

Jerald Silverman, DVM, Column Coordinator

Setting timelines to correct deficiencies

The Great Eastern University IACUC always had problems with two aspects of the semiannual inspection process. The first was obtaining the reports from the various inspection groups in a timely manner, and the second was agreeing on the amount of time to be allowed for the correction of any deficiencies that were found. After surviving the most recent round of arguing about the time period to be allowed for correcting deficiencies, Anna Wainwright, the IACUC administrator, asked if it would be allowable to have the committee's chair make that decision.

"Well, I guess if the committee votes to approve Larry making the decision, it will be OK," said Donna Brown, one of the veterinarians. "The regulations say that the report has to contain a timeline for deficiencies found to be corrected, but they don't say anything about who gets to make that decision."

"Wait a second," said Larry Covelli, the IACUC chair. "If it's true that there are no regulations defining who has the responsibility for setting the timeline for corrections, then I would prefer to have the animal care group make that decision, because they work more closely with the

Maintenance department than any of us do, and they would have a much better feel for realistic time limits."

"Actually, I would rather not have my department do that," said Brown. "Because then the IACUC will expect our animal care staff to follow up with Maintenance in case the work doesn't get done, and if it gets done incorrectly, people will expect animal care to resolve the problem. This is an IACUC concern, not an animal care issue."

Who do you think should have the responsibility for setting the time limit for the correction of deficiencies found on a semiannual inspection (or program review)?

RESPONSE

Compliance and communication

Rhonda Griess, BSc, LAT

The *Guide for the Care and Use of Laboratory Animals*¹ states, "Both the Health Research Extension Act and the AWA [Animal Welfare Act] require the IACUC to inspect animal care and use facilities, including sites used for animal surgeries, every 6 months." This ongoing issue between Covelli and Brown should be addressed with an agreeable policy concerning the responsibility for inspection follow-up. It is paramount to have a liaison, agreed upon by the department and IACUC, who is responsible for overseeing the correction of deficiencies (compliance) and communication with the IACUC.

After the inspection report is complete, this liaison should meet with the IACUC to discuss how the inspection deficiencies will be resolved. At this meeting, the timeline for correction can also be discussed and formed (compliance). All deficiencies should be addressed and corrected, or be

in the process of being corrected, before the next inspection (communication). The timeline can vary depending on the severity of the deficiency and complexity of correction. Any deficiency that is not corrected before the next semiannual inspection will go from being a minor deficiency to a significant deficiency and will then have top priority for correction.

If the deficiency is a structural issue, the liaison will pass it on to a designated representative in the maintenance or facilities department for correction. These corrections may require a work order, which could also be reported back to the IACUC to further facilitate communication. Corrections should be reported to the IACUC as they are completed. It is beneficial to designate a person to oversee the correction of inspection deficiencies and to facilitate communication between the department and the IACUC.

1. Institute for Laboratory Animal Research. *Guide for the Care and Use of Laboratory Animals* 8th edn. (National Academies Press, Washington, DC, 2011).

Griess is Manager, Small Animal Laboratory, University of Nebraska-Lincoln, Lincoln, NE.

RESPONSE

IACUC is responsible

Joan T. Richerson, MS, DVM, MS, DACLAM, CPIA & Alice Huang, PhD, CPIA

The USDA Animal Welfare Act and regulations (AWARs)¹ and the Public Health Service *Policy on Humane Care and Use of Laboratory Animals* (PHS Policy)² both require the IACUC to evaluate the institution's programs and facilities semiannually³. The IACUC may be represented by a subcommittee of at least two IACUC members appointed by the IACUC chair (provided any member who wishes to do so is allowed to participate), and the IACUC may elect to include *ad hoc* consultants in conducting the evaluation. The PHS Policy requires that the evaluations be based on the *Guide for the Care and Use of Laboratory Animals* (Guide)⁴, and compliance with the AWARs is also required.

Brown, the veterinarian, is correct when she states that it is the IACUC's responsibility to set a reasonable and specific plan and schedule for correction of deficiencies. The IACUC must first classify each deficiency as either minor