

Building a Research Occupational Health Program



OLAW Online Seminar
March 12, 2020

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OLAW FAQ G.9.: olaw.nih.gov/guidance/faqs#G

9. How can institutions and their IACUCs best prepare for a pandemic?

Institutions must adhere to provisions of the PHS Policy, the Guide *ii*, and the commitments detailed in their Animal Welfare Assurance with OLAW. This includes advance planning for conditions that could arise as a result of a human pandemic (e.g., influenza or outbreaks of novel infections (e.g., coronavirus disease 2019) that could jeopardize the health and wellbeing of animals because of a lack of personnel to care for the animals and/or to conduct IACUC official business.

Pandemic plans developed by institutions and IACUCs should include consideration of the following:

- Animal facilities must be maintained at a level to ensure animal welfare. Plans should consider appropriate staffing levels, cross-training to cover critical operations, and adequate inventories of essential supplies (e.g., feed, bedding, personal protective equipment, cages/wash supplies).
 - The IACUC should develop a plan for conducting official business during a pandemic event, taking into account the following:
 - The IACUC must continue to be properly constituted.
 - A quorum is required to conduct official business at a convened meeting.
 - The IACUC must ensure that protocol approvals are not allowed to expire or if they do expire, that no further animal activities (e.g., data collection) are conducted.
 - Appointment and training of IACUC members (including non-scientific members and alternates) should be considered as a part of the plan. (See NOT-OD-01-017)
- In devising a pandemic plan, the institution may wish to consider using options provided in the PHS Policy that it does not choose to use in the normal operation of its animal care and use program. Social distancing means focused measures to reduce contact among people. The PHS Policy contains some provisions that can be instituted as social distancing measures to prevent the spread of disease, including:

- The IACUC may institute alternatives to face-to-face meetings such as teleconference or video conferencing (NOT-OD-06-052).
- The number of IACUC meetings may be reduced to as few as one every six months, the minimum allowed by the Guide.
- The IACUC may choose to expand their use of designated member review.

For information about coronavirus disease 2019 (COVID-19), see:

- <https://www.cdc.gov/coronavirus/2019-ncov/index.html>
- <https://www.nih.gov/emergencies/diseases/novel-coronavirus-2019>
- <https://medlineplus.gov/laboratoryanimalwelfare.html>

For resources that may be helpful in developing an institutional pandemic plan, see:

- <https://oasasaweb.nih.gov/guidance/ohw/index>
- https://www.oasas.org/ocul/ocul_resources/olaw/olaw_preparedness/VHrDFw/E.p
- <https://medlineplus.gov/laboratoryanimalwelfare.html>

Additional guidance will be developed and posted on the OLAW website if an emergency situation is sufficiently severe and long-lasting that OLAW determines that the above suggestions do not meet the needs of the research community and funding components. OLAW is the only entity authorized to make determinations regarding waivers to provisions of the PHS Policy.

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National Institutes of Health
Office of Laboratory Animal Welfare



Occupational Health and Safety Programs

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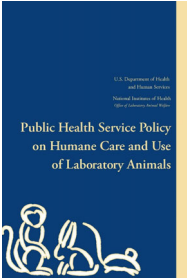
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Objectives

- Identify Occupational Health and Safety Program (OHSP) requirements per PHS Policy and *Guide*
- Indicate who is responsible for the OHSP
- Identify essential components of an effective OHSP

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Requirements

PHS Policy IV.A.1.f.

For institutions with an Animal Welfare Assurance, the Institutional Program for Animal Care and Use must include a description of ...
“the health program for personnel who work in laboratory animal facilities or have frequent contact with animals”

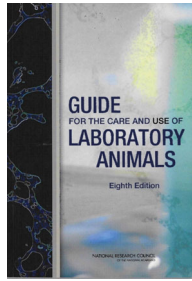
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Requirements

Guide for the Care and Use of Laboratory Animals, 2011 (p 17-23)

"Each institution must establish and maintain an occupational health and safety program (OHSP) as an essential part of the overall Program of animal care and use."

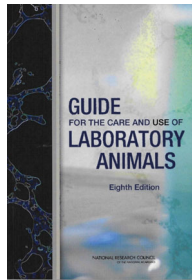


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Requirements

Medical Evaluation and Preventative Medicine for Personnel

- "...development and implementation of a program of medical evaluation and preventive medicine should involve input from trained health professionals, such as occupational health physicians and nurses."
- "Confidentiality and other medical and legal factors must be considered..."



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Polling Q1



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Components of an OHSP

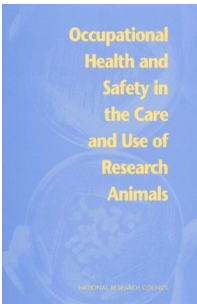
- Personnel Training
- Disaster Planning/Emergency Preparedness
- Risk Assessment
- Medical Treatment
- Facilities, Equipment & Monitoring
- Hazard Identification
- Health Assessment
- Personal Protection

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Risk Assessment is an Essential Component

Two parts to the risk assessment process include:


- Identifying hazards associated with risks of the job
- Identifying risks of the individual



Occupational Health and Safety in the Care and Use of Research Animals, National Research Council, 1997

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OLAW FAQ G.2. What is Required?



