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'Sweatless' inspections: qualifications and proof

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The feeling of slight anxiety and minor armpit dampness, the excessive compulsive tendencies to make sure everything looks nice and tidy, the heightened awareness of all things and the extra effort to say the right thing—these physiologic responses and emotions are characteristic of a first date, yes, but also of a surprise or annual USDA, OLAW or IACUC inspection. Being prepared for an inspection is part of every staff member's and investigator's job, as much as we may like to pawn it off on our supervisors. Before you disagree, imagine what would happen if your facility failed a USDA inspection or was heavily cited for regulatory noncompliance. That could put research on hold, which could result in reductions in staff numbers or working hours. It could tarnish the reputation of your institution, resulting in fewer projects and less funding. It could negatively impact your institution's success in applying for federal research grants or interest in funding discovery-oriented research without possible human translation. These outcomes have personal consequences as well with potential and serious direct effects on your salary and working conditions. I hope that now you can see that it behooves everyone to be prepared for an inspection.

The scenario described in Silverman's Protocol Review column in this issue is a great reminder of the importance of being prepared for inspections. Whether the USDA inspector was right or wrong in citing Great Eastern University for noncompliance is perhaps irrelevant to this column, but the situation highlights the need for our training practices to be improved and perfected with everyone's

involvement. Training and qualification validation should be as concise and reputable as possible. Of course, as mentioned in the scenario, the traditional binder of training records should be kept available and up to date, but what about other possibilities? I suggest that research can adopt some of the customs promulgated by the Veterinary Practice Act or state regulations as a better practice.

For example, outside the research field, either federal or state law mandates the display of licenses and qualifications. Veterinarians must display a license to practice medicine in a conspicuous location in their clinics; registered veterinary technicians in California and other states are held to the same mandates. Even if the credentials of DVM, CVT, LVT or RVT are not required to work in research, we can still follow these examples. Hard-earned certificates from the Academy of Surgical Research or the American Association for Laboratory Animal Science should be displayed so that inspectors can see them. This might help to assuage concerns regarding the qualifications of staff members. The Society of Laboratory Animal Veterinary Technicians (<http://www.slavt.net/>) is in the process of gaining acceptance for the creation of a specialty academy in laboratory animal medicine for credentialed veterinary technicians recognized by the American Veterinary Medical Association and the National Association of Veterinary Technicians in America, similar to the American College of Laboratory Animal Medicine for veterinarians. Certification of this type would undoubtedly help to confirm

that research technicians are trained and qualified.

Another way to make staff training and qualifications more visible to inspectors would be to hold an in-house training seminar on the same day as an annual inspection. Although this can be logistically challenging and may increase stress levels, allowing inspectors to observe training first-hand could be more convincing and impressive than paperwork alone. The sight of a training session in progress might also be a refreshing one for inspectors compared with the more common sight of staff fleeing like cockroaches when the lights are turned on.

Although management-driven and -funded training is important, sometimes that just doesn't happen. As an individual, however, you have options even if your institution has no training funds available. Search online for free continuing education (CE) seminars or for discounts given to members of particular associations or organizations. Investigate vendor-sponsored CE opportunities, as mentioned in previous Fruits of Education columns. Find out if your university or institution offers occasional grants for educational purposes or other employer compensation such as 'professional time' for attending career- or job-related seminars, as these benefits are often forgotten or overlooked. When searching for a job or negotiating an employment contract, ask to include CE opportunities—at worst, they may say, "No."

As the USDA inspector pointed out at Great Eastern University, appropriate training is critical in surgery. A little 'sweat' beforehand might be needed to prove it.

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