



MEMO

To: All Campus Investigators using animals in research or teaching at the University of Wisconsin-Madison, Deans, Center Directors, Animal Facility Managers, Animal Care Supervisors, Animal Care Staff

From: John D. Wiley, Chancellor
Martin Cadwallader, Vice Chancellor for Research

Re: Reiteration and Clarification of UW-Madison Policy Relating to the Authority of Attending Veterinarians

Date: February 13, 2004

Recently we charged a committee, chaired by Dean Daryl Buss, with reviewing issues that impact the delivery of veterinary care on campus. In their report, the *Ad Hoc* Committee to Review Veterinary Aspects of the UW-Madison Campus Animal Care and Use Program noted that “the authority granted to the LAV (laboratory animal veterinarian), directly and through the ACUC (Animal Care and Use Committee), is often regarded less as an official authority based on position and responsibility than as authority within the limits permitted by the attitude, tradition, and immediate issues of the individual investigator, department or larger unit.” They further reported “there is a divergence of perception across units as to whether or not UW-Madison LAVs have such authority.”

The purpose of this memo is to reiterate the campus policy with respect to veterinary authority and to correct any misperceptions as to its scope and application. The official campus policy on the authority of laboratory animal veterinarians is defined in the attached policy statement.

In addition, we are announcing that Associate Vice Chancellor for Research Policy Tim Mulcahy has been delegated full institutional authority to act on behalf of the University to ensure compliance with this policy and all other university and federal policies and regulations related to the care and use of animals on campus. The Associate Vice Chancellor will work with IACUCs, campus facilities, and all responsible administrative units in the course of discharging this authority. However, the Associate Vice Chancellor is authorized to make ultimate decisions affecting the University’s animal welfare assurance and compliance with federal regulations.

UNIVERSITY POLICY ON VETERINARY AUTHORITY

The Animal Welfare Act (2.33.a.2) stipulates “each research facility shall ensure that the attending veterinarian has appropriate authority to ensure the provision of adequate veterinary care and to oversee the adequacy of other aspects of animal care and use.” Section 2.33.b (1)-(5) of the Act define the elements of “adequate veterinary care” for the purposes of the federal regulations. In keeping with the requirements of the Animal Welfare Act, attending veterinarians at the University of Wisconsin-Madison have the authority to require actions that in their professional judgment are necessary to:

1. Assure that facilities (including animal physical environment and environmental enrichment), equipment, and services (including behavioral management, husbandry, population management, nutrition, sanitation and hazard abatement) present at or provided by any animal facility are adequate to insure an appropriate level of animal care and personnel safety.
2. Assure that personnel are appropriately trained in the provision of animal care, the safe conduct of animal research, and the conduct of approved research or teaching involving animals.
3. Assure that procedures for animal procurement and transportation are appropriate and provide oversight and guidance for quarantine, stabilization and separation of animals.
4. Assure the presence and appropriate use of methods to prevent, control, diagnose, and treat diseases and injuries, including those that may be associated with research or teaching. This includes (a) the development and use of effective channels of communication among the veterinarians, animal care staff, and investigators, (b) the establishment of appropriate health monitoring practices, and (c) the development of adequate and accessible medical, husbandry, experimental, and teaching records. This provision also requires that the attending veterinarian has the authority to direct and/or provide for appropriate medical care, including euthanasia, as necessary and consistent with established veterinary practice.
5. Assure that there exist mechanisms of direct and frequent communication regarding daily observations of animals, so that timely and accurate information on problems of animal health, behavior, and well-being is conveyed to the veterinarian.
6. Assure that principal investigators and other personnel involved in the care and use of animals understand and employ appropriate handling, immobilization, anesthesia, analgesia, tranquilization, and euthanasia of all animals used in research or teaching.
7. Assure the provision of adequate pre- and post-procedural animal care in accordance with current established veterinary medical and nursing procedures.

Furthermore, attending veterinarians are authorized to intercede in any activity involving the use of animals for research or teaching purposes which in their judgment jeopardizes animal welfare or compliance with federal or university policies.

This policy supercedes any local policies or practices related to the authority of campus laboratory animal veterinarians. Compliance with this policy is required of all campus investigators, facility managers, animal care supervisors, animal caretakers, all departments, college units, IACUCs and animal facilities as a condition for retaining the privilege to work with animals at the University of Wisconsin-Madison. No individual or unit using animals for research or teaching at the University of Wisconsin-Madison is exempt from this policy.



We the undersigned voting members of the All Campus Animal Care and Use Committee concur with the Report to the Institutional Official of the Fall 2007 Seminannual Program Review.

N.J. Benevenga

N.J. Benevenga

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Janet Welter

Janet Welter

Date of Review: 12/7/2007

Research Animal Resources Center

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UW-Madison Animal Care and Use Program 1-24-08
Semi-annual Program Review, Fall 2007
All Campus Animal Care and Use Committee

Introduction:

Institutional animal care and use committees are legally required to inspect all animal facilities and use areas and to evaluate the Animal Program twice a year. This review is summarized in a report that must note any minor or significant deficiencies, and provide a plan and time line for correcting those deficiencies. It is important to note that significant deficiencies not corrected within 15 days after the established time line must be reported to federal agencies.

