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DOD ANIMAL USE

Objectives and Performance Measures Needed to Monitor Use of Alternatives for Trauma Training

Why GAO Did This Study

DOD uses live animals, in addition to alternatives such as training videos, mannequins and cadavers, for trauma training—which is, training for military personnel to treat acute battlefield injuries. However, the use of animals in medical education has faced longstanding scrutiny due to a continuing focus on animal welfare and continued improvement in other training methods. Various laws have addressed how animals can be used in government testing, research, and training programs and have sought to reduce this use where possible. DOD has, among other things, established a two-level review process for documents justifying animal use for trauma training, called “protocols”.

GAO was asked to review DOD’s use of animals for trauma training. GAO evaluated the extent to which DOD has (1) made progress in its efforts to refine, reduce, and replace the use of animals for trauma training and (2) consistently applied guidance for reviewing and approving animal use protocols for trauma training. GAO analyzed DOD guidance and reviewed 21 fiscal year 2018–2020 animal use protocols for trauma training from the DOD component oversight offices included in GAO’s review.

What GAO Recommends

GAO makes three recommendations including that DOD develop measurable objectives, develop and use performance measures, and clarify guidance pertaining to DOD efforts to refine, reduce, and replace the use of animals in trauma training. In written comments, DOD concurred with all three of the recommendations.

What GAO Found

The Department of Defense (DOD) has undertaken department-wide efforts to refine, reduce, and replace the use of animals for trauma training, in accordance with DOD policy, but cannot fully demonstrate the extent to which DOD has made progress in minimizing animal use. DOD has, for example, developed an incremental approach to limit the use of animals in trauma training curricula and coordinated among DOD entities and industry partners to develop training alternatives (e.g., mannequins). DOD officials told GAO that it is difficult to establish measurable objectives because they cannot predict how effective alternatives will be in the future. However, DOD does not have performance measures upon which to rely when assessing DOD’s progress in reducing its use of animals. This lack of predictability does not preclude DOD from defining measurable objectives and then developing and using performance measures to monitor and evaluate its efforts. By developing specific and measurable objectives and performance measures for monitoring progress, DOD could provide greater assurance that it could assess progress in increasing its use of alternatives to live animals during trauma training.

DOD has inconsistently applied guidance for reviewing and approving trauma training protocols (see fig.).

DOD Review Process for Animal Use Protocols for Trauma Training

Principal investigator’s (PI) submission of animal use protocol

Institutional Animal Care and Use Committee (IACUC) review

Department of Defense (DOD) component oversight review

Revisions required – Protocol sent back to PI for revision. PI makes revisions and sends the protocol back through review process.

Protocol approved

Protocol used for trauma training

Source: GAO analysis of DOD documentation and interviews with DOD officials. | GAO-22-103992

That is, DOD component oversight offices have taken actions that they indicated are not needed (such as conducting certain literature searches) or implemented steps that may not be applicable to trauma training (such as obtaining statistician signatures). GAO found that the component oversight offices have done so because DOD had not clarified which provisions in its guidance specifically apply to animal use protocols for trauma training or what elements should be included in trauma training protocol documentation, as distinguished from protocol documentation for other contexts. By clarifying which guidance and data elements apply to animal use protocols for trauma training, DOD will be better positioned to ensure it is consistently applying its animal use policies for trauma training, such as considering alternatives to the use of animals whenever possible.