

- A follow up Quality Assistance Program (QAP) assessment visit may be warranted to ensure good practices and the execution of corrective measures.
- Failure to take appropriate action to Quality Assistance Advisor Recommendations will require escalation to the Facility Animal Care Committee and/or Senior Administration for consideration of further actions. Consequences may include revoking facility access, suspension of Animal Used Protocol and withholding of funds.

RECOMMENDATION LEVEL 4:

Applies to situations of immediate danger or impact to animal welfare or to the safety of personnel and requires immediate action due to its severity.

Immediate response and corrective action is required.

NOTE: Level 4 incidents will be immediately brought to the attention of the Principal Investigator (if a trainee) or supervisor (if an employee), FACC Chairperson and veterinarian and will follow the directives of the CCAC on [Reporting Major Animal Welfare Concerns](#), *item 3 on page 4*.

Examples:

Animal Welfare: Severe morbidity requiring immediate euthanasia (e.g. Unrelenting pain and/or distress, moribund state).

Personnel Health and Safety: Unprotected exposure to biocontainment level 3 infectious agents, carcinogens, radioisotopes/ Working with non-human primates without OHP participation and inappropriate PPE.

RECOMMENDATION LEVEL 3:

Applies to situations that present a potential danger to animal welfare or to the safety of personnel if not corrected in an expeditious manner. The actions planned by the Researcher/ Facility Delegate* in response to these recommendations must be specified, in writing, to the Facility Animal Care Committee/ Quality Assistant (QA) within 7 days and corrective measure must be applied within 30 days.

Note: Timelines are assigned according to the gravity of the compliance matter and are determined at the discretion of the QAA and/or FACC.

Examples:

Animal Welfare: High potential for pain and distress amenable to treatment/ ignoring clinical endpoints (e.g. Body Condition Scoring of less than 2.0) can lead to moribund state.

Personnel Health and Safety: unprotected exposure to biocontainment level 2, toxic chemicals risk of injury (i.e. burns, cuts), absence of or inadequately stocked first aid kits.

RECOMMENDATION LEVEL 2:

Applies to situations that have no immediate threat to animals and humans but must be addressed in a timely manner in order for the Researcher/ Facility Delegate* to comply with McGill and CCAC policies and guidelines. A written response is not required unless specified and corrective actions must be applied within 3 months.

Recurring Level 2 non-compliance matters will be escalated to Level 3 and addressed as such.

Note: Timelines are assigned according to the gravity of the compliance matter and are determined at the discretion of the QAA and/or FACC.

Examples:

Animal welfare: Failure to use appropriate personal protective equipment (PPE)/Deficient record keeping/Minor deviation from McGill SOPs / Overcrowded cages/ Lack of necessary cage card information/ Inadequate aseptic technique.

Personnel Health and Safety: Ergonomic issues/ Material or equipment storage above eye level/ inappropriate storage of substances (i.e. Chemical cabinet), Expired certification or calibration of equipment (hoods, anesthetic machines,) Inappropriate use of PPE (containment level 1), Inaccessible safety data information(MSDS).

RECOMMENDATION LEVEL 1 (Optional):

Applies to optional changes aimed at enhancing animal care and welfare at McGill University, in accordance with CCAC policies and guidelines, promoting best practices and refinement of techniques

COMMENDATORY:

Applies to excellent conditions, practices (enhancing or optimizing animal welfare, reduction, refinement) or personnel.

* **Facility Delegate** Is used as a generic reference to the Facility Manager, Veterinary Care Manager, Veterinarian, and Director

OBLIGATIONS:

Principal Investigator: Responsibility to follow the above reporting requirements corresponding to Animal Use Protocol-related activities and provide the FACC with additional information (follow-up reporting) as warranted.

Facility Delegate: Responsibility to follow the above reporting requirements corresponding to Animal Facility -related activities and animal health cases, and provide the FACC with additional information (follow-up reporting) as warranted.

Quality Assistant Advisor: Assists investigators, research staff, students, veterinary and animal care staff, FACCs, and administrators in remaining compliant with animal care and use regulations, policies and guidelines (*McGill University Policy on the Study and Care of Animals*). Reports all animal-related activities to the local FACC and UACC.

Facility Animal Care Committee: Ensures the humane care and use of animals in research, teaching or testing, according to CCAC guidelines and policies and are responsible for monitoring compliance with approved protocols. The FACC has the authority to suspend any activity involving animals that does not comply with the applicable laws, regulations, policies and/or guidelines (*McGill University Policy on the Study and Care of Animals*).