

PURPOSE

The purpose of the University Animal Care Committee (UACC) Procedures on Animal Use Non-Compliance is to define non-compliance and to identify the processes involved to address animal use non-compliance.

BACKGROUND

Animal use for teaching, research, testing, and production must align with Canadian Council on Animal Care (CCAC) and University of Saskatchewan requirements as identified in existing policy and procedure documents, standard operating procedures, and approved Animal Use Protocols (AUP). The CCAC requires that the UACC be responsible “for determining and working to correct breaches of compliance with approved AUPs and SOPs... a collegial manner with the animal users and attempt to correct deficiencies collaboratively” (from the CCAC Terms of Reference for animal care committees (2007)). The UACC involves senior university administration in the resolution of the non-compliance ONLY when the UACC is unsuccessful in resolving the breach of compliance.

SCOPE AND DEFINITION

Animal Use Non-Compliance Procedures apply to all animal users of the University of Saskatchewan Animal Care and Use Program. Animal users include faculty, postdoctoral fellows, graduate students, undergraduate students, research technicians/associates, visiting scientists/scholars, animal care staff, facility managers, facility veterinarians, the Animal Welfare Veterinarian and the University Veterinarian.

The procedures apply to any animal user who has:

1. Failed to receive UACC approval for the animal use (no AUP).
2. Deviated procedurally or ethically from an UACC Animal Research Ethics Board (AREB) approved AUP.
 - a. Ethical Non-Compliance refers to
 - i. continued breaches of compliance;
 - ii. animal procedures causing pain or distress not approved by the AREB;
 - iii. serious threats to health and safety of personnel or animals.
 - b. Procedural Non-Compliance refers to
 - i. protocol drift (small changes in procedures not covered in approved AUP);
 - ii. animal use that exceeds authorized numbers;
 - iii. continued animal use on protocols past their expiration date;
 - iv. outstanding administrative or personnel training requirements;

- v. inadequate animal records and reporting (e.g. morbidity/mortality/welfare incident report, use of surgical monitoring records).
3. Failed to meet animal care standards as outlined by U of S and CCAC guidelines, policies, and procedures.

PROCEDURES

The UACC works collaboratively with the person(s) involved in the non-compliance to resolve the non-compliance, and has authority to take any immediate measures to ensure animal well-being or personnel safety. The Office of Vice President Research (OVPR) becomes directly involved only when the UACC fails to resolve the non-compliance. The University Veterinarian (UV) and UACC Chair or delegate will initiate the response to the non-compliance with final documentation and reporting to the UACC and OVPR.

General procedures for a response to non-compliance depend upon the nature of the non-compliance. Failure to receive UACC approval, deviation from an approved AUP, or failure to meet animal care standards are consolidated into two sets of procedures broadly classified into ethical and procedural non-compliance procedures outlined as follows:

1. Ethical Non-Compliance Procedures

Incidents of ethical non-compliance require immediate action from the UACC.

- a. The UV contacts the animal user, UACC Chair or delegate, and OVPR prior to any action unless an immediate euthanasia is warranted. The Facility Veterinarian has authority to euthanize.
- b. The animal user must immediately stop all objectionable procedures.
 - i. Facility Veterinarian (FV) and animal care staff will provide appropriate interventions to the animal(s).
 - ii. If personnel health and safety is at question, Safety Resources is contacted and appropriate interventions instituted.
 - iii. The UV will suspend the active protocol if the animal user is a Principal Investigator (PI).
 - I. Protocol suspension results in the suspension of animal procedures, animal ordering, and animal breeding and transfer of existing animals onto the Facility holding protocol.
 - II. The protocol will remain suspended until resolution of the ethical non-compliance.
- c. Facility managers/animal care staff/Facility Veterinarian as appropriate will provide a report to the University Veterinarian and UACC Chair or delegate on the non-compliance issue.
- d. The Executive Committee (EC) of the UACC will convene a meeting to discuss the reported issue and determine whether additional information is required.

- e. The UACC EC will meet with animal user to discuss the facts of the issue and will recommend a resolution.
- f. The EC is responsible for determining when reactivation of a suspended protocol is warranted.
- g. A recurrence of non-compliance may result in a permanent protocol suspension (if the animal user is a PI) and retraining of the animal user.
 - i. Despite retraining repeated breaches will result in removal of the animal user from the Animal Care and Use Program.

2. Procedural Non-Compliance

Incidents of procedural non-compliance can be resolved through a collaborative process with the animal user.

- a. Following identification of procedural non-compliance, the UV will contact the animal user and identify the non-compliance issue. The UV and the animal user will discuss the issue and arrive at a mutually agreed resolution. Resolutions will take the form of:
 - i. Protocol modifications for protocol drift and animal use that exceeds authorized numbers.
 - ii. Submission of late annual renewals for AREB approval.
 - iii. UV and Research Ethics Office (REO) facilitation of the animal user to meet outstanding animal user training and protocol administrative requirements.
 - iv. Facilitation by facility veterinarians and facility managers to ensure appropriate procedural and record-keeping alterations.
- b. Procedural non-compliance not resolved through the collaborative process will be referred to the UACC EC as per ethical non-compliance procedures.

3. Documentation

- a. The University Veterinarian and UACC Chair or delegate will detail verified serious non-compliance incidents or continuous breaches of compliance in a written report.
 - i. The report is filed with protocol file (if applicable) or in the REO.
 - ii. The animal user, the administrative head of the animal user's unit, and OVPR will receive a formal letter outlining the non-compliance and UACC recommendations.
 - iii. The animal user may appeal to the OVPR and the OVPR review the details of the non-compliance and the UACC recommendations. OVPR written decision is final.

Approved by UACC, 30 May 2014