Washington State University

INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE

Policy #34: IACUC SEMIANNUAL INSPECTIONS AND PROGRAM REVIEW POLICY

A. Purpose:
The Institutional Animal Care and Use Committee (IACUC) is mandated by federal law (Public Health Service Policy and USDA Animal Welfare Act) to review the Institution's animal research program components, facilities, and animal use areas. In performing this review on a regular basis, the IACUC ensures animal well-being of the animals and compliance with Federal Regulations and Guidelines.

B. Principle:
The WSU IACUC is responsible for overseeing humane care and use of animals used in research and teaching and for ensuring adherence to regulatory expectations in the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals, and the Animal Welfare Act as well as standards contained in the Guide for the Care and Use of Laboratory Animals. The purpose of this policy is to educate personnel on procedures regarding semiannual inspections and program review.

C. Stakeholders:
Faculty, staff, animal facility management and care staff, students, contractors, personnel from collaborating institutions, external consultants and the general public

D. Process and Procedures:
Semiannual Animal Facility Inspection includes:
- All vertebrate animal housing locations where WSU animals are kept for greater than 12 hours.
  Support areas such as feed & materials storage, cage wash, & loading facilities are also included.
- All surgical locations.
- Other animal use areas may be added based upon need and circumstances.

Semiannual Program Review utilizes the applicable checklist provided by OLAW and includes review of:
- Institutional policies and responsibilities
- Veterinary medical care
E. Procedures:
Semiannual Facility/ Laboratory Inspection
The IACUC must have access to all animal housing and use areas for the purpose of verifying that activities involving animals are conducted in accordance with the proposal approved by that committee.

The IACUC office will contact the area supervisor/manager (facility manager, investigator, research personnel) or the PI a few weeks before the inspection to schedule the site visit. The area supervisor/manager coordinating the inspection must have access to the facility, and be familiar with procedures.

The IACUC will look for specific regulatory requirements, including but not limited to:

- Training records for personnel
- Animal use consistent with approved protocol
- Animal containment, safety & space requirements
- Animal husbandry including daily monitoring, feeding, watering & frequency of sanitation
- Appropriate drug storage, control, and expiration date monitoring
- Expired drugs & supplies are separated, marked, and/or disposed of properly
- Drug/controlled substances log
- Current (up to date) calibration of anesthetic vaporizers & appropriate scavenging of anesthetic waste gases
- Separate surgery areas for preparation, procedure, and recovery for USDA regulated species
- Aseptic technique used in all survival surgeries
- Anesthesia and surgical records
- Animal use, monitoring, treatment & medical records
- Staff knowledgeable of protocol
- General cleanliness of lab areas
- Physical plant conditions associated with safety, sanitation, security and HVAC
- SOPs are appropriately displayed or accessible
- Occupational safety measures
  - Hazard identification & standard operating procedures posted
  - Current biosafety cabinet or fume hood testing
  - Required personal protective equipment present & in use
  - No human food and/or drink in any animal housing room
  - Door signage and other notices
If any IACUC checklists of the previous site visit cycle are available, they will be presented to the IACUC inspection team and facility manager or investigators.

**Inspection Team**

The IACUC Inspection teams are assigned by the IACUC office and are comprised such that they are in compliance with all applicable regulations. The inspection team includes a minimum of one IACUC member, but more members will be typically utilized. At least, two IACUC members are required to complete the inspection in areas where USDA regulated animals are housed. No IACUC member may be excluded from an inspection in which they wish to participate. In some facilities, special entry requirements for non-essential personnel due to their controlled environments (e.g. specific pathogen free facilities), or special occupational health issues (e.g. Current TB Test) may need to be considered before allowing access to members.

**Conduct of Inspections**

Inspection team members are provided with inspection checklists. During the inspection, the team assesses the different aspects of the animal care and use program, as recommended for evaluation by the Office of Laboratory Animal Welfare (OLAW) and the USDA and listed on the form. The inspection is conducted in accordance with what is allowed by regulations and approved by the IACUC. The magnitude of any deficiencies and any other comments related to the inspected areas are documented. The timeline for the correction of each deficiency is indicated on the inspection form. A free text area is available on the form for the team’s remarks. At the end of the inspection, each team member reviews the draft report. Any minority opinions are documented on the form and discussed at a convened meeting.

**Deficiencies & Suggestions for Improvement**

The IACUC may cite any deficiency they observe. Deficiencies fall into two categories, “minor” and “significant.”

- **Significant Deficiency:** a deficiency that is, or may be, a threat to the health or safety of animals.
- **Minor Deficiency:** deviation(s) in policy, procedure, or facility condition from the standards enunciated in The Guides, PHS Policy, the AWARs, WSU IACUC policies and procedures, which are/were not justified exceptions to those standards. In comparison to the significant
deficiencies noted above, minor deficiencies are variances which require correction but which are not serious breaches of policy or conditions endangering the health and safety of the animals and/or people.

- **Suggestions for Improvement (SFI):** When other animal care and use issues are noted that do not fall into the minor or significant deficiency categories – these could be listed as suggestions for improvement. These are less serious in nature and are to be used to improve the facility and care of the animals.

Final categorization of all deficiencies and suggestions for improvement is done by a subcommittee of the WSU IACUC to ensure consistency. All IACUC members are invited to be part of the subcommittee.

**Follow-up**

The semi-annual inspection reports are provided to the IACUC for their review and approval at a subsequent committee meeting. The IACUC may require further actions or explanation of any finding or the corrective action timeline. The IACUC staff documents all meeting decisions, communicates any additional requirements or requests to the responsible parties and coordinates the resolution.

**Corrective Actions**

*Deficiencies:* Unless specified otherwise, the timeline for corrective actions begins when the facility manager, or the PI responsible for the space, receives formal notification from the IACUC office. It is the responsibility of the facility manager/investigator to correct the deficiencies identified in the report by the date required by the IACUC and to inform the IACUC staff of the corrective actions taken. The IACUC staff documents these corrections. Any significant deficiency that is not corrected by the specified date is reported to the Institutional Officer (IO) immediately and to the appropriate regulatory agencies within 15 business days following the specified date. Any minor deficiency that is not corrected by the specified date is reviewed by the IACUC, and necessary action is determined on a case-by-case basis.

*Suggestions for Improvement (SFI):* Items noted as suggestions for improvement do not require a response back to the WSU IACUC. If a response is returned to the WSU IACUC pertaining to an SFI, it will be documented with the formal inspection report/checklist for that facility, laboratory and/or area.
Reporting of results to the Institutional Official (IO)

The semiannual report to the IO includes the findings from both the facility inspections and the program review along with a list of all of the exceptions to the Guide or Animal Welfare Act that have been approved by the IACUC during the previous six months. Any delays, minority views or other issues related to the inspections are documented in the report. The report to the IO is reviewed at a convened meeting of the IACUC and signed by all IACUC members present at the meeting.

References


Public Health Service Policy on Humane Care and Use of Laboratory Animals http://grants.nih.gov/grants/olaw/references/phspol.htm

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