



**Division of Research
University Policy**

SUBJECT: Access Control and General Requirements for Working in Animal Facilities	Effective Date: 10/28/2016	Policy Number: 10.4.16
	Supersedes: 11/09/04 and 06/01/09	Page of 1 6
	Responsible Authorities: Vice President, Research Institutional Animal Care and Use Committee Director, Research Integrity Director, Comparative Medicine	

I. Background

The *Guide for the Care and Use of Laboratory Animals* states that preventative measures should be considered such as physical and information technology security to protect personnel from criminal activities, e.g. personnel harassment and assault, facility trespassing and vandalism. “The scope of the security system should depend on the size of the facility as well as the nature of the activities conducted within” (*Guide*). Security and access control is not only important as a preventative tool for domestic terrorism but also protects animal colonies vulnerable to infections with adventitious agents. Personnel Protective Equipment (PPE) is per *Guide* one of the first considerations of managing risks in the realm of personnel protection when working with animals in research and teaching besides engineering controls, i.e. design of facilities and safety equipment, and administrative controls, i.e. standard operating procedures. It, again, also adds to the protection of animal resources from unwanted infections.

II. Purpose

The purpose of this policy is to establish animal facility access rules and minimum requirements for wearing personal protective equipment (PPE) when handling animals used in research and teaching.

III. General Statement

FAU and its Institutional Animal Care and Use Committee are committed to providing safe animal facilities where faculty, staff, students, property and animals are free from threats, assaults, and acts of violence. Working with animals exposes animal care personnel, research personnel, students and potentially anybody entering animal facilities to unique risks including allergies, injury from bites and scratches and contracting diseases from the animals. Furthermore, sophisticated health surveillance and quarantine programs including

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access control and required PPE to be worn have been implemented to protect FAU animal colonies from adventitious infections keeping them in an agreed upon specific-pathogen-free status.

IV. Policy

1. All animal facilities – CM managed centralized as well as PI managed satellite facilities – are required to maintain controlled access. Animals must be maintained behind at least one locked barrier/door, separated from public areas—facility doors must be equipped with locks or electronic security devices. Security features such as card-key systems or electronic surveillance should be considered.
2. Only those persons assigned to an IACUC Protocol, employed by Comparative Medicine, the Research Integrity office or staff of other FAU departments with legitimate duties and specifically trained on entry requirements will be allowed unescorted into an animal facility.
3. All others, including students, visitors and contractors must be escorted by authorized personnel and cleared by the AV or her designee if entering CM managed facilities. Faculty hosting visitors must complete the form “Visitors (Including Minors) in Animal Facilities and Research Areas Request Form” for visitors from other institutions that want to enter CM managed facilities.
4. No person under the age of 18 will normally be allowed in an animal facility. Persons under 18 years of age must adhere to and follow FAU Policy “Children in the Workplace” and EH&S Policy “Minors in Research Laboratories or Animal Facilities”.
5. Access control for research personnel will be established by the IACUC based on completion of IACUC required training, enrollment in FAU’s Occupational Health Program and personnel added to an approved IACUC protocol.
6. All personnel should be aware of their surroundings and the people entering animal facilities. Unfamiliar people not displaying identification should be challenged or reported to the facility manager, PI or FAU PD depending on the facility (CM vs. PI managed) and particular circumstances. In general, personnel should never:
 - a. Give their swipe card or access key to others to use.
 - b. Provide access to someone unfamiliar.
 - c. Piggy-back into a facility or allow someone piggy-back behind them.
7. All personnel are responsible for locking doors they unlock, assuring that the facility is secure when they leave.
8. Access to CM managed animal facilities can be revoked by the IACUC, the AV and her designee or other security officials of FAU as is appropriate to protect the security and integrity of the animals under the care of CM.
9. Under no circumstances should research personnel enter animal housing rooms that do not house their animals. Each person entering animal facilities has to be familiar with the health status levels within one vivarium and between different animal facilities and follow the instructions and signs posted.
10. Eating, drinking, chewing gum, applying cosmetics, and storing food for human use are prohibited within animal facilities except within designated break rooms.
11. Sandals and open toed shoes are prohibited in any animal facility. Personnel should not wear shorts or skirts when working with animals larger than rodents or performing certain procedures (e.g. surgeries).
12. Either facility dedicated appropriate cloth/scrubs or disposable gowns are required upon entry into any animal facility except for facilities housing fish only and must be removed upon exiting the facility. Additional PPE and entry requirements may apply in

