

IACUC Training Exercise #2 – 2022 (Semiannual Evaluations – Plan of Corrective Action)



The following exercise is a continuation of exercise #1-2022 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 the IACUC discusses the question during the meeting, page 2 may be distributed for the committee's further consideration.

Recall: Ted Bramble and Dr. Cheryl Spring had conducted a facility inspection for the semiannual evaluation, and had noted deficiencies on their checklists.

Next: Ted and Dr. Spring 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. Anne Marie waited to collect the checklists from the other two IACUC members who had been assigned to conduct facility inspections, before getting to work on the report forms. 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 would prompt the IACUC to evaluate and categorize the deficiencies and decide on the appropriate plan and timetable for correction of each one.

When the IACUC met, the overheated housing room got everyone's attention. There was general outrage that Facilities Management could have missed such a thing. The IACUC was very concerned that, although the room had happened to be empty (lucky break!), this could have happened in any of the rooms. The IACUC was also annoyed with Anne Marie for not bringing this to their attention right away, when she received the checklists. Dr. Spring reminded the IACUC that she had checked for animals in the room and it had been empty, but other committee members retorted that Anne Marie had failed to note that point in the semiannual report forms and the consequences would have been disastrous if animals had been housed in the affected room. For corrective action, the IACUC decided that the IACUC Chair should meet with the Chief Engineer of Facilities Management to review what the inspectors had discovered and to re-emphasize the importance of monitoring and responding promptly to overheating in the animal housing rooms. After that, another unannounced overheat test would be conducted, to show Facilities Management that the IACUC meant business. If the result of that test turned out to be unsatisfactory, this would be brought to the attention of the Director.

For IACUC discussion: Assume that the scenario described in Exercise #1 was what had happened, and the overheating had occurred during a planned disconnection of that room from the monitoring system. Facilities Management had alerted the VMU Supervisor ahead of time, and the VMU Supervisor had moved the animals out of that room so that they would not be affected. In light of this information, would you recommend anything different for the IACUC's approach with Facilities Management?

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Points For the IACUC to Consider

Given that Facilities Management had notified the VMU Supervisor that repairs were to be made that required taking a zone of rooms off the Building Management System, and the VMU Supervisor had moved the animals, the corrective actions decided on by the IACUC would not only fail to correct the problem, but would likely antagonize the Facilities Management Service and undermine the IACUC's credibility with them in the future.

Rather than assuming incompetence or negligence right away, the IACUC would have been better off trying to find out more about the situation before jumping to conclusions and deciding on a course of action. In general, for concerns about the VMU, it is valuable to get the input of the VMU Supervisor about anything that might not be apparent to the semiannual inspectors. If Ted and Dr. Spring had spoken with Autumn instead of just leaving her a note, she could have explained about the planned disconnection and relocation of the animals. Then they would have been able to provide Anne Marie with more complete information, which she could have provided to the entire IACUC. By following up with Autumn while they were reviewing the observations of the facility inspectors, the IACUC could then also have learned from Autumn that she had called Facilities Management to alert them to the overheating, and requested that they expedite the work order. The IACUC might also consider asking the Chief of Engineering or designee to attend an IACUC meeting to explain how the Building Management System works and their handling of the situation in question.

In general, when the Building Management System has to be turned off for rooms occupied by animals, it's important to monitor those rooms locally to detect and promptly address temperature excursions. If dangerous temperature excursions are detected, it is the responsibility of whoever notices, to act immediately to address the danger. Appropriate actions would include immediately alerting the VMU Supervisor, other VMU staff personnel, and the AV, so they can all work together to move the animals out of the hot room as quickly as possible. Engineering should also be notified as soon as possible. It would also have been appropriate for Anne Marie to ask whether there were any immediate actions needed, when she became aware of the problem.

Remember that the point of the semiannual inspections is not to catch as many infractions as possible, but to check on whether things that come up are being addressed as they should be and to facilitate improvements that may be needed.