Policy 13 Requirements for Personnel Training

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Policy 13.1 Requirement for Personnel Training

13.1.1 PURPOSE

In accordance with the Animal Welfare Regulations\(^1\) 2.32 (Personnel Qualifications), and the Public Health Service (PHS) Policy\(^2\) (IV.C.1.f.), the institution must ensure that all personnel who are involved with animal activities on behalf of the University of Hawai‘i (UH) are adequately trained and qualified to do so, and are knowledgeable of the regulations governing their use. In addition, the PHS Policy places responsibility with the institution for ensuring a safe working environment for personnel involved in the animal care and use program. The Institutional Animal Care and Use Committee’s (IACUC) role is to ensure that personnel conducting procedures on animals are appropriately qualified and trained in those procedures. In addition, the IACUC’s role is to ensure that personnel comply with health and safety requirements, including but not limited to, ensuring that personnel have received appropriate training\(^3\). Personnel training requirements are also expressed in the U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training.

13.2.1 RESPONSIBILITY OF PRINCIPAL INVESTIGATORS (PI)

Appropriate qualifications or a plan for receiving appropriate training, and completion of the training must be documented for personnel listed on a protocol, including the PI of the project who may not handle animals, prior to IACUC protocol approval.

13.3.1 SCOPE

Review of Regulations

Review of regulations will be accomplished by either in-person training by the University Veterinarian or designee, or by completing the required on-line Collaborative Institutional Training Initiative (CITI) modules. Personnel listed on an IACUC protocol must complete:

- The initial CITI training module Working with the IACUC, available on-line at www.citiprogram.org.
- Species specific modules for species listed on the protocol.

\(^1\) Animal Welfare Act and Animal Welfare Regulations, as of November 6, 2013, Title 7, Chapter 54, sections 2131-2159.
\(^2\) Public Health Service Policy on Humane Care and Use of Laboratory Animals, 2015, Office of Laboratory Animal Welfare, National Institutes of Health, NIH Publication 15-8013.
\(^3\) Institutional Animal Care and Use Committee Guidebook, 2nd edition, 2002, Office of Laboratory Animal Welfare, National Institutes of Health, Bethesda, MD
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- **Aseptic survival surgery** for all personnel on a protocol, no matter what species, if the protocol involves survival surgery.
- **Post-procedure care of mice and rats in research: minimizing pain and distress** module, for protocols involving rodents listed under pain USDA category D or E.

Personnel who have written documentation that they have completed CITI or equivalent training at another institution within the current triennium, may use this to satisfy this requirement.

**Review of Regulations Re-certification**

Recertification of the review of regulations for project personnel listed on a protocol, who have completed the initial review of regulations, is required every three years and must be current for full and annual renewal of protocols covering the animal activities. Recertification will be accomplished by completing the on-line CITI refresher *Work with the IACUC Refresher.* Assurance that re-certification has been completed will be verified during the IACUC protocol review process.

Personnel listed on a protocol who have not completed the initial review of regulations, re-certification, or other required CITI modules are not permitted to participate or engage in procedures that impact or affect animal subjects. Only when training is confirmed will they be allowed to continue to participate in animal activities covered by an approved IACUC protocol.

**Care and Use of Animals**

Qualifications of personnel will be described by the PI on the protocol form. The IACUC will determine whether the qualifications are adequate for the proposed activity. If personnel are not trained for the proposed procedure using animals, the PI must provide a plan that meets IACUC approval, as to how training will be accomplished.

**Protocol-Specific Training**

Didactic Online Training is required prior to working in an Animal and Veterinary Services (AVS)-operated vivarium, personnel must watch training videos and pass the corresponding online quizzes. Training requirements are described in the *IACUC Policy on Documentation of Training in Biomedical Research Techniques.* In addition, personnel listed on protocols involving the faxitron, non-standard ultrasound, microbubbles, and other procedures, may be required to demonstrate proficiency during post approval monitoring and/or on a case by case basis.

During annual review of a protocol, the PI must document any relevant hands-on protocol-specific training that each person has completed during the year.

**Training for Individuals Listed on an Approved IACUC Protocols and Who Require Access Into Animal and Veterinary Services (AVS) Operated Vivaria**
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- All personnel listed on an approved IACUC protocol and who require access into an AVS-operated biomedical vivarium must complete review of educational materials provided by AVS on procedures and policies for the vivaria. Personnel will complete an assessment tool with a passing score to demonstrate they have comprehended the information. This will be followed by an in-person orientation of the vivarium, scheduled through AVS. Satisfactory completion of vivarium training and the Occupational Health and Safety training, described below, will be required before access is granted to AVS-operated vivariums.

Occupational Health and Safety (OHS) Training

- All individuals listed on an approved IACUC protocol and who require access into an AVS-operated biomedical vivarium must complete review of OHS educational materials provided by AVS on hazards associated with the vivariums. Personnel will complete an assessment tool with a passing score to demonstrate they have comprehended the information. Personnel will be required to complete OHS refresher training annually during the AVS vivarium orientation refresher training. In addition, individuals must be enrolled in the Occupational Health and Safety Program for entry into the AVS operated vivariums. Requirements are found at https://researchcompliance.hawaii.edu/programs/animal-veterinary-services/occupational-health-safety-program/

- All individuals listed on an approved IACUC protocol or involved in an IACUC exempt activity that involves exposure to potential zoonoses (diseases that can be transmitted from animals to humans) will be required to complete protocol specific zoonoses training before working independently or prior to the annual review of the protocol, whichever occurs first. The University Veterinarian or designee will provide training materials to the PI to share with personnel listed on his/her protocol. The PI will be responsible to provide names of personnel and dates to the University Veterinarian of those who have completed the zoonoses training.

A written zoonotic exposure plan should be a part of the project’s overall occupational health and safety plan (zoonoses, chemical safety, microbiologic and physical hazards, hazards associated with the experimental procedures, handling of waste materials, personal hygiene), and may be audited during UH IACUC and IBC inspections. The PI must ensure that individuals involved with the animal activity receive training on the OHS plan. All training should be documented in writing.

Training for Volunteers, Students, and Workshop Participants Handling or Using Animals on a UH IACUC Protocol, But Not Included on the Protocol

In many cases, volunteers, students, or workshop participants will not need to be included on a PI’s protocol, if they meet certain criteria (see UH IACUC Procedure on Volunteers, Students, and Workshop Participants Handling or Using Vertebrate Animals on UH IACUC Protocols). PIs must ensure these personnel are educated on 1) federal and other applicable requirements for humane care and use of animals, and 2) protocol-specific animal handling procedures they will
be involved in. PIs may choose to use the appropriate CITI training modules found at citiprogram.org to educate those participating on their protocol. The PI will sign off as the responsible person, and maintain a log of those participating on the protocol, including dates they were educated, educational materials provided, and type of education or certifications personnel received. This information must be available upon request by the UH IACUC. The UH IACUC reserves the right to require additional information on a case-by-case basis.

Personnel should be trained on pertinent occupational health and safety relevant to their participation in the protocol, including, but not limited to, any potential zoonoses. Zoonoses training will be administered as similarly described above for personnel listed on an approved IACUC protocol.

**Noncompliance**

Failure to comply with the policy disallows untrained personnel from participating or engaging in an approved IACUC protocol. If untrained personnel are observed and/or reported to have participated or engaged in animal activities covered by an approved protocol, the approval to conduct the activity may be revoked, the work suspended, and a formal investigation into the matter initiated by the IACUC.