When PACUC first established a policy on adding personnel to protocols, it was written with “personnel” defined as “...those who receive a paycheck from Purdue (e.g., faculty, staff), graduate students, animal care personnel, visiting scientists, and veterinary technicians/technologists.” One group that was not accounted for was undergraduate students who do not typically receive paychecks and may be working with animals voluntarily. As undergraduates were not specifically included in the PACUC policy, it has become an item of confusion, for several investigators, on who must be formally added to an approved protocol application, if that person must submit a qualification form to document their training and experience, and if they must attend the mandatory PACUC Orientation Program. The intent of this article is to clarify PACUCs' policy on this issue.

PHS (Public Health Service) Policy and the AWA (Animal Welfare Act) do not distinguish between different types of employees or students. Both the PHS and the AWA are clear in their policies that the IACUC (at Purdue, PACUC) is responsible for determining that personnel conducting animal studies are appropriately qualified and trained to perform them.

During two recent federal inspections of Purdue’s animal facilities, the USDA veterinary medical officer found separate incidences of personnel, who were not listed as personnel working on the project and who did not have a qualification form on file with PACUC, performing procedures on animals. Purdue was cited both times by the inspector as being in non-compliance in the area of Personnel Qualifications. The second citation was considered an item of Repeat Non-compliance and resulted in the University receiving a civil penalty from the USDA. To quote portions of the inspection reports, “There was no mention of this individual in the protocol that had been reviewed and approved by the IACUC...rendering a review of this individual by the IACUC impossible. It cannot be assumed, in the absence of any documentation to the contrary, and, in the absence of direct supervision, that this individual was qualified to perform this ... surgery as detailed in the approved protocol. This is a repeat violation of this section of the Regulations, having been cited in previous reports.”

Due to these citations of non-compliance, PACUC would like to clarify its policy regarding adding personnel to protocols and submission of qualification forms: (1) While personnel are undergoing training for the project and while they are being directly supervised by another qualified individual on the project, it is not required that they be listed on the approved protocol or have a qualification form on file in the PACUC office. (2) Personnel refers to all people who work with non-human, vertebrate animals in research, teaching, or testing regardless of whether or not they are in employment status at Purdue University. (3) Personnel must be added to an approved protocol when they begin work on a project in an unsupervised capacity and after their training has been completed and their qualifications documented in the PACUC office via an Animal Use Qualification Form. (4) All personnel who are working on an approved protocol must complete the PACUC Orientation Program. This may be attended in person (offered monthly) or completed online at: http://www.purdue.edu/Research/ORA/animals/login.shtml. The on-line version is more convenient for students as they do not have to take time out of their class schedule to attend in person.

For those who prefer to attend a session in person, please see the schedule below for the Spring 2003 semester.

January 14, 1:30-3:00, LILY 1-125
February 6, 1:30-3:00, LILY 1-125
March 4, 1:30-3:00, LILY 1-125
April 3, 1:30-3:00, LILY 1-125
May 6, 1:30-3:00, LILY 1-125
Adding Personnel cont...

For questions on this article or to register for one of the above orientation programs, please contact the PACUC office at pacuc@purdue.edu.

References:
2 National Research Council Guide for the Care and Use of Laboratory Animals, 1996.

Biohazard Burn-Up (Incinerator) Boxes
Article by Bob Golden, B.S.

Dead animals that have been used for research, teaching, or testing purposes are currently placed in plastic bags and usually stored in a freezer to await removal. Recycling and Refuse personnel are then required to transport these dead animals to ADDL. ADDL personnel remove the items from the plastic bags and place them in barrels prior to incineration. On many occasions, items such as surgery materials, including syringes and scalpels (i.e., sharps), have been improperly discarded with the dead animals. Unfortunately, removing the carcasses is very hands-on and has resulted in several occupational injuries to personnel from sharps.

Replacing the plastic bags with a product called a Burn-up Box can eliminate this potential hazard. These sturdy, corrugated boxes hold waste within a 2-mil polyethylene bag, ready for disposal. Colorful graphics and large symbols readily identify each box for proper usage. The tight-fitting lid has a covered flap opening to deposit material. When the box is filled, simply close the safety lid and the Recycling and Refuse personnel can safely transfer the box to the incinerator for direct disposal.

