

# **UM UCUCA PROGRAM FOR RECTIFYING SERIOUS OR ONGOING NON-COMPLIANCE IN THE MANAGEMENT OF UNIVERSITY ANIMAL CARE AND USE**

According to the *Guide for the Care and Use of Laboratory Animals (Guide)*, the regulations of the federal Animal Welfare Act (AWA), and the *Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals*, the University Committee on Use and Care of Animals (UCUCA) is responsible for the oversight and evaluation of the institution's animal care and use programs, procedures, and facilities. UCUCA must ensure that these programs, procedures, and facilities are consistent with applicable laws, regulations, policies, and nationally accepted standards (the combination of which hereafter referred to as "University standards"). In order to accomplish this charge, the UCUCA will follow the program outlined below when animal care and use programs and facilities are determined to be "at-risk" of serious or ongoing non-compliance based on past inspection records and performance.

## **Increased Frequency and Rigor of Inspection**

At-risk facilities and programs will be inspected at least monthly to ensure compliance with University standards. Inspection reports will be reviewed at the monthly UCUCA meetings. This approach will permit documentation of recurring deficiencies. Administrative units that operate animal care and use programs and facilities will be responsible for correcting deficiencies cited. Personnel responsible for at-risk programs and facilities will be required to present to the UCUCA an action plan, including time frames, for correcting deficiencies and preventing recurrences. The UCUCA Office will assist personnel in at-risk animal care and use programs and facilities by providing information and guidance in developing and implementing their action plan(s). Whenever possible, ULAM standard practice will be adopted as part of the action plan(s) developed.

## **Final Corrective Action**

The UCUCA will determine appropriate time periods for resolution of at-risk status. After this period, unresolved patterns of non-compliance will result in a recommendation from the UCUCA to the Vice President for Research that ULAM assume responsibility for the operation of programs and facilities that do not consistently comply with University standards at the cost of the administrative unit, or that such programs and facilities be decommissioned. In the case of serious deficiencies that threaten the health or well-being of the research animals, the ULAM Director will take immediate responsibility for care of the animals and operation of the programs and facilities.

## **Sanctions Against Individuals**

Flagrant and repeated failure to adhere to accepted standards of humane animal care and use, or to secure required approvals, is considered academic misconduct. Such misconduct will be reported to the Rackham School of Graduate Studies and/or the Office of the Vice President for Research, as applicable, and can lead to sanctions up to and including termination from the University.