

UBC ANIMAL CARE COMMITTEE POLICY 014

Policy on Post Approval Monitoring (PAM)

Date Originally Approved: May 26, 2009

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Purpose:

The Canadian Council on Animal Care (CCAC) requires that all academic institutions that work with animals in science (research and teaching) establish procedures for post-approval monitoring (PAM) to ensure protocols are applied in practice as approved in principle by the ACC and that facilities meet CCAC and ACC requirements.

The purpose of this Policy is to meet this requirement and to describe the UBC PAM Program.

Scope:

This Policy applies to all UBC Persons who work with animals.

Definitions:

Animal Care Committee (ACC): the local representative of the CCAC responsible for overseeing all aspects of animal ethics and care, including determining, and working to correct, breaches of compliance with approved animal protocols and applicable standard operating procedures (SOPs).

The Canadian Council on Animal Care (CCAC): the national peer-review organization responsible for setting, maintaining and overseeing the implementation of high standards for animal ethics and care in science throughout Canada.

Non-compliance (is defined as per Policy 001): occurs when any UBC Person is found in breach of their ACC approved animal protocol(s), CCAC, UBC, ACC policies and guidelines, or other regulatory requirements.

Post Approval Monitoring (PAM) Program: a CCAC required institutional program to ensure all UBC persons involved in the use of animals in science adhere to all applicable CCAC, institutional, and regulatory requirements.

PAM Audit: risk-based review of facility(s), protocol(s) held by PI(s) or procedures within UBC ACC approved protocols.

PAM Team: those persons delegated the authority by the ACC to audit and review UBC ACC approved animal protocols and animal facilities.

Principal Investigator (PI): person who holds the approved ACC animal protocol(s) for the activity(s) in question.

UBC Persons: those participating in scholarly activity, including full-time and part-time faculty, staff and students and volunteers (including, without limitation, clinical faculty, visiting professors and any persons enrolled in any degree, non-degree, diploma, certificate granting or residency programs at UBC) or any person who teaches, conducts research, or works at, or under the auspices of UBC.

Work with animals: all research or teaching involving animals conducted under UBC ACC approved protocols.

Policy Statements:

1. All UBC ACC approved animal protocols and animal facilities are subject to PAM Audits as part of the regulatory requirements of the CCAC accreditation process.
2. Continued protocol approval and renewal are subject to full cooperation with the PAM Program, and maintaining compliance as per UBC ACC Policy 001 (Compliance).
3. Principal Investigators (PIs) working with animals under the auspices of UBC must ensure:
 - a. all UBC Persons working under their animal protocol(s) are aware of, and comply with, their approved animal protocol(s)
 - b. all UBC Persons working under their animal protocols are aware of, and comply with, the PAM Program.
4. Issues identified through PAM Audits must be resolved as per UBC ACC Policy 001, Policy 004 (Animal Health and Welfare Concerns: Treatment and Humane Endpoints (2016)) and this Policy (014).
5. The PAM Team must report all potential or identified non-compliance to the PAM Subcommittee and ACC as per this policy (014).
6. The PAM Subcommittee and/or ACC must review, respond to and resolve all issues of identified non-compliance.

Responsibilities and Authorities:

1. ACC: implement and enforce policies to ensure compliance with any requirements necessary to maintain accreditation with the CCAC, including the authority to approve, monitor and intervene in any work with animals conducted under UBC ACC approved animal protocols.
2. Facility manager(s): supervise the daily operations of the animal facility, staff, and students; manage the acquisition, care and welfare of the animals housed at the facility; provide technical services and training; monitor adherence to approved protocols, procedures and policies; and report non-compliance issues as per ACC Policy 001 (Compliance).
3. PAM Subcommittee: develops, reviews and implements the PAM Program.
4. PAM Team: performs ongoing review of approved animal use protocols, procedures, and facilities to ensure that all procedures conducted on animals conform to the ACC approved version of the protocol, ACC and CCAC policies and guidelines, and reports findings to the PAM Subcommittee and/or ACC.
5. PI: ensures that all UBC Persons working with animals are listed on, and knowledgeable about, UBC ACC policies and guidelines, his/her approved animal protocol(s) and applicable standard

operating procedures, that they have received the appropriate training, and that they will cooperate and comply with the PAM Program.

6. Veterinarians: provide clinical veterinary services and research support, and collaborate with the PAM Team to prevent and/or correct deficiencies related to Policy 004 and Policy 017 (Monitoring of Animals Used for Research, Teaching & Testing (2015)).

Process:

The UBC PAM Program consists of multiple levels of oversight, involving the PAM Team, Facility Managers, PIs, the ACC, and the PAM Subcommittee.

1. The PAM Team: performs audits which are prioritized based on risk to animal health and welfare, including but not limited to, category of invasiveness (COI), species, procedures and previous issues with compliance or monitoring. These audits may be facility, PI or procedurally based; informal or formal; scheduled or unannounced; random or ACC-initiated. All protocols and procedures therein, associated paperwork (monitoring records, drug logs, cage cards, etc.), animal facilities, laboratory, surgical and housing areas, and presentations (as for field protocols) are subject to auditing under the PAM Program.

Issues identified during PAM Audits, are classified as Major, Serious or Regular non-compliance based on risk to animal welfare:

- a. Major: immediate or significant risk to animal health and welfare
- b. Serious: potential risk to animal health and welfare or chronic issues.
- c. Regular: no, or unlikely to have any, risk to animal health and welfare

When non-compliance is identified during any audit, the PI and staff must deal with the issue(s) as directed by ACC Policy 004 or the PAM Team.

Improvements (commendations) and compliance issues noted during audits, and any actions required or taken to resolve them, are reported to the applicable UBC Persons (PI, research staff, Facility Manager or facility staff, Veterinarian, etc.) for follow up, logged, and regularly submitted to the PAM Subcommittee and ACC for review.

2. Facility Managers (or delegated animal care staff): submit monthly morbidity/mortality logs (as per Policy 004), as well as monthly and annual PAM facility checklists to the PAM Team.
3. PIs: must address audit findings in a manner satisfactory to the PAM Subcommittee and the ACC by the timelines given by the PAM team to maintain compliance, or the ACC may initiate noncompliance proceedings against the PI (see Policy 001). In any case where the PI disagrees with the resulting audit findings, they may appeal in writing to the ACC first, or subsequently to the office of the Vice President Research (VPR).

4. ACC: inspects all areas where animals are housed or used, visits each animal facility that is under UBC oversight at least once per year, and reviews protocol renewals. As part of the PAM Program, the ACC investigates issues of non-compliance as required (see Policy 001).
5. PAM Subcommittee: reviews reports from the PAM Team and other related documents, identifies and reviews ongoing trends within the program, makes policy and procedural recommendations to the ACC, and sets priorities for the PAM Program.

References:

- Post Approval Monitoring Subcommittee Terms of Reference
- UBC Animal Care Committee Terms of Reference
- The Canadian Council on Animal Care (<http://www.ccac.ca/en/>) and applicable documents:
 - CCAC policy statement for: senior administrators responsible for animal care and use programs, 2008, section 5.8 and, Appendix IV, section 8
 - CCAC Terms of Reference for Animal Care Committees, 2006, Section 2. Authority
- Applicable UBC ACC Policies (<https://animalcare.ubc.ca/>)
 - UBC ACC Policy 001 Compliance
 - UBC ACC Policy 004 Animal Health and Welfare Concerns: Treatment and Humane Endpoints (2016)
 - UBC ACC Policy 017 Monitoring of Animals Used for Research, Teaching & Testing (2015), and appendices

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