

	UCSD INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE POLICY MANUAL	POLICY # 11.03 Originally Issued: 7/17/02 Revised: 10/15/08 Revised: 11/18/15
	Compliance Policy	

I. Background and Purpose

The IACUC must ensure humane care and use of vertebrate animals used for research, instruction, and testing, and adhere to the applicable federal and state regulations and institutional policies affecting such use. As a result, the IACUC monitors the animal care and use program and its various components for compliance with all the appropriate regulations and policies.

The IACUC has the authority to gain access to all facilities used for the care and research of animals and to obtain any records and other relevant information related to the use of animals. The IACUC Office, through its Director and staff, is given the authority to act as the agent of the IACUC to conduct unannounced laboratory, satellite facility, and animal facility inspections on behalf of the IACUC, to perform compliance sanctions, to file required reports to governmental and accrediting agencies on behalf of UCSD, and act as the administrative agency in all matters prescribed by federal law to the IACUC (see PPM100.6).

II. Who Should Read This Policy

Everyone who uses or observes animal use at UCSD.

III. Definitions

Term	Definition
Animal use areas	All areas where animals are used including vivaria, satellite facilities, procedure rooms, labs and holding rooms

IV. Policy

1. Semiannual inspections of all animal use areas must be performed every six months and must include at least two IACUC members led by an IACUC staff member. Semiannual inspections are announced in advance to ensure that a laboratory representative will be present. Any IACUC member may attend any inspection.
2. In addition, unannounced compliance inspections of animal use areas will be performed by IACUC staff members.
3. All compliance deficiencies are reported to the Executive Subcommittee and the IACUC for discussion and action.
4. In the case of a compliance deficiency that acutely threatens animal health or welfare, the inspector(s) will take immediate corrective action which may include contacting the ACP veterinary staff, the IACUC chair or vice-chair or the investigator.

5. The IACUC Executive Subcommittee, on behalf of the IACUC, may take such actions as:
 - a. Require corrective training for the PI or staff
 - b. Require the PI to appear at an Executive Subcommittee or full IACUC meeting
 - c. Require that ACP temporarily take over animal care with PI responsible for costs
 - d. Temporarily suspend or modify animal use privileges (until deliberated by the IACUC)
 - e. Notify the PI's Department Chair, the Dean, and the Institutional Official
 - f. Determine if additional reporting or follow-up reporting to OLAW, USDA, AAALAC and appropriate funding agency
6. All actions taken by the Executive Committee are reported at the next IACUC meeting. The IACUC may determine if additional actions are required to resolve the compliance issues or whether animal use privileges and protocol approvals should be suspended or revoked.

V. Related Documents

Reporting Animal Concerns	http://blink.ucsd.edu/files/sponsor-tab/iacuc/Reporting%20Animal%20Concerns.pdf
Public Health Service Policy on Humane Care and Use of Laboratory Animals (OLAW/PHS Policy)	http://grants.nih.gov/grants/olaw/references/phspol.htm
Code of Federal Regulations (9 CFR)	http://www.gpo.gov/fdsys/pkg/CFR-2009-title9-vol1/xml/CFR-2009-title9-vol1-chapI-subchapA.xml
Association for Assessment and Accreditation of Laboratory Animal Care (AAALAC)	http://www.aaalac.org/accreditation/rules.cfm
UCSD PPM 100.6 Policy on the Use of Animals in Research and Teaching	http://blink.ucsd.edu/files/sponsor-tab/iacuc/100-6.pdf

VI. Additional information

Examples of compliance deficiencies include but are not limited to:

1. Neglect or cruelty to animals.
2. Conducting animal research that has not been approved by the IACUC.
3. Performance of procedures by personnel who are not listed in the approved protocol.
4. Performance of procedures that are not listed in the approved protocol.
5. Anesthetics, analgesics, tranquilizers, antibiotics, or other medications used in the lab are not noted in the protocol, are different from those listed in the protocol, or are not used in accordance with the protocol or policy.
6. Survival surgery is not performed using aseptic technique.
7. Euthanasia procedures that differ from those listed in the protocol and/or a method for ensuring death (e.g. after CO₂ exposure) are not employed.
8. Lab personnel lack the necessary training to appropriately perform procedures listed in the protocol.

9. Supporting documentation for animal care, post-op care, or other study procedures is incomplete or unavailable.
10. Conditions are not safe for humans and/or animals.
11. Outdated materials (drugs, experimental agents, suture, sterile supplies, etc.) are used on animals.
12. Animal overcrowding or failure to follow breeding policies.
13. Work is conducted outside of approved facilities.
14. Animals are not acquired or not transferred as approved in the protocol.
15. Housing and husbandry standards are not met.

Investigators should be aware of the university's requirements to report non-compliance as described by PHS (OLAW), USDA, and AAALAC.

1. Public Health Service (Office of Lab Animal Welfare)

Public Health Service Policy on Humane Care and Use of Laboratory Animals

IV. B.

As an agent of the institution, the IACUC shall with respect to PHS - conducted or supported activities:

3. prepare reports of the IACUC evaluations conducted as required by IV.B.1. and 2. of this Policy, and submit the reports to the Institutional Official; (NOTE: The reports shall be updated at least once every six months upon completion of the required semiannual evaluations and shall be maintained by the institution and made available to OLAW upon request. The reports must contain a description of the nature and extent of the institution's adherence to the Guide and this Policy and must identify specifically any departures from the provisions of the Guide and this Policy, and must state the reasons for each departure. The reports must distinguish significant deficiencies from minor deficiencies. A significant deficiency is one which, consistent with this Policy, and, in the judgment of the IACUC and the Institutional Official, is or may be a threat to the health or safety of the animals. If program or facility deficiencies are noted, the reports must contain a reasonable and specific plan and schedule for correcting each deficiency. If some or all of the institution's facilities are accredited by AAALAC International or another accrediting body recognized by PHS, the report should identify those facilities as such.)

IV.F.3. The IACUC, through the Institutional Official, shall promptly provide OLAW with a full explanation of the circumstances and actions taken with respect to:

- a. any serious or continuing noncompliance with this Policy;
- b. any serious deviation from the provisions of the Guide or
- c. any suspension of an activity by the IACUC.

2. USDA

9 CFR 2.31(c)3

Prepare reports of its evaluations conducted as required by paragraphs (c) (1) and (2) of this section, and submit the reports to the Institutional Official of the research facility;...The reports shall be updated at least once every six months upon completion of the required semiannual evaluations and shall be maintained by the research facility and made available to APHIS and to officials of funding Federal agencies for inspection and copying upon request. The reports must contain a description of the nature and extent of the research facility's adherence to this subchapter, must identify specifically any departures from the provisions of title 9, chapter I, subchapter A-- Animal Welfare, and must state the reasons for each departure. The reports must distinguish significant deficiencies from minor deficiencies. A significant deficiency is one which, with reference to Subchapter A, and, in the judgment of the IACUC and the Institutional Official, is or may be a threat to the health or safety of the animals. If program or facility deficiencies are noted, the reports must contain a reasonable and specific plan and schedule with dates for correcting each deficiency. Any failure to adhere to the plan and schedule that results in a significant deficiency remaining uncorrected shall be reported in writing within 15 business days by the IACUC, through the Institutional Official, to APHIS and any Federal agency funding that activity;

3. AAALAC

AAALAC Rules of Accreditation, Section 2, Standards, Point f.

In addition, the accredited unit shall promptly notify AAALAC International (e.g., through copies of correspondence) of adverse events relating to the animal care and use program. Examples include investigations by the USDA or OLAW, as well as other serious incidents or concerns that negatively impact animal well-being.