Training Issues

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PHS Policy on the Guide and AWAR

This Policy requires that Assured institutions base their programs of animal care and use on the Guide for the Care and Use of Laboratory Animals and that they comply with the applicable regulations issued by the USDA under the Animal Welfare Act.

IV.A.1. Footnote 2
OLAW Training Guidance

**OLAW FAQ G1:** What kind of training is necessary to comply with PHS Policy and how frequently should it be provided?

The U.S. Government Principles, Health Research Extension Act of 1985 and the PHS Policy repeatedly refer to appropriately trained, qualified, and experienced personnel, and availability of instruction and training. The institution is responsible for the training of its staff. The size and nature of institutional research programs varies significantly and accounts for the corresponding variation in the scope and depth of instructional programs and the frequency at which they are offered.
FAQ G1 con’t.

• Ensure that individuals are trained and qualified in species-specific housing methods, husbandry procedures, handling techniques
• Ensure that research staff members performing experimental manipulation are qualified through training or experience to accomplish procedures humanely in a scientifically acceptable fashion
• Provide training or instruction in methods that minimize the number of animals required to obtain valid results, minimize animal distress
• Ensure that staff whose work involves hazardous agents have training or experience to assess potential dangers and select and oversee the implementation of appropriate safeguards
• Ensure compliance with any initial and continuing education regarding State requirements for the licensing of veterinary or animal health technicians.

Condensed from http://grants.nih.gov/grants/olaw/faqs.htm#instresp_1
USDA Training Requirements

Animal Welfare Act and Regulations (AWARs):

“Training of scientists, animal technicians, and other personnel involved with animal care and treatment at research facilities...

Each research facility shall provide for the training of scientists, animal technicians, and other personnel involved with animal care and treatment in such facility...” (Sec. 2143 (d))
What is a Best Practice?

• Best practice is a method that has been shown to achieve superior results and is used as a benchmark.

• The guidance in this webinar represents current thinking and experience and draws on best practices followed by the biomedical research community.
Guidance Regarding Best Practices

• Unless specific statutory or regulatory requirements are cited, this information should be viewed as recommendations.

• A recommendation may not be suitable or applicable to every institution.

• An Assured institution may use an alternative approach if the approach satisfies the requirements of the PHS Policy.
Training Issues

Minimum Requirements and Best Practices
Training Issues

- **WHO?** - Personnel to include in training
- **WHAT?** - Training topics
- **HOW OFTEN?** - Frequency of training
- **HOW?** - Methods of training
- **DOCUMENTING** - Documentation of training activities
- **EVALUATING** - Evaluating the effectiveness of training
Why Training is Important

• “Laboratory animal science and medicine are rapidly changing and evolving disciplines.”

• Helps ensure high quality science is conducted and animal well-being is prioritized

• Facilitates compliance with the Program
Considerations for Training Programs

(*Guide*) Qualifications of personnel required to conduct and support an animal program depend on:

- Type and size of the institution
- Administrative structure for providing adequate animal care
- Characteristics of the physical plant
- Number and species of animals maintained
- Nature of the research, testing, teaching, and production activities
Personnel to Include in the Training Program

PHS Policy:

• Those responsible for housing, feeding, and care of animals
• Those conducting procedures on live animals
• Institutional Animal Care and Use Committee (IACUC) members

AWARs: Closely echoes wording in the PHS Policy

Guide: Indicates “all personnel involved” with animal care and use
Personnel Categories in the *Guide*

Chapter 2, Personnel Management, Training and Education:

- Veterinary and other professional staff
- Animal care personnel
- The research team
- The IACUC
Other Personnel to Include in Training

• Institutional Official
• Occupational health and safety
• Administrative
• Animal transportation
• Facilities
• Emergency management
• Human resources management
• Legal professionals
Training Topics: Considerations

**PHS Policy:** General requirements

**AWARs:** More specific criteria (but still general)

**Guide:** “Must” and “Should” statements are used
## Personnel Training Topics

<table>
<thead>
<tr>
<th>Training Topics</th>
<th>AWARs</th>
<th>PHS Policy</th>
<th>Guide Must</th>
<th>Guide Should</th>
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</thead>
<tbody>
<tr>
<td>Training, education, experience to conduct activities involving animals</td>
<td>All relevant personnel</td>
<td>All relevant personnel</td>
<td>All relevant personnel</td>
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</tr>
<tr>
<td>Basic principles, ethics and humane/proper practice of animal care, use, maintenance</td>
<td>All relevant personnel</td>
<td>All relevant personnel</td>
<td>All relevant personnel</td>
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<tr>
<td>Three Rs: Replace, Refine, Reduce</td>
<td>All relevant personnel</td>
<td>All relevant personnel</td>
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<td>Research team</td>
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<tr>
<td>Specific procedures</td>
<td>All relevant personnel</td>
<td>All relevant personnel</td>
<td>Veterinarian, Research team</td>
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<tr>
<td>Veterinary/Laboratory animal medicine</td>
<td>Veterinarian</td>
<td>Veterinarian</td>
<td>Veterinarian</td>
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<tr>
<td>Housing, feeding, non-medical care of animals</td>
<td>Veterinarian or scientist</td>
<td>Veterinarian or scientist</td>
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<td>Animal care</td>
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<tr>
<td>Signs of pain/distress</td>
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<td>All relevant personnel</td>
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<td>Humane endpoints</td>
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<td>All relevant personnel</td>
<td>Veterinarian, Research team</td>
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<tr>
<td>Reporting concerns</td>
<td>All relevant personnel</td>
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<td></td>
<td>Research team, Other relevant personnel</td>
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</tbody>
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<td>Contingency/Disaster plans</td>
<td>All relevant personnel</td>
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<tr>
<td>Animal facilities and access</td>
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<td>Veterinarian, IACUC, Other relevant personnel</td>
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<tr>
<td>Occupational health and safety concerns</td>
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<td></td>
<td>Research team, Other relevant personnel</td>
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<tr>
<td>Institutional Program</td>
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<td>Research team, IACUC</td>
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<tr>
<td>Animal care and use legislation, regulations, guidelines, policies</td>
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<td>Research team, IACUC</td>
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Frequency of Training

