REPORTING CONCERNS; RECORD KEEPING

In previous issues we discussed the Policy regarding “CAR Policy on Report and Follow-up of Concerns about Animal Care and Use”. Copies of the forms and procedures are posted throughout the LARC facilities and are also available on the CAR website at http://www.ucsf.edu/ora/car/.

The Committee would like to encourage employees to forward their concerns to the CAR, and to reemphasize that:
- All concerns expressed will be followed-up quickly and thoroughly and acted upon accordingly.
- The reports can be submitted anonymously.
- If a name is provided but the individual(s) reporting wish to remain anonymous, their names will be held confidential.

Record keeping

In the last three issues of the LARC Newsletter we have included discussions regarding the record keeping requirements, yet it appears that we are continuing to encounter programmatic deficiencies with this particular aspect of the requirements. The two main causes of the deficiencies are:
- Not maintaining the records due to omissions, or
- Lack of knowledge by staff on record keeping requirements.

The CAR considers record keeping deficiencies (regardless of the reason) as serious violations of the protocol and will take appropriate action including suspension of the protocol. These records are the best evidence to external agencies such as the NIH and USDA that good animal care practices are being followed by the researchers.

"It should also be noted that if a protocol is suspended then both the USDA and Office of Laboratory Animal Welfare of the NIH (previously OPRR) has to be notified of the suspension." (Continued on page 4, see Reporting)

RODENT SPACE ALLOCATION POLICY

Goal: To efficiently utilize space at capacity demand and at the same time to provide for the stability needed to support individual research efforts.

Background: Rodent space at UCSF is now essentially filled and additional demand is currently not being met. Demand for this space has increased at an unprecedented rate over the past several years with the advent of powerful new methods for the genetic manipulation of rodents being a primary driving force. The office of the Vice-Chancellor for Research is making vigorous efforts to meet the current demand, but between now and the opening of the new Parnassus and Mission Bay animal care facilities in 2003, it is likely that our space will be utilized at capacity, at least at most sites. Therefore, new rules and principles of operation are needed to maximize efficiency and at the same time to provide the stability that investigators need to conduct their research. The SFGH sites and the Mt. Zion Cancer Center facility will continue to manage their rodent facilities as they have in the past, as their current governance procedures are working well to accomplish the goals set forth here. Thus, this new policy applies to the UCSF sites other than those two sites.

Each UCSF investigator using rodents will be assigned an official allotment of space. The allotment will be a number of cages in a defined location(s). For the most part, this allotment will equal the average census between 1/1/00 and 6/30/00, based on recharge records. LARC will inform investigators of their allotments in the near future. Exceptions to the procedure for determining initial allotments will be entertained by the Animal Users Advisory Committee (Committee), based on the following: a) prior recruitment or retention commitments made in the last 5 years and not yet fully occupied, b) commitments of space granted to investigators by this committee after 10/1/99, or c) special circumstances resulting (Continued on page 2, see Rodent Space)
in a lower than normal census during the defined period. If an investigator does not feel that the allotment assigned to him/her is appropriate, an appeal may be made to the Committee on one of these three grounds.

Although the allotment to an investigator will be defined as being within a particular site (Parnassus, MCB; barrier, conventional, etc.), LARC staff may place investigator cages in whatever room or rooms within that site will be maximally efficient for the facility. Efforts will be made to keep an investigator’s cages in the fewest rooms possible. No investigator is “entitled” to occupy a particular room exclusively without specific approval from the Committee. In a few cases, recent recruitment or retention commitments have been made that are exceptions to this policy.

Investigators will be grouped into small units based on the proximity of the assigned space to one another and these groupings will be posted in the animal rooms. Within these groupings (or, less frequently between groupings), investigators should act cooperatively to maximize the utilization of the space on a day-to-day basis. Investigators who are currently using less than their official allotment are encouraged to allow other investigators in the grouping to temporarily use the open space if desired. Such arrangements are voluntary and should include an agreed upon plan for the investigator to reclaim the allotted space when needed. We note that such arrangements are highly successful where they are currently being used on campus, as one might expect given the collegial atmosphere at UCSF.

