

Top 10 Deficiencies from the Perspective of USDA, OLAW, and AAALAC

Based on a review of 1,724 citations, USDA reported the following as most frequent violations:

1. Issues with IACUC Reports on Semi-annual Program Reviews and Inspections (reports and inspections not conducted in a timely manner; reports not signed by the majority of the committee, reports not submitted within 15 days)
2. Protocol Reviews (descriptions of procedures incomplete; work performed that is not covered by a protocol)
3. Outdated Pharmaceuticals (present in lab/facility and available for use)
4. Search for Alternatives (search described does not relate to pain/distress or minimizing those; search does not address specific procedures included in protocol)
5. House Keeping (facilities must be clean and in good repair; accumulations of trash have been major concern)
6. Semi-annual Inspections (not done on time - i.e. every 6 months; when a date slides, the schedule should not be reset - i.e. the committee should get back on schedule with following inspection)
7. Access and Inspection of Facilities (must have someone available to allow inspections of records, facilities, and animals; must allow inspectors to take photographs - this is now a requirement of USDA inspectors in specific situations)
8. Veterinary Care (daily observations to assess health and well being are a must; communications with vets and vet techs must be timely)
9. Occupational Health/Safety Issues (all staff must be made aware of OHS facilities, personnel, equipment, and services; documentation must be available)
10. Rationale for Involving Animals and Appropriateness of Species and Numbers (most citations are for failure to provide an adequate rationale for using animals)

Based on 4,694 reportable issues (73% in higher education institutions), OLAW has identified three main groups of related issues:

1. Protocol Issues (failure to follow approved protocols, unapproved significant changes to protocols by PIs, work conducted prior to protocol approval, inadequate PI oversight of protocol implementation, doing work under expired protocols)
2. Husbandry (inadequate records/inadequate identification of individual animals - i.e. inability to tie records back to specific animals, escaped animals, lack of enrichment)
3. Other (human errors/accidents; natural disasters; equipment failures; training failures; crime, neglect and abuse [this was noted as occurring rarely, but is categorized for reporting purposes within the "other" category])

The OLAW inspector noted that 55% of all concerns with physical facilities related to HVAC systems, and stressed that it is always better to err on the side of reporting as the consequences for reporting are almost always less if the incident results in a penalty (i.e. not reporting results in larger fines).

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Based on certification reviews for 800+ institutions, AAALAC reports that the bulk of accreditation denials stem from:

1. Occupational Health and Safety Issues (OHS programs not fully implemented, inadequate coordination, inconsistent implementation, risk assessments based on contact time rather than actual risk [e.g. *Ebola* doesn't require significant contact time but is of high risk], lack of follow up after initial medical assessments [e.g., for vaccines], lack of safety training for personnel [particularly a concern for student-employees])
2. Protocol Reviews (lack of intensity of protocol reviews, lack of clear procedures or failure of ACUC to follow procedures when doing reviews, inappropriate use of committee alternates, lack of a defined schedule for administration of analgesia, inappropriate/inadequate committee composition)
3. HVAC Systems (significant cause of animal deaths; inadequate maintenance of temperature according to *Guide*, inappropriate relative air pressure differential, environmental data to complete/not being recorded, inadequate air changes, inability to maintain humidity)