbandry practices as required in the AWA Standards. Such practices **must** be under the supervision of a marine mammal caretaker with **demonstrable experience** in marine mammal husbandry and care.

When inspecting, at a minimum, you should:

- Review written documentation that the employees/attendants have successfully completed a facility training course which includes, but is not limited to:
  - Species appropriate husbandry techniques
  - Animal handling techniques
  - Proper reporting protocols on recordkeeping
  - Notifying veterinary staff of medical concerns
- Check that any training of marine mammals is being done by or under the direct supervision of experienced trainers
- Ensure that trainers or handlers meet professionally recognized standards for experience and training. If you are unsure, contact your SACS.
- Ask if they have an ongoing or periodic training program which incorporates industry standards and best practices

## Recordkeeping

Marine mammal facilities **must** maintain all records required under Subpart G-Records and any specific records required for marine mammals, such as:

- Medical records for individual animals
- Necropsy records
- Feeding records
- Water quality records

When inspecting records, at a minimum, you should:

- Review all of the required records and ensure they are being kept for 1 year (or 3 years for necropsy records)
- Contact National Policy Staff (NPS) if you need to obtain National Oceanic and Atmospheric Administration (NOAA) inventory data
- Verify the facility's inventory and cross reference with NOAA inventory

## Swim-with-the-dolphin (SWTD)/Interactive Programs

Section 3.111 Standards have been suspended.

## New License Fee Schedule Class A

### Review Sheet for Class "A" Fees

Use the sheet for the review of the information of your application and to determine your fees.

\*\*\*\*\*Please Reference Block 8 on your Application\*\*\*\*\*

#### Class "A" Breeder Only:

- 8A. Total Number of Animals Purchased:
  - Number of animals purchased in the next business Year.
- 8B. Total Number of Animals Sold:
  - Total number of animals to be sold in the next business Year.
- 8C. Gross Dollar Amount from the Sales of the Animals:
  - Gross dollar amount to be derived from the sale of the animals.
- 8D. Dollar Amount on which the Fee is based:
  - Fee is based off ½ the gross dollar amount listed in Block 8, Section C.
  - List the dollar amount the fee is based not the fee expected to be paid.

#### Example of Class "A" Block 8:

8. DEALERS ONLY - CLASS A OR CLASS B LICENSES MUST COMPLETE THIS BLOCK. (Class C Licenses go to Block 9)	
CLASS A (BREEDER) - LINE 'D' = ½ OF LINE 'C' CLASS B (DEALER) - LINE 'D' = LINE C LESS THE PURCHASE COST OF THE ANIMALS SOLD. (9 CFR Sections 2.6 and 2.7)	
A. ESTIMATE TOTAL NUMBER OF ANIMALS TO BE PURCHASED IN THE NEXT BUSINESS YEAR	0
B. ESTIMATE TOTAL NUMBER OF ANIMALS TO BE SOLD IN THE NEXT BUSINESS YEAR	42
C. ESTIMATE GROSS DOLLAR AMOUNT DERIVED FROM REGULATED ACTIVITIES (SALES, COMMISSIONS, ETC.)	\$ 4,000
D. ESTIMATE DOLLAR AMOUNT ON WHICH FEE IS BASED	\$ 2,000

#### Fee Schedule based off 8D Dollar Amount:

Dollar Amount- Listed in 8D	Fee Amount to be Paid
\$ 0 to \$ 500	\$30.00
\$ 501 to \$ 2,000	\$ 60.00
\$ 2,001 to \$ 10,000	\$ 120.00
\$10,001 to \$ 25,000	\$ 225.00
\$ 25,001 to \$ 50,000	\$ 350.00
\$ 50,001 to \$ 100,000	\$ 475.00
\$ 100,001... and up	\$ 750.00



## New License Fee Schedule Class B

### Review Sheet for Class "B" Fees

Use the sheet for the review of the information of your application and to determine your fees.

\*\*\*\*\*Please Reference Block 8 on your Application\*\*\*\*\*

#### Class "B" Dealer Only:

- 8A. Total Number of Animals Purchased:
- Number of animals purchased in the next business Year.
- 8B. Total Number of Animals Sold:
- Total number of animals to be sold in the next business Year.
- 8C. Gross Dollar Amount from the Sales of the Animals:
- Gross dollar amount to be derived from the sale of the animals.
- 8D. Dollar Amount on which the Fee is based:
- Fee is the Net dollar amount- Gross dollar amount minus the amount spent purchasing the animals listed in Block 8, Section A.
  - List the dollar amount the fee is based not the fee expected to be paid.

#### Example of Class "B" Block 8:

- The amount spent on the purchase of the animals would be \$2,500.

8. DEALER'S ONLY - CLASS A OR CLASS B LICENSES MUST COMPLETE THIS BLOCK. (Class C Licenses go to Block 9)	
CLASS A (BREEDER) - LINE "D" = 1/2 OF LINE "C" CLASS B (DEALER) - LINE "D" = LINE C LESS THE PURCHASE COST OF THE ANIMALS SOLD. (§ CFR Sections 2.6 and 2.7)	
A. ESTIMATE TOTAL NUMBER OF ANIMALS TO BE PURCHASED IN THE NEXT BUSINESS YEAR	10
B. ESTIMATE TOTAL NUMBER OF ANIMALS TO BE SOLD IN THE NEXT BUSINESS YEAR	42
C. ESTIMATE GROSS DOLLAR AMOUNT DERIVED FROM REGULATED ACTIVITIES (SALES, COMMISSIONS, ETC.)	\$ 6,000
D. ESTIMATE DOLLAR AMOUNT ON WHICH FEE IS BASED	\$ 3,500

#### Fee Schedule based off 8D Dollar Amount:

Dollar Amount- Listed in 8D	Fee Amount to be Paid
\$ 0 to \$ 500	\$30.00
\$ 501 to \$ 2,000	\$ 60.00
\$ 2,001 to \$ 10,000	\$ 120.00
\$10,001 to \$ 25,000	\$ 225.00
\$ 25,001 to \$ 50,000	\$ 350.00
\$ 50,001 to \$ 100,000	\$ 475.00
\$ 100,001... and up	\$ 750.00

Payments may be made by personal check, cashier's check, certified check, money order, or credit card.

## New License Fee Schedule Class C

### Review Sheet for Class "C" Fees

Use this sheet for the review of the information of your application and to determine your fees.

\*\*\*\*\*Please Reference Block 9 on your Application\*\*\*\*\*

#### Class "C" Exhibitor Only:

- The fee is based on the highest TOTAL number of animals on the inventory as of the date of the inspection passed.

Or

- List the largest number of Animals that you have held, owned, leased or exhibited during the previous business year.