some facilities/rooms and certain situation, e.g. BSL 2 or quarantine areas. All signage on doors must be followed before entry into a specific room.

13. Gloves should be worn whenever handling animals, dirty caging or equipment that was in contact with animals. Upon exit of a facility, hands should be washed or a hand sanitizer applied.
14. In CM managed facilities PPE will be available to anybody entering at the entrance to the facility or at room level if a specific health status, which must be worn within the particular vivarium or room. In PI managed facilities respective PIs or their departments are responsible for providing staff and students with appropriate PPE.
15. Work clothes and other reusable PPE must be kept clean and in good repair. The party providing PPE is responsible for the laundering of dedicated work clothes and reusable PPE. It cannot be laundered at home instead must either be laundered in a laundry facility on campus dedicated to the relevant animal facility or a contract laundry service, which is familiar with washing work clothes potentially contaminated with human/animal pathogens.

V. Definitions

1. **Animal Facility** is an IACUC designated place where animals are housed under an approved IACUC protocol, either a CM managed centralized vivarium often also including procedure space or a PI managed satellite facility.
2. **Access to animal facilities** can be unescorted or escorted. Unescorted access is the privilege of entering an animal facility at any time facilitated by key or slide cart access provided to a particular person. Escorted access is the privilege of entering an animal facility while supervised/guided by a trained and qualified person with unescorted access privileges.
3. **Personal Protective Equipment (PPE)** refers to protective clothing including hair covers, eye/face protection and gloves worn by faculty, staff and students for protection against health and safety hazards. In addition, it also protects against cross contamination between animal colonies.

VI. Accountability

The Principal Investigator (PI) will be responsible for:

- Including all personnel requiring access to animal facilities in the relevant IACUC protocol or amending the protocol to add new personnel.
- Assuring that personnel completes the IACUC training requirements, is enrolled in FAU's Occupational Health Program and follows the provisions of this policy.
- Ensuring for the entire staff of the research lab animal facility security and wearing of appropriate PPE as indicated for a particular facility or particular area in a facility while following instruction and signs posted.

The IACUC will be responsible for:

- Reviewing and approving, requiring modifications in (to secure approval) or withholding approval of IACUC protocols and/or amendments, especially in regards to personnel.
- Providing oversight for animal facility security and protection of personnel and animals via appropriate personal protective equipment and including these topics in the semi-annual program reviews conducted.

The Research Integrity office will be responsible for:

- Administrative support of the IACUC members to facilitate their regulatory function.
- Maintaining policy and assure regular review and update as necessary by the IACUC.
- Reviewing training records, enrollment documents for the Occupational Health Program and communicate with CM for initial access for new personnel.

The Attending Veterinarian (AV) and the Office of Comparative Medicine (CM) will be responsible for:

- Providing access to CM managed facilities as per IACUC guidance.
- Assuring animal facility security while working closely with FAU PD and other key/slide cart access control personnel.
- Reviewing key and access card lists regularly but no less than once yearly and adding or removing personnel as appropriate.
- Providing appropriate PPE for all CM managed facilities.
- Reviewing visitor forms and provide guidance to faculty responsible for visitors.