Pre-placement medical evaluation
Identification of hazards to personnel and safeguards appropriate to the risks associated with the hazards
Appropriate testing and vaccinations
Training of personnel regarding their duties, any hazards, and necessary safeguards
Personal protective equipment (PPE)

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OLAW FAQ G.2. What is Required?



Policies and facilities that promote cleanliness
Provisions for treating and documenting job-related injuries and illnesses
Facilities, equipment and procedures designed, selected and developed to reduce the possibility of physical injury or health risk to personnel
Good personal hygiene practices, prohibiting eating and drinking, use of tobacco products, and application of cosmetics and contact lenses in animal rooms and laboratories

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Summary

- The institution is responsible for establishing and maintaining an effective OHSP
- The nature of the OHSP will depend on the facility, research, hazards, and species involved ...beginning with an identification of those hazards and assessment of the associated risks
- An effective OHSP requires evaluation of program components and the coordination of various research, program, administrative, and facility personnel

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Building an *Effective* Research Occupational Health Program

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Requirements for an Occupational Health and Safety Program (OHSP)

PHS Policy IV.A.1.f.

➤ For institutions with an Animal Welfare Assurance, the Institutional Program for Animal Care and Use must include a description of “the health program for personnel who work in laboratory animal facilities or have frequent contact with animals.”

Guide for the Care and Use of Laboratory Animals (p. 17)

➤ “Each institution must establish and maintain an occupational health and safety program (OHSP) as an essential part of the overall Program of animal care and use.”

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Health Risks of Animal Care Staff

Veterinary services rank 2nd in incidence rates for non-fatal occupational injuries and illnesses

Types of injuries or illnesses:

- Laboratory animal allergies, with progression to asthma
 - 10-46% of exposed develop allergies
- Needlestick/sharps injuries
- Musculoskeletal disorders (MSDs)
- Compassion fatigue, stress, burnout
- Zoonotic infectious disease

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Topics for Today

Confront the barriers

Improve upon what you have

Be inclusive

- Go beyond the *Guide*
- Consider the broader research community

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Challenges and Barriers to an Effective OHSP

Lack of expertise

Lack of resources

Institutional barriers

- On-campus health services focused on student health only
- OHSP focused on clinical care, not research environment

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Polling Q2

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What Does Your OHSP Need to be?

“The nature of the OHSP will depend on the facility, research, hazards, and species involved.” (*Guide, p. 17*)

- Start by evaluating the risks
- Conduct an assessment of all activities involving animals

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Building an Effective Program

Hallmark of an Effective Program?

Sound Implementation Strategies
Focus on developing sound, realistic policies and procedures

Based on your risks, understand program needs (i.e., time, resources)

- It's OK to start small
- Utilize outsourced expertise wisely
- Build in training opportunities

Program needs champions

- Leadership and doers

Regardless of size, a successful program requires a team approach

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Engage Leadership → Gain Support

Hallmark of an Effective Program?

Strong Administrative Support

Engage
Proactively discuss regulatory requirements and risks with senior leadership

Data – conduct a gap assessment

- Internal or external
- Compare against requirements and peer institutions
- Survey program users
- Rate status of program areas (e.g., not present, developing, mature)

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Challenge – Lack of a Broader OHSP

No on-site occupational health program

- List of providers as opposed to an occupational program to “integrate” into
- Urgent care is first line of treatment
- State-run programs
- Connect with institutional risk management

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Example Situation
Growing Research Institution

No on-site occupational health service

- No occupational health expertise in-house
- Used biomedical research focused occupational health consultant to provide remote support (i.e., medical evaluations)
- Used consultant to train in-house staff

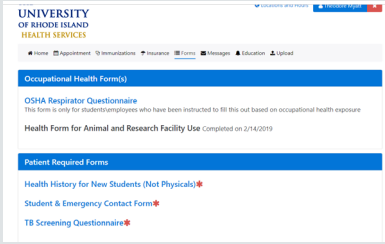
Gradually expanded in-house programs

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Be Efficient

- Use available capabilities and services
- Use Health Services electronic medical records system for animal contact medical surveillance and respiratory protection medical evaluation



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Improve Your OHSP – Learn, Grow, Evolve

Programs should be ever changing

- Semiannual IACUC program review is a good mechanism for self-evaluation

Identify funds for training opportunities

Improve your logistics

- Make interacting with the program as easy as possible – consider the researcher’s perspective
- Can communication between offices be improved?
- Interact with Human Resources to connect immediately with new hires
- Interact with Enrollment Services to obtain student rosters for classes that involve animal contact

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Be Inclusive – Go Beyond the *Guide*

NIH Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules

OSHA Standards

- 29 CFR 1910.1030 Bloodborne Pathogens
- 29 CFR 1910.95 Occupational Noise Exposure
- 29 CFR 1910.1048 Formaldehyde
- 29 CFR 1910.1450 Laboratory Standard

Nuclear Regulatory Commission Standards and Regulations

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Include Everyone

Protections for:

- pregnant women;
- immunocompromised individuals; and
- People not involved with the animal care and use program (e.g. visitors, students, maintenance workers, emergency workers)

• Ensure your institution does not limit services to those with animal contact

• What about staff or students that do not have contact with animals?