#### Example of Class "C" Block 9:

9. EXHIBITORS ONLY - LIST THE LARGEST NUMBER OF ANIMALS THAT YOU HAVE HELD, OWNED, LEASED, OR EXHIBITED AT ANY ONE TIME DURING THE PREVIOUS BUSINESS YEAR. <small>(9 CFR Sections 2.0 and 2.7)</small>					
DOGS	1	NONHUMAN PRIMATES	1	RODENTS <small>(Do not include lab rats or mice)</small>	0
CATS	3	MARINE MAMMALS	0	WILD/EXOTIC HOOFSTOCK	2
GUINEA PIGS	0	FARM ANIMALS	6	BEARS	0
HAMSTERS	0	WILD/EXOTIC CANINES	1	WILD/EXOTIC MAMMALS <small>(Not listed elsewhere)</small>	3
RABBITS	1	WILD/EXOTIC FELINES	0	TOTAL <small>(All animals listed in Block 9)</small>	18

#### Fee Schedule based off the total number of Animals listed In Block 9:

Total Number of Animals:	Fee amount to be paid:
1 to 5	\$ 30.00
6 to 25	\$ 75.00
26 to 50	\$ 175.00
51 to 500	\$ 225.00
501... and up	\$ 300.00

Payments may be made by personal check, cashier's check, certified check, money order, or credit card.

## Optimal Hours Form Letter



United States Department of Agriculture

**Animal and Plant  
Health Inspection  
Service**  
  
4700 River Road  
Riverdale, MD 20737

DATE

Name  
Address  
Address

Dear *(Name)*

The inspection process is fundamental to ensuring the well-being of all animals regulated under the Animal Welfare Act. As a courtesy to persons licensed or registered under the Animal Welfare Act, we allow the licensee or registrant to identify optimal hours during only a few weekdays, as opposed to all five, during which we make every effort to conduct our unannounced inspections. Although we provide this courtesy, we retain the authority to inspect at any time during business hours. These "business hours" are defined in the regulations as a reasonable number of hours between 7 a.m. and 7 p.m., Monday through Friday.

The hours that you requested (          list hours here          ) are not considered sufficient to facilitate unannounced inspections. Current agency guidance states optimal hours for inspection should be at least four hour blocks of time during daylight hours 3 days per week. Alternative arrangements may be accepted by inspectors if they feel that it will adequately facilitate unannounced inspections. Until such time as you designate appropriate optimal hours for inspection, APHIS Officials will continue to inspect during regular business hours.

We recognize that depending on your circumstances, it may be difficult to arrange consistent times of availability during those hours, therefore, you may also elect to designate an alternative authorized person if there is someone else that is able to facilitate inspection in the event that you are not available.

If you do **not** designate hours of inspection or an alternative authorized person and no one is available when we arrive to conduct an inspection during regular business hours, this will be cited as an attempted inspection. In accordance with current agency guidance, we will call any phone number(s) provided by you and wait for up to 30 minutes. If you or an authorized person can be at the facility within that time we will wait and conduct the inspection when you arrive. If no one can be contacted within 30 minutes, or no authorized person is available, your unavailability will be documented as an attempted inspection.

If you do provide appropriate optimal hours of inspection, then you will only be cited for an attempted inspection if no one is available during these designated hours.

If you have any questions or would like to discuss or establish appropriate optimal hours, please contact me at *(your cell phone number)*.

Sincerely,

Your Name Here  
Your Title Here  
USDA, APHIS, Animal Care

Cc: file

An Equal Opportunity Provider and Employer

## Options for Identification of Dogs and Cats



### USDA-APHIS-Animal Care



### Options for Identification of Dogs & Cats

TAGS: The tags must contain the following information: USDA# (48-A-0000) & Individual # (personal ID #: 1, 27, 32, etc.)

NOTE: Tags **MUST** include the letters USDA

MICROCHIPS: The microchip implants must be placed in a standard anatomical location and the licensee/registrant must have an appropriate microchip scanner device available to USDA APHIS officials.

Tattoo: The tattoo letters will be issued by this office after a written request from the licensee.

#### **ID TAGS**

##### **Metal:**

Ketchum Mfg. Co.  
11 Town Shed Rd.  
Lake Luzerne, NY 12846  
(800)222-0460  
<http://www.ketchummfg.com>

Nat'l Band & Tag Co.  
721 York St.  
New Port, KY 41072  
(859)261-2035  
<http://www.nationalband.com>

The Keyes- Davis Co.  
P.O. Box 1557  
Battle Creek, MI 49015  
(269)962-7505  
<http://www.keyesdavis.com>

##### **Plastic:**

Nat'l Band & Tag Co.  
721 York St.  
New Port, KY 41072  
(859)261-2035  
<http://www.nationalband.com>

##### **Microchips:**

AVID ID Systems  
3185 Hammer Ave.  
Norco, CA 92860  
(800)371-7505  
<http://avidid.com>

Home-Again  
5580 Centerview Drive  
Raleigh, NC 27606  
(888)466-3242 (1-888-  
HOMEAGAIN)  
<https://www.homeagain.com>

Revival Animal Health Inc.  
P.O. Box 200  
Orange City, IA 51041-0200  
(800)786-4751  
<https://www.revivalanimal.com/>

USDA does NOT endorse the specific companies listed here.  
Many other companies supply tags and microchips that will comply with USDA standards.

## Personally Identifiable Information (PII) Examples

Personally Identifiable Information (PII) is information that can be used to uniquely identify an individual. The following are some examples of data which when combined with an individual's name constitute PII. For a decision on other data elements not indicated on this list, contact the USDA Chief Privacy Officer. Examples include:

- Bank account numbers
- Biometric record (such as fingerprint, iris scan, DNA)
- Date of birth
- Credit card numbers
- Criminal history
- Employment information to include ratings, disciplinary actions, performance elements and standards
- Financial information
- Medical history information (including medical conditions and metric information, *e.g.* weight, height, blood pressure)
- Mother's maiden name
- Place of birth
- Security clearance history or related information (not including actual clearances held)
- Social security number

The identification of PII requires an analysis of material in context.<sup>1</sup>

The following examples, taken alone, would generally not constitute PII. Please consult the USDA Chief Privacy Officer for additional guidance.



- Academic information (credentials, areas of study)
- An individual's name
- Digital pictures
- EIN/TIN as a business identifier
- Email addresses (work and personal)
- Employee present and past grades (and salary privacy)<sup>2</sup>
- Employee present and past position titles and occupational series<sup>2</sup>
- Phone numbers (work, home, cell)
- Resumes, unless they include a SSN
- Security clearances held
- Street addresses (work and personal)
- Written biographies (like the ones used in pamphlets or speakers)

<sup>1</sup> OMB's Memorandum, M-07-16 (of May 22, 2007, "Safeguarding and Responding to the Breach of Personally Identifiable Information") requires an analysis of PII in context: "For example, an office rolodex contains personally identifiable information (name, phone number, etc.). In this context the information probably would not be considered sensitive; however, the same information in a database of patients at a clinic which treats contagious disease probably would be considered sensitive information. Similarly, using a best judgment standard, discarding a document with the author's name on the front (and no other personally identifiable information) into an office trashcan likely would not warrant notification to US-CERT.

