

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 the Quality Assistance Program Recommendations will require escalation to the Facility Animal Care Committee and/or Senior Administration for consideration of further actions. Consequences may include but are not limited to, revoking facility access, suspension of Animal Use Protocol, and withholding of funds.

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

MAJOR RECOMMENDATION (Required):

Applies to an immediate and significant threat to animal health or welfare or to the safety of personnel for which immediate appropriate action is required.

NOTE: Major 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 Policy: Certification of ethical animal care and use program item 4 on page 4](#).

Examples:

- Animal Welfare: Severe morbidity requiring immediate euthanasia (e.g., Unrelenting pain and/or distress, moribund state).
- Insufficient or complete omission of analgesic
- 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.

SERIOUS RECOMMENDATION (Required):

Applies to situations that present a potential impact on animal welfare or 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 measures must be applied within 30 days.

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 a 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.

REGULAR RECOMMENDATION (Required):

Applies to situations that have no immediate threat to animals and humans but must be addressed in a timely manner 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 Regular non-compliance matters will be escalated to Serious 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).

MINOR RECOMMENDATION (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 clinical 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 APWOC.

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