

Version: 1.4 Effective Date: 12/14/2016	ANIMAL OCCUPATIONAL HEALTH AND SAFETY PROGRAM POLICY	Supercedes Document Dated: 4/8/2015
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I. Background

The Public Health Service Policy on Humane Care and Use of Laboratory Animals (hereinafter referred to as PHS Policy) requires institutions receiving PHS funds to establish and maintain a program for the care and use of animals in research and teaching, using the current *Guide for the Care and Use of Laboratory Animals (Guide)* as the basis of said program. An essential component of this program is for the institution to have a health program for all individuals who work in laboratory animal facilities or have contact with animals. The nature of the institutions' occupational health and safety program will depend on the type of facility, research activity, animal species involved, frequency of animal contact or exposure and associated risks for the work hazards, the program may not affect all individuals equally.

II. Policy

Oversight and evaluation of the University of California, Berkeley's animal care and use program is the responsibility of the Animal Care and Use Committee (ACUC), the Attending Veterinarian (AV) and Institutional Official (IO). However, it is the ACUC, in cooperation with the University Health Service (UHS), that is charged with establishing and implementing an appropriate occupational health and safety program as it pertains to animal use. The ACUC requires:

1. All individuals listed on a research or teaching Animal Use Protocol (AUP), and;
2. Any individual through their employment who has contact with or exposure to live animals, to enroll in the Animal Occupational Health and Safety Program (AOHSP) prior to beginning their work or contact with animals.

III. Program Components

- A. Enrollment for an individual in the program is completed in four steps via the Occupational Health Surveillance System (OHSS):
1. Supervisor creates a Risk Assessment (RA) for the individual.
 2. The individual must review and agree to the RA and then completes a Health Questionnaire (HQ) about their personal health information and history.
 3. An Occupational Health Physician will review the RA and the HQ and decide if there is no further action required or if the individual needs additional follow up or medical consultation.

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4. The individual must acknowledge the medical professional's assessment electronically
 5. After initial enrollment, updates to the RA and HQ via OHSS are based on changes to workplace exposures, changes in personal health risks, and/or as determined by the Occupational Health Physician
 6. In addition, completion of any training requirements as established by ACUC, Office for Laboratory Animal Care (OLAC), Office for Environment, Health & Safety (EH&S) or other relevant compliance bodies may be required before an individual can be added to an AUP.
- B. Further participation in the program may be required depending on an individual's answers to the HQ, and/or type of animal exposure, which will be one or more of the following:
1. The OHC may contact a participant to clarify any of the responses on the RA and/or HQ.
 2. The OHC may contact a participant to answer any health-related questions or concerns, as it pertains to working in an animal research facility.
 3. The OHC may *recommend* participation in a medical surveillance program or a specific prevention program (e.g., offering vaccination against vaccine-preventable zoonotic diseases).
 4. The OHC may *require* participation in a mandatory medical surveillance/screening or prevention program for work with specific species and/or hazards (e.g., nonhuman primates, *Mycobacterium tuberculosis*).
 5. No further action needed.
- C. Report all work-related accidents, injuries, and/or illnesses to a supervisor or PI. The report should include:
1. The appropriate accident/injury report form must be completed and submitted by the supervisor or PI. Serious injuries must be immediately reported to EH&S at (510) 642-3073.
 2. If injuries involve an infectious agent or recombinant DNA, the campus Biosafety Officer in EH&S must be contacted (as above).
 3. Treatment of work-related injuries or illnesses:
 - a) Life-threatening or severe injuries require activation of the 911 system.
 - b) Urgent or non-urgent injuries can be treated at the UHS/ Tang Center Urgent Care or the Occupational Health Clinic. Employees may choose to be treated by their primary physician.

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- c) All medical care for a work-related injury of an employee¹ is done at no cost to the employee (through workers' compensation program).

IV. Applicability

- A. This policy applies to all Principal Investigators (PIs), technicians, laboratory personnel, research fellows, students, other staff, and visiting scientists. Even PIs who do not themselves work directly with animals are required to enroll in the AOHSP.
- B. Students whose only animal exposure is in the classroom or in the field as part of a course are not required to enroll. However, the instructor should provide information about any potential health risks with the animal species being used during the course.
- C. All animal care staff employed by the OLAC who work with animals or in animal housing areas are required to participate. Other university employees who may have intermittent exposure (e.g. facility maintenance) must complete and submit a HQ via OHSS.
- D. Individuals working with nonhuman primates (NHPs), in addition to completing a HQ via OHSS are required to enroll in the NHP medical screening program.
- E. Furthermore, members of the ACUC and staff of the Office for Animal Care and Use (OACU) staff must also participate in the AOHSP.