<sup>2</sup> OPM Regulation, 5 C.F.R. § 293.311 states that the following information “about most present and former Federal employees, is available to the public: (1) Name; (2) Present and past position titles and occupational series; (3) Present and past grades; (4) Present and past annual salary rates ... (5) Present and past duty stations; and (6) Position descriptions, identification of job elements, and those performance standards (but not actual performance appraisals) that the release of which would not interfere with law enforcement programs or severely inhibit agency effectiveness...”

## Search for Unlicensed Activity Worksheet

(For APHIS Internal Use Only)

		<b>USDA, APHIS, Animal Care</b>			
<b>SEARCH FOR UNLICENSED ACTIVITY</b>					
Search Conducted by _____			Date Conducted _____		
Name of Establishment _____			Customer No. if applicable _____		
Person Contacted _____					
Address _____					
City _____	State _____	Zip _____	Phone No _____		
Reason for search _____					
Regulated activity verified Yes <input type="checkbox"/> No <input type="checkbox"/>		Non-compliances present Yes <input type="checkbox"/> No <input type="checkbox"/>		Inspection Report done? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Application packet and information provided? Yes <input type="checkbox"/> No <input type="checkbox"/>					
<b>Details of Search:</b>					
INSPECTOR _____			DATE _____		
REVIEWED BY _____			DATE _____		

## State and Territory Identification Codes

Alphabetical List		Postal Code	Numerical	Order List
64	ALABAMA	AL	11	MAINE
96	ALASKA	AK	12	NEW HAMPSHIRE
86	ARIZONA	AZ	13	VERMONT
71	ARKANSAS	AR	14	MASSACHUSETTS
93	CALIFORNIA	CA	15	RHODE ISLAND
84	COLORADO	CO	16	CONNECTICUT
16	CONNECTICUT	CT	21	NEW YORK
50	DELAWARE	DE	22	NEW JERSEY
58	FLORIDA	FL	23	PENNSYLVANIA
67	GEORGIA	GA	31	OHIO
97	GUAM	GU	32	INDIANA
95	HAWAII	HI	33	ILLINOIS
82	IDAHO	ID	34	MICHIGAN
33	ILLINOIS	IL	35	WISCONSIN
32	INDIANA	IN	41	MINNESOTA
42	IOWA	IA	42	IOWA
48	KANSAS	KS	43	MISSOURI
61	KENTUCKY	KY	45	NORTH DAKOTA
72	LOUISIANA	LA	46	SOUTH DAKOTA
11	MAINE	ME	47	NEBRASKA
69	MARIANA ISLANDS	MP	48	KANSAS
51	MARYLAND	MD	50	DELAWARE
14	MASSACHUSETTS	MA	51	MARYLAND
34	MICHIGAN	MI	52	VIRGINIA
41	MINNESOTA	MN	54	WEST VIRGNIA
65	MISSISSIPPI	MS	55	NORTH CAROLINA
43	MISSOURI	MO	56	SOUTH CAROLINA
81	MONTANA	MT	57	GEORGIA
47	NEBRASKA	NE	58	FLORIDA
88	NEVADA	NV	61	KENTUCKY
12	NEW HAMSHIRE	NH	63	TENNESSEE
22	NEW JERSEY	NH	64	ALABAMA
85	NEW MEXICO	NM	65	MISSISSIPPI
21	NEW YORK	NY	69	MARIANA ISLANDS
55	NORTH CAROLINA	NC	71	ARKANSAS
45	NORTH DAKOTA	ND	72	LOUISIANA
31	OHIO	OH	73	OKLAHOMA
73	OKLAHOMA	OK	74	TEXAS
92	OREGON	OR	81	MONTANA
23	PENNSYLVANIA	P	82	IDAHO
94	PUERTO RICO	PR	83	WYOMING
15	RHODE ISLAND	RI	84	COLORADO
56	SOUTH CAROLINA	SC	85	NEW MEXICO
46	SOUTH DAKOTA	SD	86	ARIZONA
63	TENNESSEE	TN	87	UTAH
74	TEXAS	TX	88	NEVADA
87	UTAH	UT	91	WASHINGTON
13	VERMONT -	VT	92	OREGON
52	VIRGINIA	VA	93	CALIFORNIA
91	WASHINGTON	WA	94	PUERTO RICO
54	WEST VIRGINIA	WV	95	HAWAII
35	WISCONSIN	WI	96	ALASKA
83	WYOMING	WY	97	GUAM



## Teachable Moments Review Checklist

### FOR APHIS INTERNAL USE

### Teachable Moment Review Checklist

May 31, 2016

Documents needed to review a TM:

- The corresponding inspection report
- The previous IR and TM
- Enforcement History

**When reviewing Teachable Moments (TM), the reviewer should ensure that the use of the TM was appropriate, using the following criteria:**

**Facilities which are not appropriate for the use of the TM:**

- Prelicense or New Site Addition
- Poor compliance record
- Under investigation or have a current case at OGC
- History of refusal of inspection or interference

**NCIs which are not appropriate for the use of the TM:**

- Impacting animal welfare
- Direct or critical
- Could soon become direct or critical
- Previous TM or citation
- Same section is being cited on the inspection report
- Item may actually be in compliance

**If any of the following TM apply to a Research Facility or contains a red flag, it should be reviewed carefully by the Supervisor or referred to the Supervisor:**

- Veterinary Care
- Handling
- Space

**The TM is not documented appropriately if:**

- 4 or more TMs are noted, possibly too many
- Section # is incorrect
- Narrative contains excessive detail\*
- No narrative or insufficient detail\*
- Reviewer is unable to determine if TM is appropriate and needs more information

Example TM Narrative

3.1 (c) Not enough detail: dirty den boxes / carpet strings

Too much detail: 2 pens in the Yorkie area in the top barn (# 3 and 4) have mild staining around the den box opening and should be cleaned more frequently. In 2 pens in the whelping area, # 6 and 8, housing 2 litters of poodles, there are carpet strings /

Page 1 of 2

**FOR APHIS INTERNAL USE**

**Teachable Moment Review Checklist**

May 31, 2016

excessive wear on 25% of each carpet. The owner did not want to disturb the new mother for the last couple days but has a plan to replace the whelping carpets with the pups tomorrow.

Appropriate detail: 2 pens have staining at dog door (need more frequent cleaning) & 2 whelping boxes with worn carpets need carpets replaced.

If any of the above criteria are noted by the non-Supervisor reviewer, the TM form should refer to the Supervisor. Supervisors will contact the inspector to discuss the TM.

