

Notice of Occupational Health Form Completion Requirement for Personnel Listed on IACUC Protocols

To: All IACUC Investigators

From: IACUC

Date: September 11, 2009

This notice is to inform investigators of a change in processes for the occupational health requirement for individuals working with animals.

Federal regulations require a health and safety program as part of our overall animal care and use program. To meet this requirement all personnel working with animals must complete a baseline and annual occupational health form.

Currently, the IACUC office provides reminders sixty and thirty days prior to the form's due date to allow sufficient time for completion of this requirement. If an individual working with animals fails to complete the required form, this lapse is caught at the time of a protocol's continuing review and the release of the continued approval is contingent upon (1) that individual's completion of the form or (2) removal of that individual from the protocol. This sometimes results in suspension of research activities at the time of the continuing review.

The Committee will now enforce completion of this requirement when an individual's form is due rather than with the protocol's continuing review. This will allow the protocol to continue without interruption, maintain our compliance with this requirement, and help the IACUC to maintain a current list of personnel for each protocol. If personnel have not completed the required form when it is due, the protocol will be suspended at that time.

We have revised our notification process to help avoid this type of protocol suspension. Individuals working with animals, as well as the PI for each protocol on which the individual is listed as personnel, will receive multiple email notices of this requirement. Our database will comb through those individuals requiring completions on a nightly basis, select those that are nearing their due date and an email will be sent directly from the system to the individual with a copy to each PI. These notices will be sent at 90 days, 60 days, 30 days, and finally 7 days prior to the form's due date.

The form may be submitted using the current instructions (interoffice with confidential stamp on outside of envelope), regular United States Postal Service, or the form may now be scanned and forwarded electronically to iacucrpo@uvm.edu.

If the individual has not completed this requirement, the protocols will be suspended and the animals moved to a holding protocol. OACM and the department chair will be notified of the suspension.

Given these new timelines and this improved notification process, we expect that no protocols will need to be closed for failure to comply with this requirement. It is important, however, that PIs keep their key personnel lists up-to-date. If someone leaves the lab, PIs should submit a key personnel change form so that that individual is removed from our database. The Request for Change in Personnel form has been modified so that PIs are able to remove a single individual from multiple protocols with just one form. If the individual is not removed from a protocol real-time, they may run through this entire process, resulting in possible unnecessary protocol suspensions.

Attention should be given to any emails PIs receive that include "IACUC Requirement" as these are the official reminders and the only notice that will be provided. In an effort to assist in maintaining compliance, we have developed a poster (attached) which outlines this requirement. Feel free to post where key personnel are most likely to see it.

Thank you for your attention to this administrative change. It is important that we all work together to maintain compliance with regulations regarding the use of animals in research, an area of heightened federal and public scrutiny.

****IMPORTANT****
OCCUPATIONAL HEALTH REQUIREMENT
for Individuals Working with Research Animals

The University requires that any individual working with animals be enrolled in the Occupational Health and Safety Program.

Enrollment into the program requires that you:

1. Initially, complete and submit the **Occupational Health and Safety Baseline Questionnaire**. This should be done prior to working with animals.
2. Complete and submit the **Occupational Health Annual Questionnaire** as long as you continue to work with animals. (Reminders will be forwarded to you and the PI via email at 90, 60, 30 and 7 days prior to the form's due date.)

These forms are located on OACM's forms page at <http://www.uvm.edu/~oacm/?Page=forms.html>.
Submission options are noted on the forms.

Note: If this requirement is not met on an annual basis, the protocol(s) on which you work are at risk for suspension.

If you are no longer working with animals or you plan to leave the institution, please contact iacucrpo@uvm.edu so that we may update our personnel database. Thank you.