**PHS Policy:** Leaves it up to the individual institution

**Guide:** Multiple “should” statements are used

**AWRs:** Review of qualifications with “sufficient frequency”

**Other possible requirements:**
- Formal education requirements
- State and local laws
Frequency of Training

Categories of frequency:
1. Initial training
2. Ongoing/continuing education
3. Interim (timely) notifications

“Should” undergo continuing education (Guide):
• Veterinary and other professional staff
• Animal care personnel
• Research team
• The IACUC

Best practice:
• Perform a risk assessment for all personnel
• Base on performance standards
Training Methods: Considerations

PHS Policy and AWARs: Training must be provided, and adequate training and experience ensured

Guide: Multiple “should” statements are used

Best practice considerations

- One size does not necessarily fit all
- Defined what is necessary and how it can be achieved
- Collaborative effort
Methods of Initial and Continuing Training and Education

• Formal education (degree or non-degree)

• On-the-job

• Employee orientation

• Verified by Memoranda of Understanding agreement
Methods of Initial and Continuing Training and Education

• Laboratory animal science meetings and workshops

• Webinars

• Institution-sponsored seminars

• Self-guided study
Methods of Timely Notification

• Posted signage

• Email notifications

• Text message notifications

• Institutional website
Documenting Training: Animal Welfare Assurance and Animal Use Protocol

**PHS Policy:** The written assurance must describe “the qualifications” of the veterinarian as well as “a synopsis of training” of personnel.

**Guide:** The animal use protocol should describe the “adequacy of training and experience of personnel in the procedures used, and roles and responsibilities of the personnel involved.”
Other Documenting Considerations

**Guide:** “all Program personnel training should be documented”

Training that may not be documented in the animal use protocol:

- Personnel outside of the research team
- Animal care and use legislation, regulations, principles, etc.
- Contingency/disaster plans
- Occupational health and safety practices
- During post-approval monitoring
- Continuing education activities
Documenting: Methods and Maintenance

Methods of documenting:
- Paper-based systems
- Electronic systems (commercially available or home-grown)

Document maintenance:
- Know who is responsible
- Availability for review
- Duration (OLAW, local)
Evaluating the Effectiveness of Training

**PHS Policy:** Continuing review of ongoing activity

**Guide:** The IACUC is responsible for “evaluating the effectiveness of the training program.”

**AWARs:** One IACUC function is to make “recommendations to the Institutional Official regarding any aspect of...personnel training.”
Methods of Evaluating the Effectiveness of Personnel Training

- Semiannual program review
- Inspections and site visits
- Certification status
- Staff meetings
- Employee performance evaluations
- Audits
- Morbidity and mortality
- Post-approval monitoring
Methods of Evaluating the Effectiveness of Personnel Training

• Review of non-compliance events

• Quizzes

• Evaluation by IACUC leadership and IO

• Feedback from personnel

• Review of responses to unexpected events and practice drills

• Review of occupational health and safety-related incidents
Resources

• PHS Policy and OLAW FAQs
• Animal Welfare Act and Regulations
• *Guide for the Care and Use of Laboratory Animals, 8th Edition*
• Animal Welfare Information Center (AWIC)
• Laboratory Animal Welfare and Training Exchange (LAWTE)
• American Association for Laboratory Animal Science (AALAS)
• Institute for Laboratory Animal Research (ILAR)
• Guidelines from other countries may be useful considerations
Question 1

Many institutions depend on their PI’s to conduct some procedure specific training since they at times are the experts.
Regarding documenting the PI conducted training - is it adequate for the PI to include in a protocol that “personnel” will be trained on a procedure before beginning a procedure, or is there an expectation that the PI will keep a separate training log that specifically identifies (date, and sign-off by the trainer for example) when each technician was adequately trained?
The intensity of trainings can vary significantly from institution to institution.

How would you suggest evaluating the effectiveness of a training program?

Any suggestions on evaluation standards?
Question 3

Relating to establishing comprehensive training programs, any suggestions for small institutions with limited resources?
Question 4

One common sanction for noncompliant events is for the IACUC to require a PI to retake, for example, an online training course. If OLAW sees this sanction time after time from the same institution, would OLAW question the effectiveness of the training?
Question 5

Must all training be documented?
Question 6

Is it OK for the PI or a member of his staff to do some of the training?
Question 7

Should the IACUC look at training records during every semiannual inspection and program review?
Question 8

What if someone hasn’t completed the specific species training and starts to work with animals?

Is this reportable to OLAW?
Question 9

A collaborating surgeon whose specialty is human cardiology will be conducting an experiment using sheep at our institution. He claims he does not need training as he works on human subjects daily. Should we allow him to proceed without additional training?
Upcoming OLAW Online Seminars

• September 19, 2013 – Topic: TBD

• December 12, 2013 – Topic: TBD