# Appendix B. Direct Noncompliance Item (NCI) Guidance (9 CFR Parts 2-3)

## Direct NCI Guidance

9 CFR Section Number	Example of Direct NCI
<p><b>Section 2.40</b>                      Attending Veterinarian and Adequate Veterinary Care  <b>NOTE:</b> If a licensee or registrant can demonstrate via records or other means that he/she has taken the proper steps to mitigate the injury and/or death of the animal, a noncompliance has <b>not</b> occurred.                      These proper steps include, but are <b>not</b> limited to:</p> <ol style="list-style-type: none"> <li>1. Identifying the condition requiring veterinary care in a timely manner;</li> <li>2. Acquiring veterinary care and/or initiating treatment in a timely manner; and/or</li> <li>3. Following the treatment instructions of the Attending Veterinarian.</li> </ol>	<p>Cherry eye, eye opacity or enlarged eye globe with inflammation and abnormal discharge</p> <p>Overgrown toenails causing mal-positioned digits or embedded in pad causing open lesions or gait problems</p> <p>Heavy tick/flea infestation (<i>i.e.</i>, a high number of external parasites are visible) with associated lethargy, pale mucous membranes, labored breathing</p> <p>Fly bite ears with associated inflammation, discharge, scratching, hematoma</p> <p>Stools that are loose, bloody associated with emaciated and/or lethargic dog</p> <p>Ongoing respiratory condition with severe cough and/or abnormal nasal discharge</p> <p>Presence of contagious disease, such as Parvovirus infection, and <b>no</b> isolation area to seclude the affected dogs from the rest of the kennel</p> <p>Any untreated, prolapsed, open lesion/wound where the skin is pulled back to expose underlying tissue, muscle, bone</p> <p>Severe ear infection with scratching and rubbing of ears, plus an associated moist ear canal discharge, inflammation, or ear hematoma</p> <p>Interdigital cysts with discharge, inflammation, and lameness</p>

9 CFR Section Number	Example of Direct NCI
<p><b>Section 2.129(a) and (b)</b> Confiscation and Destruction of Animals</p>	<p>A confiscation would be the result of a situation that involved animal suffering due to AWA noncompliances and would therefore be considered a Direct NCI; this would typically be cited in the associated sections (veterinary care, feeding, shelter, etc.), but if 2.129 is cited, it is a direct NCI.</p>
<p><b>Section 2.130</b> Minimum Age Requirements</p>	<p>Transportation of a dog or cat that has <b>not</b> been weaned, <b>without</b> their dam or queen, and <b>without</b> appropriate variances or exceptions (if required)</p>
<p><b>Section 2.131</b> Handling of Animals</p>	<p>Death or severe injury to animal as a result of handling procedures; also behavioral stress due to handling noncompliances</p> <p>Use of items that cause physical injury, harm, or distress to the animals, such as the excessive use of the ankus, hot shot, or any tool used to train or work the animal</p> <p>Public exhibition that allows direct contact of a dangerous animal (big cat, bear, wolves, elephant, great ape, etc.) with the general public <b>without</b> sufficient or adequate barriers, such as use of a juvenile or adult big cat in photo shoots, elephant rides <b>without</b> an attendant</p> <p>Use of tranquilizers to facilitate public handling of animals</p> <p>Failure to provide appropriate measures to alleviate any climatic weather condition that is a threat to the health and welfare of the animal, such as failing to provide sufficient heating or cooling to an animal barn or housing facility, when conditions and the species of the animal require it for the health and welfare of the animal</p> <p>Exhibition/performance of an animal that would be detrimental to its health or well-being, such as an immature/young animal that is handled excessively by the public in a petting zoo and is unable to get away from the public, or baby tigers used for photo shoots with excessive public handling showing distress</p> <p>Facility that obtains a dangerous animal <b>without</b> having a person knowledgeable and experienced about the species on staff</p>
<p><b>Section 3.1(a)</b> Housing Facilities General</p>	<p>Structure deterioration, such as rusted support posts, where the structure is in danger of falling on dogs</p> <p>Facilities <b>not</b> maintained; animals escape</p>
<p><b>Section 3.1(b)</b> Housing Facilities General</p>	<p>Live electric wire exposed to and within easy reach of dogs (insulation removed and/or bare ends of cord exposed)</p>

9 CFR Section Number	Example of Direct NCI
<p><b>Sections 3.2(a), 3.3(a), 3.5(a)</b></p> <p>Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities</p>	<p>Temperature outside of allowable ranges, animal showing signs of distress</p> <p>Temperature below allowable lower ranges; dry bedding or other methods of conserving body heat <b>not</b> present</p>
<p><b>Sections 3.2(b), 3.3(b), 3.5(b)</b></p> <p>Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities</p>	<p>Lack of ventilation to the point where there are noxious fumes (<i>e.g.</i>, your eyes burn) at the level of the animal's eyes and nose; dogs are showing signs of discomfort and/or distress, such as squinting, coughing, sneezing, nasal discharge, etc.</p>
<p><b>Sections 3.2(c), 3.3(c), 3.5(c)</b></p> <p>Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities</p>	<p>Absence of lighting and absence of diurnal cycle (<b>no</b> windows and <b>no</b> broad spectrum lighting with appropriate cycling of light and dark)</p>
<p><b>Sections 3.3(d), 3.4(b)</b></p> <p>Sheltered Housing Facilities, Outdoor Housing Facilities</p>	<p>Sheltered area <b>not</b> large enough for all dogs to sit, stand, lie in a normal manner, and to turn about freely, and temperature under 45 °F or over 85 °F; dogs showing signs of discomfort and/or distress</p>
<p><b>Section 3.4(a)</b></p> <p>Outdoor Housing Facilities</p>	<p>Dogs and cats maintained in areas in which they are <b>not</b> acclimated to the temperatures prevalent in the area, and/or breeds of dogs and cats maintained in areas in which they <b>cannot</b> tolerate the prevalent temperatures <b>without</b> stress</p>
<p><b>Section 3.4(b)</b></p> <p>Outdoor Housing Facilities</p>	<p>Shelter <b>without</b> sufficient bedding and temperature under 35 °F, or between 35 and 50 °F with dogs showing signs of discomfort (shivering)</p> <p>Insufficient wind/rain break and temperature under 50 °F; water in shelter with wet dogs</p>
<p><b>Section 3.6(a)(1)</b></p> <p>Primary Enclosure</p>	<p>Enclosure <b>not</b> designed to enable dogs to remain dry, wet dogs, temperature under 45 °F</p> <p>Food situation where one dog does <b>not</b> let other dog(s) eat and there are signs of distress and/or emaciation</p>
<p><b>Section 3.6(c)(1)</b></p> <p>Primary Enclosure</p>	<p>Enclosure does <b>not</b> meet minimum floor space requirements and dog has behavioral and/or medical issues (example: lick granuloma)</p>