Process:

The All Campus Animal Care and Use Committee (ACACUC) has adopted a Program Definition (see RARC website at <http://www.rarc.wisc.edu> and click on Animal Care Program) to provide evaluation standards. A worksheet was prepared based on the Program definition, and used as the Program evaluation tool (see RARC website at <http://www.rarc.wisc.edu> and click on Program Review Worksheet). Each individual unit's ACUC reviewed its own program, and then comments from all committees were collated and examined and discussed by the ACACUC. This committee identified deficiencies at its December meeting and established corrective actions and timelines. To fulfill other responsibilities, each ACUC also inspected facilities and animal use areas, identified deficiencies, and initiated corrective actions and is following through on ensuring those corrective actions are completed.

Attachment: The completed worksheet showing all committees' findings, including the ACACUC's findings of deficiencies.

Summary:

The following text summarizes deficiencies, recommended corrective actions, and correct-by dates. Organization follows that of the worksheets. The material in italics represents findings from the Fall 2007 Program Review.

I. Physical Plant. *Within this category, 5 deficiencies continue to be identified and monitored for progress toward correction.*

- 1. In the past there has been inadequate veterinary, ACUC, Program staff, and PI input into animal facility planning, design, and construction. Proposed resolution: NAME developed and presented the Coordinated Animal Facilities Program (CAFP) to the Research Policy Advisory Committee (RPAC). If approved this will mean that an animal program staff member will be appointed to future new or remodeling animal facility committees. This remains a minor deficiency until enacted. Correct by date July 8, 2008.*

2. *Appropriate performance standards are not always met in animal facility planning, design, and construction. Proposed resolution: Acceptance of the CAFP should be a first step in developing performance guidelines to address this concern. Minor deficiency correct by date July 8, 2008.*
3. *Appropriate performance standards are not always met in animal facility maintenance. Proposed resolution: NAME from RARC has a working understanding of facilities and is compiling a list of rooms and identifying maintenance needs which should help address this problem. He participated as time permitted as a team member of facility inspection teams in the fall inspections. Minor deficiency correct by date July 8, 2008.*
4. *Limited small animal quarantine space continues to be a deficiency. Proposed resolution: NAME is developing a plan to utilize space in the Biotron to address this concern. Application of the term Specific Pathogen Free (SPF) to the facility will require clarification. This problem will be reevaluated in the spring 2008 facilities inspection. Minor deficiency correct by date July 8, 2008.*
5. *There is a lack of standards for evaluating laboratories and procedure rooms. RARC was asked to develop standards for evaluating laboratories and procedure rooms. Not yet done. Minor deficiency correct by date July 8, 2008.*

During the fall review, the committee evaluated progress on 1-5 above. Members noted continued improvement in all areas, but recommended maintaining their status as MINOR deficiencies. Correct by: 7-8-08. Proposed resolution: Reevaluate progress in the spring of 2008.

II. Animal Environment, Housing, and Management. *Within this category, no deficiencies were identified in fall 2007.*

III. Personnel Qualifications and Training. *Within this category, no deficiencies were identified in fall 2007.*

A concern was raised that Physical Plant tradesmen in the various divisions have not been equally open to animal safety training.

IV. Occupational Health and Safety. No deficiencies were identified.

A concern was raised that no faculty chair had been identified at the time of the AC ACUC meeting to be the chair of the Occupational Health and Safety Committee.

V. Veterinary Medical Care. *Within this category, no deficiencies were identified in fall 2007.*

VI. Institutional Animal Care and Use Committee. *Within this category, no deficiencies were identified in fall 2007.*

Support for cross-training of ACUC members was again discussed with the suggestion that trial appointments be implemented during the spring semiannual inspections.

VII. Institutional Official. No deficiencies were identified.

The committee reiterated its concern that the IO does not have direct access to funds thus impacting the ability of the IO to address programmatic needs.

VIII. Program Integration. *Within this category, 2 deficiencies were identified in fall 2007.*

1. *MINOR deficiency: there remains a need for improved communication among Program administration. Correct by date July 8, 2008*
2. *MINOR deficiency: financial resources and mechanisms for distribution are not adequate. Identification and prioritization of program needs remains ad hoc. Proposed resolution: Drs. *NAMES* will address this deficiency as they examine program funding structure from the campus perspective and recommend reforms to the Chancellor and others. Correct by July 8, 2008.*

During the fall review, the committee evaluated progress in addressing 1 and 2 above. It determined that each remains a MINOR deficiency. Correct by: 7-8-2008. Specifically, the committee requested development of a more detailed facility strategic plan and that assessment of campus program funding issues be completed by this date.

IX. Support of the Institutional Mission. No deficiencies were identified.