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What Does a Program Look Like?

Animal Exposure

- Medical surveillance program, health history questionnaire, tetanus vaccination
- Employees who handle wild animals will be provided rabies vaccinations

Biological Materials

- Laboratory workers who handle pathogens for which there is an effective vaccine available will be provided vaccinations for those agents

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What Does a Program Look Like?

Reproductive Concerns

- Laboratory workers who handle materials for which exposure may result in potential reproductive and developmental concerns will be provided risk evaluation and medical advice

Respiratory Protection

- Laboratory staff may necessitate the use of a respirator due to medical considerations or exposure to allergens or hazardous materials
- Connect with EH&S to provide fit testing

Other Occupational Injuries

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Example Situation

Clinical Care Focused Occupational Health Program

Robust clinical care occupational health program

- Large research program
- Beyond basic support for animal care staff (i.e., allergen exposures), there was a lack of understanding of other occupational risks

Work to incorporate research issues into larger occupational health program

- Engaged OHSP team to participate in research-related functions to learn about research health risks (e.g., attending IBC, IACUC)
- Established lines of communication with local emergency department to facilitate care the event of exposures

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Improve Your OHSP

Hallmark of an Effective Program?

Ensure Coordination of Program Components

Meet regularly with stakeholders

Continue to develop resources

- Medical SOPs for health providers
- Agent specific training, hazard specific training

Expand to new areas

- Ergonomic evaluations

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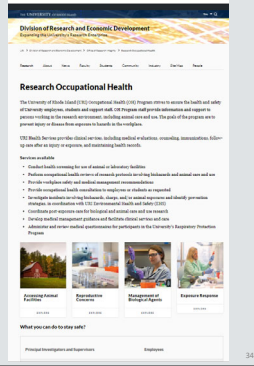
Build Awareness

IACUC policy requires participation

- IACUC research protocols and courses that involve exposure to animals

IBC policy

- Communications with faculty, staff, and students
- Website, flyers, and magnets



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Involve the Community → Gain Support

Demonstrate the value of the OHSP

- Publish annual progress reports

Ask for feedback

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Questions




Submit to the chat box in the GoToMeeting control panel

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Question 1




Can you provide possible approaches or options that Assured Institutions may implement regarding completion of a medical evaluation?

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Question 2




My institution involves using animals in teaching. What is the expectation for the oversight of the students in an OHSP?

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**Question 3
Part I**




A PI considering writing his own IACUC training protocol for rodents. It involves participants who will observe the procedure and others who will have an opportunity to perform hands-on surgical procedures. What are the Occupational Health requirements for participants observing animal procedures and for participants manipulating or performing the animal procedures?

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**Question 3
Part II**




What is the most effective composition of the Occupational Health Program that would be amenable for a small university with few resources (e.g., no adjunct medical school)?

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**Question 3
Part III**




What are the different models that universities use to fulfill NIH requirements (e.g., external contracts, relationship with hospitals)?

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**Question 3
Part IV**




Who is responsible for ensuring that there is an Occupational Health Program and where does this program fit in the structural organization of the institution?

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Question 4




How can institutions and their IACUCs best prepare for a coronavirus pandemic?

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Question 5
Part I




Can OLAW provide guidance to institutions that are unable to conduct semiannual facility inspections at least once every 6 months as a result of a complete shutdown due to COVID-19 and/or where only essential personnel are allowed into facilities?

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Question 5
Part II




If OLAW authorizes a waiver regarding conducting semiannual facility inspections within the 6 month timeframe as a result of COVID-19, will institutions be allowed to “pick up where they left off” or will they be required to “catch up”?

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Question 6




If procedures on an IACUC-approved activity cannot be performed (e.g., administration of post procedural analgesia) as a result of a facility closure due to COVID-19, would that be considered reportable noncompliance to OLAW?

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Question 7



What should institutions do in the event surgical masks or N95 respirators are not available for purchase due to shortages?


[cdc.gov/noish/topics/hcwcontrols/recommendedguidanceextuse.html](https://www.cdc.gov/noish/topics/hcwcontrols/recommendedguidanceextuse.html)

[cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy/index.html](https://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy/index.html)

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Question 8




What provisions should be made if an institution is unable to provide the support, resources, or services to maintain a compliant animal care and use program (e.g., shortage of available animal care personnel)?

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Question 9




We have students that take classes on a farm. How should we handle their occupational health needs?

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Question 10




We are almost finished with our Assurance renewal writing for submission, but with our institution is preparing for a shut-down/slow-down due to COVID-19, my fear is that it may not be submitted to OLAW in a timely manner. Is there any accommodation for business that is "not as usual"?

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Questions



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**Animal Research and Public Support:
A 2020 Vision for Strategic Communications
and Micro-Messaging**



OLAW Online Seminar
June, 11 2020

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