9 CFR Section Number	Example of Direct NCI
<b>Section 3.7</b> Compatible Grouping	Incompatible dogs housed together with injuries and/or signs of distress
<b>Section 3.8</b> Exercise	Insufficient floor space and <b>no</b> opportunity for exercise ( <b>no</b> written plan, <b>no</b> evidence of exercise area)
<b>Section 3.9(a)</b> Feeding	Food contaminated with feces, urine, mold, mildew, pest waste Emaciated dogs with <b>no</b> feed or inappropriate feed
<b>Section 3.10</b> Watering	<b>No</b> water or frozen water—dogs offered fresh water and drink voraciously and/ or in a manner that demonstrates they are extremely thirsty  Water contaminated with feces, urine, pest waste, mud
<b>Section 3.11(a)</b> Cleaning	Accumulation of excreta and food waste in the primary enclosure; animals have excreta and/or food waste on their fur, and/or <b>cannot</b> find adequate areas in their enclosure where they can stand or walk <b>without</b> being in waste  Excessive feces and food waste are attracting an accumulation of pests (flies/ mosquitoes)
<b>Section 3.11(b)(3)</b> Sanitation	Using cold water <b>without</b> a disinfectant or detergent, and animals are getting ill from a contagious disease.
<b>Section 3.11(c)</b> Housekeeping	Weeds/brush are growing up and around dog pens. Vermin are seen in the dog pens, eating/defecating and/or getting into the food supply.  Holes large enough to allow dogs to escape or other animals to enter, covered by the brush.
<b>Section 3.11(d)</b> Pest Control	The presence of pests with signs of infestation such as contaminated feed, contaminated water, intense odor, fly strike, and little or <b>no</b> pest control in place
<b>Section 3.12</b> Employees	The lack of an adequate number of employees; numerous Repeat and/or Direct noncompliances identified on the inspection
<b>Sections 3.13(a)(b)(c)</b> Consignments to Carriers and IH	A carrier/IH accepts an animal more than 4 hours before the scheduled flight departure, and there was <b>no</b> documentation as to when the animal was last fed or watered; and the animal either voraciously goes for food/water when offered, or it becomes ill and needs veterinary attention, or dies.
<b>Section 3.13(d)</b> Consignments to Carriers and IH	Carrier/IH accepts dog for transport in an inadequate primary enclosure; dog breaks out of the transport enclosure and is lost, injured, or killed.

9 CFR Section Number	Example of Direct NCI
<p><b>Section 3.13(f)</b> Consignments to Carriers and IH</p>	<p><b>No</b> documentation is made that the consignee was notified when the shipment arrived, nor every 6 hours thereafter. The animal becomes ill due to the delay in notifying the consignee.</p>
<p><b>Section 3.14(a)</b> Primary Enclosure Used to Transport Live Dogs and Cats</p>	<p>Animal was able to escape the transport enclosure. Emergency presented itself and the animal enclosure could <b>not</b> be moved in a timely manner. Limbs protruding from the enclosure. <b>Not</b> enough ventilation openings on the enclosure. All resulting in injury, distress, or death.</p>
<p><b>Section 3.14(c)</b> Primary Enclosure Used to Transport Live Dogs and Cats</p>	<p>The transport enclosure does <b>not</b> meet the ventilation requirements.</p>
<p><b>Section 3.14(d)</b> Primary Enclosure Used to Transport Live Dogs and Cats</p>	<p>A large puppy or dog is put into a transport enclosure with a small puppy or dog, and the smaller dog is seriously injured or dies. There is a disregard for the 20 pound rule. An overly aggressive dog is shipped with another dog and the submissive dog is seriously injured or killed.</p>
<p><b>Section 3.15(a-h)</b> Primary Conveyances</p>	<p>Primary conveyance is structurally unsound—exhaust fumes enter the cargo space and/or air flow is hindered, and/or animals are exposed to too cold or too hot temperatures, and/or dry ice is in the cargo space, etc. The result is injury, distress, or death.</p>
<p><b>Section 3.16</b> Food and Water Requirements</p>	<p>Animals are transported for more than 12 hours and are <b>not</b> fed or offered water (if under 16 weeks), and are now in distress and/or dehydrated and/or needing veterinary care and/or die.</p>
<p><b>Section 3.17(a)</b> Care in Transit</p>	<p>Animals are either in a truck or in a plane, and are <b>not</b> observed every 4 hours (if applicable), and the animals become severely ill, injured, distressed, and/or die.</p>
<p><b>Section 3.17(c)</b> Care in Transit</p>	<p>Animal is obviously ill, injured, or in physical distress, but is transported anyway.</p>
<p><b>Section 3.17(d)</b> Care in Transit</p>	<p>Animal is removed from the transport enclosure resulting in injury, escape, and/ or death.</p>
<p><b>Section 3.18(c)</b> Terminal Facilities</p>	<p>Lack of ventilation to the point where there are noxious fumes (<i>e.g.</i>, your eyes burn) at the level of the animal's eyes and nose; dogs are showing signs of discomfort and/or distress.</p>

9 CFR Section Number	Example of Direct NCI
<b>Section 3.18(d)</b> Terminal Facilities	Temperatures are allowed to fall below 45 °F or above 85 °F, which results in the animals showing signs of discomfort, distress, or death.
<b>Section 3.18(c)</b> Terminal Facilities	Animals are <b>not</b> provided shelter to extreme elements, which results in the animals being injured, or showing signs of discomfort, distress, or death.
<b>Section 3.19(a)</b> Handling	When moving animals from the terminal facility to plane side, the animals were exposed to prolonged time out in the sun, extreme heat, rain, snow, or extreme cold, and now show signs of injury, discomfort, distress, or death.
<b>Section 3.19(b)</b> Handling	A transport enclosure is put on an unattended conveyor belt, or is haphazardly put onto an unattended belt and the enclosure falls off.
<b>Section 3.1(a)</b> Housing Facilities General	Structure deterioration, such as rusted support posts, where the structure is in danger of falling on dogs Facilities <b>not</b> maintained; animals escape
<b>Section 3.1(b)</b> Housing Facilities General	Live electric wire exposed to and within easy reach of dogs (insulation removed and/or bare ends of cord exposed)
<b>Sections 3.2(a), 3.3(a), 3.5(a)</b> Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities	Temperature outside of allowable ranges, animal showing signs of distress Temperature below allowable lower ranges; dry bedding or other methods of conserving body heat <b>not</b> present
<b>Sections 3.2(b), 3.3(b), 3.5(b)</b> Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities	Lack of ventilation to the point where there are noxious fumes ( <i>e.g.</i> , your eyes burn) at the level of the animal's eyes and nose; dogs are showing signs of discomfort and/or distress, such as squinting, coughing, sneezing, nasal discharge, etc.
<b>Sections 3.2(c), 3.3(c), 3.5(c)</b> Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities	Absence of lighting and absence of diurnal cycle ( <b>no</b> windows and <b>no</b> broad spectrum lighting with appropriate cycling of light and dark)
<b>Sections 3.3(d), 3.4(b)</b> Sheltered Housing Facilities, Outdoor Housing Facilities	Sheltered area <b>not</b> large enough for all dogs to sit, stand, lie in a normal manner, and to turn about freely, and temperature under 45 °F or over 85 °F; dogs showing signs of discomfort and/or distress