VII. Procedures

1. Access to PI managed satellite facilities will be granted by the faculty member who is responsible for the facility and its security. The person before being granted access has completed IACUC required training and is approved as study personnel on an active IACUC protocol or amendment.
2. For CM managed facilities the following applies:
 1. All vivaria have slide card access for external doors and some also at the room level for both housing and procedure rooms.
 2. Slide card access will be requested by CM for research personnel once all IACUC requirements have been met.
 3. Slide card access is controlled and monitored by FAU PD. The latter also manages video surveillance of entrances to CM managed vivaria.
 4. Some facilities/access doors have an alarm system wired to the FAU PD. Emergency egress only doors are activated 24/7 whereas other doors will trigger the alarm after a certain time period the door is kept unlocked.
3. Unescorted access to CM managed facilities will be automatically initiated when personnel has:
 1. Completed all training required by the IACUC (see IACUC policy 10.4.22 Researcher Training at http://www.fau.edu/research/docs/policies/research-integrity/p22_researcher_training.pdf).
 2. Enrolled in FAU's Occupational Health Program
 3. Added to an active IACUC protocol either the original protocol or through an amendment, which has been approved by the IACUC
4. Each person entering an animal housing room within a CM managed facilities has to abide to the work flow pattern within and between vivaria on a single calendar day:
 1. Facilities on the Boca Raton campus and the Jupiter campus have differing pathogen exclusion lists. Boca Raton vivaria have to be visited first and once a person entered the Jupiter facilities cannot return to a Boca Raton vivarium.
 2. Follow the order of health status level. The highest level is designated as level 1, while ascending numbers are associated with decreasing health status level (see also Classifications of Facilities/Rooms at

<http://www.fau.edu/research/comparative-medicine/animal-health-surveillance.php>). Any experimental procedures including breeding and observation of animals housed in differing health status levels have to be planned in advance accordingly.

3. There are no restrictions moving from a higher health status level to a lower health status level. Conversely, one cannot move from a low health status level to a higher health status level on the same day.
 4. If due to unforeseen circumstances research or animal care staff needs to enter a room/facility with a higher health status level after having been in a low level area a full shower has to be taken including washing of the hair and scrubs/cloth changed.
 5. These health status levels are applicable for mouse and rat housing areas only. However, if other species are visited in a facility with a lower health status level one cannot enter a room housing mice or rats.
 6. Designated signs identifying the concurrent health status level will be affixed to the door outside of each room/cubicle to facilitate compliance.
 7. Additional PPE will be provided for specific rooms at the entry level and trash receptacles for removing PPE there while leaving if applicable, e.g. in BSL2 areas.
5. Animal facility key and slide card management:
1. It is recommended that a log will be maintained in an electronic database or hard copy check out system. Personnel must be verified to be authorized animal model users before issuance of keys or activation of slide card access.
 2. Annually or more frequently keys or slide card access will be inventoried and access list(s) reviewed by security key/access control personnel. Protocol or staff assignment records will be checked against current IACUC records. People no longer employed by FAU or no longer performing animal work will have their access cards turned off or will be contacted to return keys.
 3. PIs managing satellite facilities are responsible for the keys/card access issued to their assigned personnel.
 4. If re-keying becomes necessary due to lost key(s) costs might be applied to the responsible party and/or relevant research lab or department.
6. Process for escorted access to CM managed animal facilities for visitors include:
1. In the "Visitors (Including Minors) in Animal Facilities and Research Areas Request Form" describe the reason for the visit, visit time, facility(s) that will need to be accessed, and the faculty member or his/her designee responsible for the escort of the visitor.
 2. Have the visitor provide a copy of the enrollment in an Occupational Health Program at his/her home institution or enroll in FAU's Occupational Health Program.
 3. Secure the signature of the AV and IACUC representative.
 4. Note that if the visitor will handle animals then the person must be added to an active IACUC protocol.

VIII. Policy Renewal Date

TBD

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POLICY APPROVAL

Initiating Authority

Signature: _____

Date: _____

Name: Daniel C. Flynn, Ph.D., Vice President for Research

Executed signature pages are available in the Initiating Authority Office(s)