The Committee will prioritize requests for additional space as new space becomes available to LARC. Commitments of LARC space to current investigators, new recruitments or retention efforts may only be made from the Committee or the Vice-Chancellor for Research’s office. Requests for additional space should be submitted to Ara Tahmassian, Assistant Vice-Chancellor for Research Services (Box 0942) and accompanied by a paragraph explaining for what the space would be used, and, in the case of investigators with currently assigned space, why additional space is needed. These requests may be submitted at any time and will be held until new space becomes available. It should be noted that until the Parnassus Services Bldg. is completed in 2003, most new space will not be on Parnassus, so the request should indicate whether off-campus space would be acceptable.

In the future, allotments to individual investigators may be decreased if there is a substantial underutilization of the assigned space over the previous 6 months or more. In such cases, the investigator will be contacted to see if an exception is warranted due to temporary circumstances (decreased colony size due to recovery from an infection, etc.). A goal of the new policy is to allow investigators to use less than their assigned space without compromising their ability to do their work at a future time, however, it is also important that as many investigators be accommodated as possible, so the allotments should reflect near-term need.

The LARC has been requested to provide a colony management consulting service to review breeding practices and to provide advice on efficiency improvements. Details of this program will be announced by LARC when it becomes available.

Any additional suggestions for improvement of facilities for rodent animal research are welcome and should be addressed to the Committee Chair Anthony DeFranco at Box 0552 or defranco@cgl.ucsf.edu.

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“ANIMALS IN RESEARCH”

EXCERPTED PARTS OF
HEALTH RESEARCH EXTENSION ACT OF 1985
PUBLIC LAW 99-158

The Secretary, acting through the Director of NIH, shall establish guidelines for the following:

“• The proper care of animals to be used in biomedical and behavioral research.

• The proper treatment of animals while being used in such research. Guidelines under this paragraph shall require-

  “the appropriate use of tranquilizers, analgesics, anesthetics, paralytics, and euthanasia for animals in such research;

  and

  “appropriate pre-surgical and post-surgical veterinary medical and nursing care for animals in such research.

Such guidelines shall not be construed to prescribe methods of research.

(Continued on page 3, see Research)
“Sharps” are ubiquitous in the research environment - items such as needles, syringes, suture needles, scalpel blades, pipettes and slides that are not stored and/or disposed of properly can pose a significant health risk to employees. Improper disposal of sharps with regular trash can expose custodial and animal care staff to puncture wounds and cuts and/or expose them to infectious agents and hazardous chemicals. All employees should be made aware of the importance of the proper usage and disposal of sharps and should abide by the following basic guidelines:

• Do not store sharps (used or unused) in your desk, locker, labcoat, scrubs, fanny pack etc.

• Dispose of all sharps only in designated containers, which are provided in each animal room, and clinical area (Principal Investigators are responsible for providing them in private lab space).

• Do not shove sharps into an overflowing container. The LARC Animal Technician assigned to service each room will close the sharps containers before they are full and ensure that a new container is provided. This practice should be followed in labs also.

• The open lids on new sharps containers in labs and animal rooms should be covered with a disposable bonnet to prevent contamination.

Questions on which areas and rooms should have a sharps container should be addressed to the LARC Occupational Health & Safety Coordinator at 476-6140.

(Research, continued)
The organization and operation of animal care committees.

- Guidelines of the Secretary shall require animal care committees at each entity which conducts biomedical and behavioral research with funds provided under this Act (including the National Institutes of Health and the national research institutes) to assure compliance with the guidelines.

- Each animal care committee shall be appointed by the chief executive officer of the entity for which the committee is established.