9 CFR Section Number	Example of Direct NCI
<b>Section 3.4(a)</b> Outdoor Housing Facilities	Dogs and cats maintained in areas in which they are <b>not</b> acclimated to the temperatures prevalent in the area, and/or breeds of dogs and cats maintained in areas in which they <b>cannot</b> tolerate the prevalent temperatures <b>without</b> stress
<b>Section 3.4(b)</b> Outdoor Housing Facilities	Shelter <b>without</b> sufficient bedding and temperature under 35 °F, or between 35 and 50 °F with dogs showing signs of discomfort (shivering) Insufficient wind/rain break and temperature under 50 °F; water in shelter with wet dogs
<b>Section 3.6(a)(1)</b> Primary Enclosure	Enclosure <b>not</b> designed to enable dogs to remain dry, wet dogs, temperature under 45 °F Food situation where one dog does <b>not</b> let other dog(s) eat and there are signs of distress and/or emaciation
<b>Section 3.6(c)(1)</b> Primary Enclosure	Enclosure does <b>not</b> meet minimum floor space requirements and dog has behavioral and/or medical issues (example: lick granuloma)
<b>Section 3.7</b> Compatible Grouping	Incompatible dogs housed together with injuries and/or signs of distress
<b>Section 3.8</b> Exercise	Insufficient floor space and <b>no</b> opportunity for exercise ( <b>no</b> written plan, <b>no</b> evidence of exercise area)
<b>Section 3.9(a)</b> Feeding	Food contaminated with feces, urine, mold, mildew, pest waste Emaciated dogs with <b>no</b> feed or inappropriate feed
<b>Section 3.10</b> Watering	<b>No</b> water or frozen water—dogs offered fresh water and drink voraciously and/ or in a manner that demonstrates they are extremely thirsty Water contaminated with feces, urine, pest waste, mud
<b>Section 3.11(a)</b> Cleaning	Accumulation of excreta and food waste in the primary enclosure; animals have excreta and/or food waste on their fur, and/or <b>cannot</b> find adequate areas in their enclosure where they can stand or walk <b>without</b> being in waste Excessive feces and food waste are attracting an accumulation of pests (flies/ mosquitoes)
<b>Section 3.11(b)(3)</b> Sanitation	Using cold water <b>without</b> a disinfectant or detergent, and animals are getting ill from a contagious disease.

9 CFR Section Number	Example of Direct NCI
<p><b>Section 3.11(c)</b> Housekeeping</p>	<p>Weeds/brush are growing up and around dog pens. Vermin are seen in the dog pens, eating/defecating and/or getting into the food supply.</p> <p>Holes large enough to allow dogs to escape or other animals to enter, covered by the brush.</p>
<p><b>Section 3.11(d)</b> Pest Control</p>	<p>The presence of pests with signs of infestation such as contaminated feed, contaminated water, intense odor, fly strike, and little or <b>no</b> pest control in place</p>
<p><b>Section 3.12</b> Employees</p>	<p>The lack of an adequate number of employees; numerous Repeat and/or Direct noncompliances identified on the inspection</p>
<p><b>Sections 3.13(a)(b)(c)</b> Consignments to Carriers and IH</p>	<p>A carrier/IH accepts an animal more than 4 hours before the scheduled flight departure, and there was <b>no</b> documentation as to when the animal was last fed or watered; and the animal either voraciously goes for food/water when offered, or it becomes ill and needs veterinary attention, or dies.</p>
<p><b>Section 3.13(d)</b> Consignments to Carriers and IH</p>	<p>Carrier/IH accepts dog for transport in an inadequate primary enclosure; dog breaks out of the transport enclosure and is lost, injured, or killed.</p>
<p><b>Section 3.13(f)</b> Consignments to Carriers and IH</p>	<p><b>No</b> documentation is made that the consignee was notified when the shipment arrived, nor every 6 hours thereafter. The animal becomes ill due to the delay in notifying the consignee.</p>
<p><b>Section 3.14(a)</b> Primary Enclosure Used to Transport Live Dogs and Cats</p>	<ol style="list-style-type: none"> <li>1. Animal was able to escape the transport enclosure.</li> <li>2. Emergency presented itself and the animal enclosure could <b>not</b> be moved in a timely manner.</li> <li>3. Limbs protruding from the enclosure.</li> <li>4. <b>Not</b> enough ventilation openings on the enclosure.</li> </ol> <p>All resulting in injury, distress, or death.</p>
<p><b>Section 3.14(c)</b> Primary Enclosure Used to Transport Live Dogs and Cats</p>	<p>The transport enclosure does <b>not</b> meet the ventilation requirements.</p>
<p><b>Section 3.14(d)</b> Primary Enclosure Used to Transport Live Dogs and Cats</p>	<p>A large puppy or dog is put into a transport enclosure with a small puppy or dog, and the smaller dog is seriously injured or dies. There is a disregard for the 20 pound rule.</p> <p>An overly aggressive dog is shipped with another dog and the submissive dog is seriously injured or killed.</p>

9 CFR Section Number	Example of Direct NCI
<b>Section 3.15(a-h)</b> Primary Conveyances	Primary conveyance is structurally unsound—exhaust fumes enter the cargo space and/or air flow is hindered, and/or animals are exposed to too cold or too hot temperatures, and/or dry ice is in the cargo space, etc. The result is injury, distress, or death.
<b>Section 3.16</b> Food and Water Requirements	Animals are transported for more than 12 hours and are <b>not</b> fed or offered water (if under 16 weeks), and are now in distress and/or dehydrated and/or needing veterinary care and/or die.
<b>Section 3.17(a)</b> Care in Transit	Animals are either in a truck or in a plane, and are <b>not</b> observed every 4 hours (if applicable), and the animals become severely ill, injured, distressed, and/or die.
<b>Section 3.17(c)</b> Care in Transit	Animal is obviously ill, injured, or in physical distress, but is transported anyway.
<b>Section 3.17(d)</b> Care in Transit	Animal is removed from the transport enclosure resulting in injury, escape, and/ or death.
<b>Section 3.18(c)</b> Terminal Facilities	Lack of ventilation to the point where there are noxious fumes ( <i>e.g.</i> , your eyes burn) at the level of the animal’s eyes and nose; dogs are showing signs of discomfort and/or distress.
<b>Section 3.18(d)</b> Terminal Facilities	Temperatures are allowed to fall below 45 °F or above 85 °F, which results in the animals showing signs of discomfort, distress, or death.
<b>Section 3.18(c)</b> Terminal Facilities	Animals are <b>not</b> provided shelter to extreme elements, which results in the animals being injured, or showing signs of discomfort, distress, or death.
<b>Section 3.19(a)</b> Handling	When moving animals from the terminal facility to plane side, the animals were exposed to prolonged time out in the sun, extreme heat, rain, snow, or extreme cold, and now show signs of injury, discomfort, distress, or death.
<b>Section 3.19(b)</b> Handling	A transport enclosure is put on an unattended conveyor belt, or is haphazardly put onto an unattended belt and the enclosure falls off.