The Biohazard Burn-Up Boxes mentioned can provide:
- safe collection and containment of carcasses for incineration.
- fold-up design for easy storage (store flat) and easy assembly.
- a safety lid which closes for disposal.
- a cardboard container designed to be burned along with its contents.

These boxes are available from:
- Life Sciences Products Inc. (www.lspinc.com) Cat. # LS-797015 Bench Model (8x8x10)
- VWR Scientific Products (www.vwr.com) Cat. # 56617-810 Bench Model (8x8x10)
- Fisher Safety (www.fishersafety.com) Cat. # 12-009-8B Bench Model (8x8x10)
- Phone 1-800-245-5774 Cat. # LS-797005 Floor Model (12x12x27) Cat. # 56617-807 Floor Model(12x12x27)
- Phone: 1-800-932-5000
- Phone: 1-800-772-7702
- Cat.# 12-009-8A Floor Model (12x12x27)

If you have questions concerning burn boxes, contact Brian McDonald, 63712, or Bob Golden, 41496.
Although CO2 is generally considered an acceptable euthanasia agent for small laboratory animals, the Office of Laboratory Animal Welfare (OLAW) has issued the following clarification concerning its use.

- High concentrations of CO2 may be distressful to some species, therefore it is recommended that euthanasia chambers be pre-filled with CO2 only if it is known not to cause distress in the species being euthanized. A general recommendation would be to place animals in the chamber and then add CO2, using a flow rate that will allow a 50% displacement of air with CO2/minute.

- **DEATH MUST BE VERIFIED AFTER EUTHANASIA AND PRIOR TO DISPOSAL.** Use of appropriate CO2 concentrations and exposure times, followed by thoracotomy (opening of the thorax) will assure the irreversibility of the procedure. This is very important, because unintended recovery of animals after apparent death from CO2 (e.g., in dead animal coolers) constitutes a serious noncompliance with the PHS Policy and must be reported promptly to OLAW with a full explanation of the circumstances and actions taken to correct the non-compliance.

- Institutions must ensure that all individuals responsible for administering CO2 euthanasia (or any other form of euthanasia) are appropriately qualified and monitored and that they adhere to PACUC-approved protocols and institutional policies.

- Euthanasia chambers must not be overcrowded. It is important to also consider that mixing unfamiliar or incompatible animals in the same container may be distressful and is to be avoided.

- Compressed CO2 in cylinders is the only AVMA Panel-recommended source of CO2 for euthanasia purposes.


**Buprenorphine Rescheduled from Schedule V to Schedule III**

Article provided by Bill Ferner, DVM, Dipl. ACLAM

(Federal Register, Oct. 7, 2002, Vol. 67 (194);

DEPARTMENT OF JUSTICE, Drug Enforcement Administration 21 CFR part 1308

ACTION: Final rule.

SUMMARY: This final rule is issued by the Deputy Administrator of the Drug Enforcement Administration (DEA) to reschedule buprenorphine from a Schedule V narcotic to a Schedule III narcotic under the Controlled Substances Act (CSA). This action is based on a rescheduling recommendation by the Department of Health and Human Services (DHHS) and a DEA review indicating that buprenorphine meets the criteria of a Schedule III narcotic. The DEA published a proposed rule to reschedule buprenorphine on March 21, 2002 (67 FR 13114). The comment period was extended for an additional 30 days until May 22, 2002 (67 FR 20072). The DEA received ten comments but no requests for hearings.

This final action will impose the regulatory controls and criminal sanctions of a Schedule III narcotic on those persons who handle buprenorphine or products containing buprenorphine.
The National Academy of Sciences (NAS) will not conduct a study on the use of rats, mice, and birds in biomedical research and testing. The 2003 Omnibus Farm Bill exempted rats, mice and birds from the Animal Welfare Act (AWA), but directed NAS to conduct a study on the numbers of rats, mice and birds and the types of research studies in the U.S. However, there was no accompanying appropriations of funds from Congress to conduct the study. DHHS has decided not to fund the study and USDA is unlikely to do so, according to ILAR director Joanne Zurlo.

From The Scientist Online, November 6, 2002,
Daily News at:
http://www.biomedcentral.com/news/20021106/12