Each animal care committee of a research entity shall:

• review the care and treatment of animals in all animal study areas and facilities of the research entity at least semiannually to evaluate compliance with applicable guidelines established for appropriate animal care and treatment;

• keep appropriate records of reviews conducted; and

• for each review conducted, file with the Director of NIH at least annually
  (i) a certification that the review has been conducted, and (ii) reports of any violations of guidelines established under subsection (a) or assurances required ... which were observed in such review and which have continued after notice by the committee to the research entity involved of the violations.

Reports shall include any minority views filed by members of the committee.

The Director of NIH shall require each applicant for a grant, contract, or cooperative agreement involving research on animals which is administered by the National Institutes of Health or any national research institute to include in its application or contract proposal, ...-

• assurances satisfactory to the Director of NIH that “(A) the applicant meets the requirements of the guidelines established [and] has an animal care committee which meets the requirements ... and scientists, animal technicians, and other personnel involved with animal care, treatment, and use by the applicant have available to them instruction or training in the humane practice of animal maintenance and experimentation, and the concept, availability, and use of research or testing methods that limit the use of animals or limit animal distress; and a statement of the reasons for the use of animals in the research to be conducted with funds provided under such grant or contract.

• If the Director of NIH determines that - the conditions of animal care, treatment, or use in an entity which is receiving a grant, contract, or cooperative agreement involving research on animals under this title do not meet applicable guidelines established ... the entity has been notified by the Director of NIH of such determination and has been given a reasonable opportunity to take corrective action; and no action has been taken by the entity to correct such conditions; the Director of NIH shall suspend or revoke such grant or contract under such conditions as the Director determines appropriate.

DISPOSING OF SHARPS

“Sharps” are ubiquitous in the research environment - items such as needles, syringes, suture needles, scalpel blades, pipettes and slides that are not stored and/or disposed of properly can pose a significant health risk to employees. Improper disposal of sharps with regular trash can expose custodial and animal care staff to puncture wounds and cuts and/or expose them to infectious agents and hazardous chemicals. All employees should be made aware of the importance of the proper usage and disposal of sharps and should abide by the following basic guidelines:

• Do not store sharps (used or unused) in your desk, locker, labcoat, scrubs, fanny pack etc.

• Dispose of all sharps only in designated containers, which are provided in each animal room, and clinical area (Principal Investigators are responsible for providing them in private lab space).

• Do not shove sharps into an overflowing container. The LARC Animal Technician assigned to service each room will close the sharps containers before they are full and ensure that a new container is provided. This practice should be followed in labs also.

• The open lids on new sharps containers in labs and animal rooms should be covered with a disposable bonnet to prevent contamination.

Questions on which areas and rooms should have a sharps container should be addressed to the LARC Occupational Health & Safety Coordinator at 476-6140.
The CAR would like to restate the following requirements:

• All individuals listed on a protocol are required to read and sign the protocol logbook verifying that they have read and understood the content of the protocol.

• Investigators and their staff are responsible for maintaining the required records.

• Records include:
  • Those required pre-, intra and post-operative monitoring and care,
  • Administration of anesthetics, analgesics and other agents including information about dose, frequency and duration of treatment,
  • All other record keeping commitments made in the protocol application (e.g. feed).

• It is the responsibility of the Principal Investigator to make sure that all appropriate records are maintained.

• CAR members and Education and Compliance Assistance Program staff will conduct periodic review of the records and verify that they are in accordance with those approved.

In recent months the Office of Laboratory Animal Welfare (OLAW) at the NIH has increased its monitoring of certain US Public Health Service (PHS) regulations related to proposal submissions to PHS agencies. These regulations require consistency in the animal care and use components of all contract and grant applications and the corresponding application submitted to the Institutional Animal Care and Use Committee (IACUC which is the CAR at UCSF). They also require that either a CAR approval or an application for the use of animal subjects must be on file with the CAR at the time of grant proposal submission. For details about important changes in C&G procedures to better reflect these PHS requirements, please refer to the CAR website at www.ucsf.edu/ora/car.