This information is current to 9 Sept 2010.



# Appendix C. Equipment and Supplies

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## Equipment

The following equipment is required:

- Camera/video camera, memory card, and extra batteries
- Cellular phone
- First-aid kit
- Laptop computer
- Official identification (badge and LincPass)
- Printer and paper
- Portable memory card reader
- MiFi / Jetpack

The following equipment is highly recommended:

- Blank Inspection Report forms (in case of computer/printer failure)
- Business cards
- Coveralls, preferably disposable
- Disposable boots
- Extra printer cartridge
- Flashlight and extra batteries
- GPS and/or maps
- Hearing Protection
- Kestrel Weather Meter
- Note pad
- Pen/pencil

- Raytek MiniTemp Thermometer
- Reference material, such as:
  - Subpart A – Animal Welfare
  - Required Inspection Procedures
  - Reference texts
- Soap/disinfectant/hand sanitizer
- Tape measure

The following items are optional:

- Binoculars
- Calculator
- Hand counter
- Inspection checklists
- Towels/paper towels

## Special Equipment

### Nonhuman Primates

The following equipment is recommended for inspecting facilities with **macaques**, if within 5 feet of the macaques:

- Biological waste bag
- Coveralls – preferably disposable
- Disinfectant
- Disposable gloves
- Monkey Bite/Scratch Kit
- Full face shield and eye protection, such as safety glasses or goggles
- Respirator

The following equipment is recommended for inspecting facilities with other nonhuman primates:

- Respirator – Level N95, or better

### Other Animals

The following equipment is recommended for inspecting elephants:

- Respirator – Level N95, or better

**NOTICE**

To wear a respirator, you **must** meet the APHIS Respirator Program requirements, *i.e.*, medical clearance and fit testing.

## Supplies

The following forms and information should be available for distribution to the facility and general public by the inspector:

- [The Animal Welfare Act](#)
- [AWA Regulations and Standards \(Blue Book\)](#)
- APHIS Fact Sheets and Tech Notes
- APHIS Forms for record keeping:
  - [APHIS Form 7002–Program of Veterinary Care](#)
  - [APHIS Form 7005–Record of Acquisition of Dogs and Cats on Hand](#)
  - [APHIS Form 7006–Record of Disposition of Dogs and Cats](#)
  - [APHIS Form 7006A–Continuation Sheet for Record of Disposition of Dogs and Cats](#)
  - [APHIS Form 7019–Record of Animals on Hand \(Other than Dogs and Cats\)](#)
  - [APHIS Form 7020–Record of Acquisition, Disposition or Transport of Animals \(Other Than Dogs and Cats\)](#)
  - [APHIS Form 7020A–Continuation Sheet for Record of Acquisition, Disposition, or Transport of Animals \(Other than Dogs and Cats\)](#)
  - [Dog Breeder Resource Guide](#)
- [Options for Identification of Dogs and Cats](#)





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# Appendix D. Body Condition Charts

## Contents

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## Body Condition Assessment Charts

These charts may be used to help inspectors identify animals in critical or near critical condition which, if **not** addressed, could trigger a confiscation.

## Cat

Emaciated



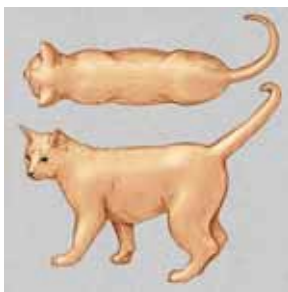
Ribs, lumbar vertebrae, pelvic bones and all body prominences evident from a distance. No discernible body fat. Obvious absence of muscle mass.

Underweight



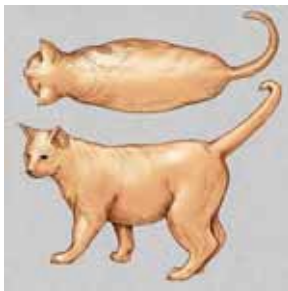
Ribs easily palpated and may be visible with no palpable fat. tops of lumbar vertebrae visible. Pelvic bones less prominent. Obvious waist and abdominal tuck.

Optimal body weight



Ribs palpable without excess fat covering. Abdomen tucked up when viewed from side.

Overweight



General fleshy appearance. Ribs palpable with difficulty. Noticeable fat deposits over lumbar spine and tail base. Abdominal tuck may be absent.

Obese



Large fat deposits over chest, spine, and tail base. Fat deposits on neck and limbs. Abdomen distended.

Source: Ohio State University, College of Veterinary Medicine

## Cougar

Emaciated

No photo

All ribs and vertebral bodies prominently showing, skin laying over hips and femur

Underweight



Ribs, vertebral bodies and hips slightly showing, "tucked up" appearance

Optimal body weight



Hint of ribs and vertebral bodies

([https://commons.wikimedia.org/wiki/File%3AMountain\\_Lion\\_\(Puma\)\\_-\\_Desert\\_Museum\\_-\\_Tucson\\_-AZ\\_-\\_2015-10-12at10-24-247\\_\(22066481590\).jpg](https://commons.wikimedia.org/wiki/File%3AMountain_Lion_(Puma)_-_Desert_Museum_-_Tucson_-AZ_-_2015-10-12at10-24-247_(22066481590).jpg))

Overweight



No hips or ribs showing, rotund appearance to abdomen

Obese



Abdomen sagging, obvious fat over hips and shoulders

Source unless otherwise noted: USDA-APHIS

## Dog

Emaciated



Ribs and lumbar vertebrae obvious, pelvic bones and all other bony structures obvious and prominent. Tail base prominent and bony. Accentuated concave abdominal tuck. Accentuated, severe hourglass shape to waist. No discernible body fat. Obvious loss of muscle mass.

Underweight



Ribs and lumbar vertebrae easily seen with no fat cover. Pelvic bones obvious. Tail base bony with little soft tissue. Marked concave abdominal tuck. Marked hourglass shape to waist.

Optimal body weight



Ribs, lumbar vertebrae, pelvic bones, and other bony structures easily palpable with slight fat cover. Tail base smooth with thin, soft tissue cover. Concave abdominal tuck. Smooth hourglass shape to waist.

Overweight



Ribs and lumbar vertebrae are difficult to palpate. Pelvic bones are palpable with moderate tissue cover. Tail base has fat deposition with moderate soft tissue cover. Concave tuck is decreased to absent. Loss of hourglass shape to waist with back is slightly broadened.

