



Policy on Tracking and Training Personnel Involved with Animal Activities

BACKGROUND

The Institutional Animal Care and Use Committee (IACUC) is charged with ensuring that personnel that care for or conduct procedures on living animals have appropriate qualifications, experience and training. To this end, the Principal Investigator (PI) is responsible for ensuring that all personnel (laboratory staff, instructors, teaching assistants, and students) using live vertebrate animals under their purview are appropriately listed or identified on the applicable animal use protocol. The PI must also ensure that all personnel are appropriately trained, informed of applicable regulatory requirements, and apprised of any hazards or risks prior to allowing personnel to engage in research activities.

DEFINITIONS

1. **Observers** may be in close proximity to animals during a research or learning activity but must not handle the animals or perform any procedures.
2. **Short-Term Personnel** are defined as individuals participating in a research or learning activity for 30 or fewer consecutive days (1 month) or 15 or fewer total days over a six-month period.
 - a. The intent is to permit an educational event, such as a visiting scientist sharing procedural knowledge or a summer student doing a rotation; the role of short-term personnel should not be used to fill employment gaps.
3. **Long-Term Personnel** are defined as individuals participating in a research or learning activity for more than 30 consecutive days (1 month) or more than 15 total days over a six-month period.
4. **U-M Affiliated Instructors/Demonstrators** are individuals whose primary animal activity is the leading of teaching activities or demonstration of animals or animal procedures.
5. **Minors** are defined as anyone under the age of 18.

POLICY

Requirements for mandatory training and enrollment in the U-M Animal Handler Medical Surveillance Program are based on type of personnel and procedures performed.

Observers:

- Not required to be listed on the animal use protocol.
- Not required to be enrolled in the Animal Handler Medical Surveillance Program.
- Not required to undergo mandatory training as described below.
- Must receive information on occupational health risks (e.g., zoonoses) and required PPE.
- Must be escorted at all times by a member of the Unit for Laboratory Animal Medicine (ULAM), the PI, or a member of the PI's staff who is listed on the protocol.



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Short-Term Personnel:

- Not required to be listed on the animal use protocol.
- A request for the addition of short-term personnel is emailed to the Regulatory Compliance Associate (RCA), which is reviewed and attached to their approved animal protocol within 1-2 weeks of class/activity start date. The submission of this request signifies the assurance of the PI that they will be responsible for training in lieu of the mandatory training requirement. The request should contain the following information about each participant:
 - U-M affiliated: Full name and unique name.
 - Non-U-M affiliated: Full name, title, experience, and name of affiliated institution.
 - Role in research/teaching activity at U-M
 - Expected duration/dates of animal activity
- Not required to be enrolled in the Animal Handler Medical Surveillance Program.
- Must receive information on animal use policies and protections, whistle blower policies, and occupational health risks (e.g. zoonoses) and required PPE provided by a representative of the ACUP, EHS, Training Core or the PI.
- Must work under the direct supervision of ULAM, the PI, or an experienced member of the PI's laboratory who is listed on the protocol and is proficient on all the applicable procedures.

Long-Term Personnel:

- Must be listed on the animal use protocol.
- Must be enrolled in the Animal Handler Medical Surveillance Program.
- Must undergo mandatory training as described below.

U-M Affiliated Instructors/Demonstrators:

- As instructors and demonstrators are responsible for instructing others in animal care, they are held to the training requirements of long-term personnel regardless of the length of their instruction.
- Must be listed on the animal use protocol.
- Must be enrolled in the Animal Handler Medical Surveillance Program.
- Must undergo mandatory training as described below.

Minors:

- PI must comply with the U-M Standard Practice Guide (SPG) *Policy on Minors Involved in University-Sponsored Programs or Programs Held in University Facilities* and the EHS *Minors in Research Laboratories* policy.
- Must be listed on animal use protocol according to level of involvement with animals listed above (e.g. short term, long term) and complete the given requirements.
- Minors should be restricted to performing procedures that are not expected to cause pain or distress in animals and that do not involve the use of anesthesia or analgesia.
- Cannot work with hazardous materials or potentially aggressive animals (e.g. primates, dogs, cats).



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- Must work under the direct supervision of ULAM, the PI, or an experienced member of the PI's laboratory who is listed on the protocol and is proficient on all of the applicable procedures.

Mandatory Training Requirements:

Training consists of an orientation, species-specific courses, and technique-specific sessions (including surgery and hazard containment procedures), which are provided via lecture, workshop, or web-based formats.

Required courses are assigned to individual personnel according to the species and procedures assigned to the individual in a protocol.

- Individuals must complete mandatory web-based training assignments prior to their approval on a new protocol or protocol amendment.
- Individuals must complete mandatory workshop training assignments within 60 days of assignment notification. If workshop training is not completed within this time frame, the individual's permission to work with the specific species or techniques covered by the incomplete training assignments will be revoked and they will be removed from the protocol. Individuals may work with animals under the direct supervision of laboratory staff during this 60-day time period.
- Training material content is continually evaluated and updated as needed to ensure that all information is current and accurate.
- Animal users are required to retake online courses (e.g. regarding species, surgery, hazardous material use) every 3 years.
- Provision of continuing education will further be achieved via newsletter articles, web postings, and direct email messaging to targeted personnel.

REFERENCES

1. U-M Standard Practice Guide (SPG) [Policy on Minors Involved in University-Sponsored Programs or Programs Held in University Facilities](#)
2. EHS [Minors in Research Laboratories](#) Policy
3. [U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training](#)
4. NRC (2010) The Guide to the Care and Use of Laboratory Animals. Washington, D.C. National Academies Press.
5. Federal [Animal Welfare Act and Regulations](#)

FURTHER INFORMATION

For questions, additional detail, or to request changes to this policy, please contact the Animal Care & Use Office (acuoffice@umich.edu).