



Counting Animals

317.1 Background

Neither the PHS Policy nor the Animal Welfare Act Regulations (AWAR) explicitly require an institutional mechanism to track animal usage by investigators under IACUC approved activities. However, both require that applications to the IACUC specify and include a rationale for the approximate number of animals proposed to be used (AWAR §2.31,e,1; §2.31,e,2; PHS Policy IV,D,1,b; Guide p. 25) and implicitly require mechanisms to monitor and document the number of animals acquired or produced and used in approved activities. This expectation includes any number of animals that are kept for breeding purposes, produced and culled prior to research use (not subjected to any experimental manipulations), held in unassigned pools, or used in field research. The use of dogs and cats specifically requires that acquisition and disposition records be maintained in compliance with federal law (AWAR §2.35,b,1– §2.35,b,7 8). The AWAR require that annual use of regulated species be reported by pain/distress category (AWAR §2.36,b,5–§2.36,b,8), while NIH, through its Office of Laboratory Animal Welfare (OLAW), requires reporting of average daily inventories of animals, by species, in new and renewal Animal Welfare Assurances.

317.2 Policy

With respect to the accuracy of the counting of animals acquired, produced, held and/or used in research, rats of the genus *Rattus*, mice of the genus *Mus* and fish may be tabulated using approximation in conformance with the expectation to tally animal use via "approximate means" (PHS Policy IV,D,1,a), in "appropriate amounts" (Guide for the Care and Use of Laboratory Animals, 8th edition, p. 12), or of "the minimum number to obtain valid results" (U.S. Government Principle III). All other vertebrate species are and must be accounted precisely by head-count. For the purpose of census and as related to production colonies, mice are accounted at the time of weaning; rats, voles, spiny mice, guinea pigs and other rodents are counted at the time of weaning; galliforme birds are counted at the time of hatching, passerine birds at the time they leave the nest; vertebrates with larval forms (frogs) are counted with their first breath; and all other USDA regulated species are counted at birth. In the case where immature subjects are used for purposes that may be painful, distressful, or invasive, their use must be tabulated at the time of use.

317.3 Process and Methodology

The IACUC delegates the responsibility for the proper use of methodology and best practices for tabulating and tracking animal use to the respective animal resources programs. Descriptions of their methods and practices are available via each animal care program (e.g., web site, SOP).

317.4 Property Documents

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