Obese



Ribs and lumbar vertebrae are very difficult to impossible to palpate. Pelvic bones are difficult to palpate with thick tissue cover. Tail base is thickened from fat disposition with thick soft tissue cover. Abdomen is convex with or without a pendulous ventral bulge. Back is markedly broadened.

([https://upload.wikimedia.org/wikipedia/commons/a/aa/AHey\\_Fatty.jpg](https://upload.wikimedia.org/wikipedia/commons/a/aa/AHey_Fatty.jpg))

Source unless otherwise noted: USDA-APHIS

## Elephant

Emaciated



All ribs and vertebral bodies prominently showing, skin laying over hips and femur

Underweight



Ribs, vertebral bodies and hips slightly showing, "tucked up" appearance

Optimal body weight



Hint of ribs and vertebral bodies, good muscle tone

Overweight



No hips or ribs showing, rotund appearance to abdomen

Obese



Abdomen sagging, obvious fat over hips and shoulders

Source: USDA-APHIS

## Leopard

Emaciated



All ribs and vertebral bodies prominently showing, skin laying over hips and femur

Underweight



Ribs, vertebral bodies and hips slightly showing, “tucked up” appearance

Optimal body weight



Hint of ribs and vertebral bodies

Source

Photo by Patrick Giraud courtesy of Wikimedia Commons ([http://en.wikipedia.org/wiki/File:Namibie\\_Etosh\\_a\\_Leopard\\_01edit.jpg](http://en.wikipedia.org/wiki/File:Namibie_Etosh_a_Leopard_01edit.jpg))

Overweight



No hips or ribs showing, rotund appearance to abdomen

Obese



Abdomen sagging, obvious fat over hips and shoulders

Source: USDA-APHIS

## Lion

Emaciated



All ribs and vertebral bodies prominently showing, skin laying over hips and femur

Underweight



Ribs, vertebral bodies and hips slightly showing, "tucked up" appearance

Optimal body weight



Hint of ribs and vertebral bodies

Overweight



No hips or ribs showing, rotund appearance to abdomen

Obese



Abdomen sagging, obvious fat over hips and shoulders

Source: USDA-APHIS

## Tiger

Emaciated



All ribs and vertebral bodies prominently showing, skin laying over hips and femur

Underweight



Ribs, vertebral bodies and hips slightly showing, “tucked up” appearance

Optimal body weight



Hint of ribs and vertebral bodies

Source

Photo by J&K Hollingsworth, U.S. Fish and Wildlife Service

Overweight



No hips or ribs showing, rotund appearance to abdomen

Obese



Abdomen sagging, obvious fat over hips and shoulders

Source: USDA-APHIS



## Tiger cub size information

Generic Bengal tiger cub weights are listed in Table D-1. Siberian tigers or Siberian/Bengal cross tiger cubs will be somewhat larger and often have longer, fuzzy hair. Females will often be a little smaller than males as they grow older. Birth weight is about 2.5 to 3.5 pounds.

Age	Weight (pounds)	Photograph
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1 week	4.5 – 6.0	
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Source: Point Defiance Zoo, Tacoma WA, <http://zooborns.com>

2 weeks	6.0 – 7.5	
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Source: San Diego Zoo, San Diego CA, <http://sdzoo.tumblr.com>

Age	Weight (pounds)	Photograph
3 weeks	7.5 – 9.0	

Source: Point Defiance Zoo, Tacoma WA, <http://zooborns.com>

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4 weeks	9 – 10	
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Source: <http://zooborns.com>

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5 weeks	10 – 12	
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Source: <http://zooborns.com>

Age	Weight (pounds)	Photograph
6 weeks	12 – 15	

Source: Point Defiance Zoo, Tacoma WA <http://zooborns.com>

7 weeks	14 – 17	
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Source: Point Defiance Zoo, Tacoma WA <http://zooborns.com>

8 weeks	16 – 19	
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Source: The [Calgary Herald](http://www.calgaryherald.com/index.html), <http://www.calgaryherald.com/index.html>

Age	Weight (pounds)	Photograph
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10 weeks	19 – 25	
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Source: USDA APHIS

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12 weeks	24 – 40	
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Source: <http://zooborns.com>

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16 weeks	35 – 50	
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Source: Wildlife Heritage Foundation <http://www.flickr.com>

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Age	Weight (pounds)	Photograph
20 weeks	55 – 68	 A photograph of three tiger cubs resting on a large, flat rock. The cubs are orange with black stripes and are looking towards the camera. The background is a natural, wooded area with green foliage.

Source: Bronx Zoo, Bronx NY <http://bronxzoo.com>



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## Appendix E. Acronyms

AAALAC - Association for Assessment and Accreditation of Laboratory Animal Care International

AALAS - American Association for Laboratory Animal Science

AC - Animal Care – a division of USDA, APHIS

ACI - Animal Care Inspector

ACIS - Animal Care Information System

AD - Assistant Director of Animal Welfare Operations

APHIS - Animal and Plant Health Inspection Service

AV - Attending Veterinarian

AVMA - American Veterinary Medical Association

AWA - Animal Welfare Act

AWIC - Animal Welfare Information Center

AWO - Animal Welfare Operations

CFR - Code of Federal Regulations

DRA - Dry resting area

FOIA - Freedom of Information Act

IACUC - Institutional Animal Care and Use Committee

ID - Identification

IES - Investigative and Enforcement Services

ILA - Inspection and Licensing Assistant

ILAR - Institute for Laboratory Animal Research

IO - Institutional Official

LOW - Letter of Warning (APHIS Form 7060)

MHD - Minimum horizontal dimension

MM - Marine mammal

NCI - Noncompliant item

NHP - Nonhuman primate

NIH - National Institutes of Health

NRC - National Research Council

OGC - Office of the General Counsel

OIG - Office of Inspector General

OLAW - Office of Laboratory Animal Welfare

PI - Principle Investigator

PII - Personally identifiable information (Information that can be used to uniquely identify an individual. Examples include, social security number, place of birth, date of birth, mother's maiden name, biometric record (such as fingerprint, iris scan, DNA), medical history information (including medical conditions and metric information, *e.g.* - weight, height, blood pressure), criminal history, employment information to include ratings, disciplinary actions, performance elements and standards, financial information, credit card numbers, bank account numbers, security clearance history.

PPQ - Plant Protection and Quarantine

PRN - Pro Re Nata, as needed

PS - Program Support

PVC - Program of veterinary care

RBIS - Risk-based inspection system

SACS - Supervisory Animal Care Specialist

SOTW - SACS of the Week

SPF - Specific pathogen free

TIN - Taxpayer identification number

TRA - Traveling-on-the-road site designation in ACIS

USC - United States Code

USDA - United States Department of Agriculture

USDI - United States Department of Interior

VMO - Veterinary Medical Officer



# Appendix F. Index

UNDER CONSTRUCTION

