



## **USDA Inspections**

I reviewed all available information about all USDA non-compliances that were included as part of the recent USDA investigation of the campus (as well as seven non-compliances that took place after the investigation concluded in June, 2016). During this time, USDA visited the campus 51 times and issued 22 reports, with no non-compliances in 6 of these reports. Of the 25 non-compliances in the remaining reports, 7 involved injury to, or death of, animals, and these will be the focus of this review. They are obviously the most serious incidents from an animal welfare perspective

prevent them from being moved. This particular monkey had never been seen to operate the squeeze mechanism, but it appears likely that she pulled the squeeze door forward and became trapped. Squeeze mechanisms in all cages are now locked to prevent an incident like this from occurring in the future.

*Section 2.38 (f)(1) Miscellaneous – careful animal handling (4 non-compliances)*

(2014) A lamb died during transport.

Campus findings and corrective action – The lamb was being transported with its mother to reduce stress, which is permitted under the Animal Welfare Act. Lambs had been transported in this way multiple times in the past without incident. In this case, the mother might have fallen on the lamb, causing the lamb's death, but the actual reason for the death could not be confirmed and it could have instead been due to the lamb's health condition. Regardless, lambs are now transported in a



size and decentralization of the campus animal care program, which created barriers to coordinated oversight and provision of animal care and veterinary care.

In response, the campus undertook major efforts to address several of the core issues that led to these findings. These included: 1) the construction or renovation of some animal facilities/support areas; 2) moving the “centralized” animal facility (now called the Teaching and Research Animal Care Services, TRACS) from the School of Veterinary Medicine to campus administration (Safety Services) and appointing the AV as TRACS director; 3) improving consistency of the veterinary care program/veterinary oversight via a number of different mechanisms (e.g. reporting systems, campus-wide standard operating procedures, establishing and/or subsidizing more centralized veterinary care provision [for example for rodent health surveillance]; 4) increasing the size of the IACUC staff and hiring a dedicated IACUC Administrator, which allowed for the implementation of a post-approval monitoring program, laboratory inspections, and hands-on training programs for investigators; 5)

decade in response both to AAALAC findings and evolving standards and practices within the animal research community.

The summary statistics in the UC Davis IACUC Annual Reports I reviewed indicate that deficiencies overall have decreased during this period of increased monitoring. The number of deficiencies identified in the animal facilities decreased from 2 to 1 per inspection from 2008 to 2016, while deficiencies in laboratories and study areas decreased from 0.8 to 0.1 during that same period. Deficiencies found during post-approval monitoring have not decreased (staying at about 0.8), but this is perhaps not surprising given that these inspections are mainly directed towards protocols that have already been identified by the IACUC as posing higher risk or because of already-identified issues. I reviewed the detailed findings in the last three years of semi-annual inspections, and the vast majority of the deficiencies found in the animal facilities, laboratory and

It is important to note that all of the non-compliances discussed above in the USDA reports were actually first identified by UC Davis, not by USDA. These were then self-reported by UC Davis either to OLAW (which requires such reporting for serious incidents involving federally supported research, and which informs USDA of these reports if they involve regulated species) and/or to USDA directly (although USDA does not require such self-reporting). Based on my experience evaluating programs for animal care nationally and internationally, the responses of UCD to these animal injuries and deaths were consistent with best practices in the animal research community and indicate that the campus has a

Recommendation 2: Review processes and procedures for USDA regulated species.

Given the decentralized nature of the UC Davis animal care program, aspects of housing and care for regulated species may be made at the department or college level rather than centrally. This could lead to different standards across campus and potentially to risks for future non-compliance with USDA. I therefore recommend that the IACUC be charged with evaluating policies and procedures for regulated species