

## IACUC Training Exercise #3 – 2022 (Semiannual Evaluation – Plan of Corrective Action)



further consideration.

The following exercise is a continuation of exercises #1-2022 and #2-2022, and may be useful in stimulating discussion regarding compliance with PHS Policy and VA Handbook 1200.07. To facilitate discussion, page 1 of the exercise may be distributed to the IACUC members prior to a meeting. After a few minutes of discussion during the meeting, the page 2 may be distributed for the committee's

Recall: Ted Bramble and Dr. Cheryl Spring had conducted a facility inspection for the semiannual evaluation, and had noted deficiencies. Ted and Dr. Spring had dropped off their checklists for the IACUC Coordinator, Anne Marie, to enter into the semiannual report form Part 1B that the IACUC would review at the meeting scheduled for next week. In addition to filling in the checklist forms to reflect the observations of the inspectors, she also set up a row in the table in Part 2 of the report, for each of the deficiencies noted. This was to prompt the IACUC to evaluate and categorize the deficiencies and decide on the appropriate plan and timetable for correction for each one.

Next: When the IACUC met, the members acknowledged that what appeared to be bedding had been noted on the floor in one rat housing room, and that Ted and Dr. Spring had suggested it be designated a minor deficiency. They began discussing how to make it clearer to VMU personnel that sanitation in the VMU needs more attention. Autumn, the VMU Supervisor, and Jerry, the animal caretaker, do not routinely attend IACUC meetings, but had been welcomed in the past, when they had information to share about the VMU. Thinking that the IACUC might want to know the latest on the bedding mystery, they knocked on the conference room door and were admitted. When they started to explain why they were there, the Chair interrupted to say that the committee was just discussing the lapse in sanitation of the rat housing room that the semiannual inspectors had noted, and that Autumn and Jerry would have to leave the room while the IACUC reviewed the inspectors' findings and decided on how to improve the sanitation standards in the VMU.

**For IACUC discussion: Does the IACUC's approach seem reasonable, based on the information they have received? What is the likely result of the IACUC's focus on sanitation standards, given what you know about Jerry's discovery of the nest in the wall and Autumn's prompt call to the pest control vendor? What would you recommend as an appropriate corrective action plan, in light of the information that Jerry and Autumn had for the IACUC?**

Reprimanding Autumn and Jerry, and requiring a review of sanitation practices would not only fail to correct the real problem, rodent infestation, but would also undermine Autumn's and Jerry's confidence that the IACUC values their contributions and considers them part of the team working to maintain a high quality program of research with animals.

A better approach would be for the IACUC to encourage Jerry and Autumn to tell the IACUC what they had observed about the bedding on the floor of the rat housing room. That way, the IACUC would have learned about the loose electrical outlet cover plate that Jerry had noticed and removed, revealing a mouse nest. They would also have heard that he had promptly reported his finding to Autumn, and she had already arranged for the pest control company to investigate and then implement a rodent infestation elimination and control plan. Even if Jerry had not noticed anything besides that the bedding kept reappearing on the floor, that would have given the IACUC a lead on investigating further. In any case, hearing out Jerry and Autumn would not interfere with the IACUC deliberating afterwards in a closed meeting, to decide what to make of the situation and what actions are needed to address it.

The appropriate corrective action depends on the root cause(s) of the observed "bedding" on the floor, so it's not sufficient for the IACUC to simply require improved sanitation efforts.