

IACUC POLICIES AND PROCEDURES

Procedures for Addressing Deficiencies

Inspections: Semiannual inspections and Continued Protocol Review (CPR) will be employed to oversee facilities and programs. The Principal Investigator (PI) of a program, facility manager, or a knowledgeable representative will be required to be present during each inspection. Lack of compliance with this requirement will cause the program to be referred to CPR for additional scrutiny. Follow-up inspections of areas and programs with deficiencies will be carried out by IACUC members, ORI-IACUC staff, and/or DLAR staff, which will report their findings to the IACUC chair (IC) and Attending Veterinarian (AV).

Responses: Based on the deficiency reports from 2004-2008, the deficiencies noted during inspections fall into two categories: Infrastructure and Behavior. Deficiencies in infrastructure are such problems as damaged flooring or walls, inadequate air filtration and temperature control, or inadequate security. Behavior deficiencies are such problems as inadequate sanitation, faulty surgical technique, or missing feeding/watering schedules. The IACUC will attempt to prevent repetition of these deficiencies by dealing with them in the following manner:

Infrastructure Deficiencies will be evaluated based on their severity and the degree to which they jeopardized animal care and health. If the IACUC decides that the deficiencies either do or could present a threat to animal health or safety, they will be classified as “significant” and reported to the appropriate university officials with a reasonable and specific plan, including dates, for their correction. Any failure to adhere to the plan and schedule that allows a significant deficiency to remain uncorrected shall be reported to the appropriate regulatory authorities (USDA, PHS-OLAW, AAALAC). Minor infrastructural deficiencies, those that do not pose a direct threat to animal health or well being, will be documented with a proposed correction schedule in the inspection report. In determining the correction schedule, the IACUC will consider the severity of the deficiency, the potential of the deficiency to adversely affect animal health, either directly or indirectly, and the logistical issues involved in the correction of the minor infrastructural deficiency.

Behavior Deficiencies will also be dealt with based on their severity. If a deficiency has a direct adverse affect on animal health or well being, it will be immediately reported to the AV who will take all appropriate actions, up to and including immediate protocol suspension pending IACUC evaluation, to ensure the continued health and well being of the animals. Behavioral deficiencies that are or may be a threat to the health and safety of the animals will be classified as significant deficiencies by the IACUC and reported to the Institutional Official with a plan and schedule for correction.

Specific training, related to the deficiency, will be mandated by the IACUC for every person listed on the relevant protocol. The PI will be required to adhere to the IACUC-approved plan for correcting the deficiency while the work continues. A follow-up inspection will be done, within a month of the plan's approval, to confirm that the plan and schedule for correction of the significant deficiency is being followed or that the deficiency has been corrected. Failure to adhere to the plan and schedule that allows a significant deficiency to remain uncorrected shall be reported to the appropriate regulatory authorities (USDA, PHS-OLAW, AAALAC). Failure to adhere to the plan and schedule for correction of the deficiency will result in possible sanctions or suspensions as deemed appropriate by the IACUC on a case-by-case basis.

Deficiencies that have a less direct impact on animal health and care will be dealt with on the following schedule. Upon initial report of a deficiency to the PI, the PI will have one week to present a plan, to the IC and AV, which rectifies the deficiency. A follow-up inspection, within a month's time, will be done to confirm that the deficiency has been corrected. At the end of that period, if the deficiency persists, specific training, related to the deficiency, will be mandatory for every person listed on the relevant protocol and must be completed within two weeks. The PI will be given those two weeks to resolve the deficiency. If inspection at the end of that period reveals that the deficiency has still not been rectified, the IACUC will consider sanctions or suspensions on a case-by-case basis.

Approved and Adopted by the
Institutional Animal Care and Use Committee
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