V. Definitions

- A. Animal – Any live, vertebrate animal used or intended for use in research, research training, experimentation, teaching, biological testing, or related purposes
- B. Animal Biosafety Level (ABSL) – Classification of risk level that the research is conducted under. Such level is assigned by the Committee on Laboratory & Environmental Biosafety.
- C. Occupational Health Surveillance System (OHSS) – A secure online mechanism for conducting a risk assessment and corresponding, HIPAA-protected, confidential medical evaluation for employees with exposure to animal biohazards and other workplace or laboratory exposures. Individual – Any UC Berkeley faculty, staff, student; or, collaborators, visitors, volunteers and affiliates who have direct contact with or exposure to animals.

¹ A Graduate student may be considered a University of California (UC) employee and, therefore, covered by workers' compensation; however, this is evaluated and determined on a case-by-case basis by the University of California, Berkeley Disability Management Services and OHC.

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- D. Personal Protective Equipment (PPE) – Equipment worn to minimize exposure to a variety of hazards.
 - E. Nonhuman Primate (NHP) Exposure Program – A mandatory medical surveillance program for individuals who work with or are exposed to nonhuman primates, their unfixed tissues and/or bodily fluids (e.g., blood, urine).
- VI. Responsibilities
- A. ACUC – Responsible for establishing and evaluating a risk-based AOHSP. The ACUC also requires that all individuals who are associated with research or teaching involving animals are listed on the AUP and enrolled in the AOHSP.
 - B. EH&S – Responsible for training and promoting the safe use of biological, chemical and physical agents and hazardous materials, the controlled substance program, and review of field research safety plans. In addition EH&S staff provides the mandatory Northwest Animal Facility (NAF) ABSL Level 2 & 3 training as well as the respiratory protection program, which provides respirator fit testing and training. Furthermore, EH&S provides guidance and assistance on development of written Standard Operating Procedures (SOPs) for hazardous operations or the handling of hazardous materials.
 - C. Individual – Responsible for enrolling in the AOHSP through completion, submission of his/her HQ via OHSS, and acknowledgment of the medical assessment (MA), and complying with all occupational safety guidelines. In addition, the individual is responsible for obtaining appropriate training to wear the PPE and then wearing the appropriate PPE as per the University of California Policy on “Personal Protective Equipment”.
 - D. OHC – The Occupational Health Clinic through its professional staff is responsible for reviewing each submitted RA and HQ via OHSS to determine if any risk-based medical surveillance, screening, or prevention measures (e.g., vaccines or personal protection equipment) are needed to reduce animal related health risks. It is also OHC’s responsibility to inform each individual of the result of the Medical Assessment. All questionnaires regarding the confidentiality of personal health information will be maintained according to federal and state guidelines.
 - E. OLAC – The Office of Laboratory Animal Care is responsible for mandatory training on NHP handling. This office also provides the names of OLAC employees to OHC and ensures all employees enroll and participate in the AOSHP. In addition, OLAC ensures that physical plant staff are informed and enrolled as appropriate to work assignments in animal facilities. For outside contractors doing work in animal facilities, OLAC informs them of any potential health risks in the areas where they will be working. Lastly,

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OLAC ensures that Personal Protective Equipment (PPE) is available in the animal facilities.

- F. OACU – Is responsible for verifying that individuals listed on a PI's AUP are enrolled in the AOHSP, notifying the PI about any individual who is not appropriately enrolled, and informing the ACUC Chair and AV (Director of OLAC).
- G. PI – Responsible for ensuring all individuals are aware of and are participating in the AOHSP and that appropriate safety training is provided and documented for each individual working in their laboratory or listed on their AUP. The PI (or designee) is responsible for creating a RA via OHSS (see III. A. 1). In consultation with EH&S, the PI is also responsible for the development and implementation of SOPs as necessary based on the work being done. The AOHSP must be offered by PIs to any volunteers or visitors who may be exposed to live vertebrate animals, their tissues, and/or bodily fluids. The PIs must ensure that their staff complies with the UC "Personal Protective Equipment" policy.

VII. References

- A. Applied Research Ethics National Association (ARENA) – Office of Laboratory Animal Welfare (OLAW). (2002). *Institutional Animal Care and Use Committee Guidebook* (2nd ed.).
- B. Institute of Laboratory Animal Research (ILAR) (2011). *Guide for the Care and Use of Laboratory Animals* (8th ed.). Washington, D.C.: The National Academies Press.
- C. Institute of Laboratory Animal Resources (ILAR). National Research Council (1997). *Occupational Health and Safety in the Care and Use of Research Animal*. Washington, D.C.: The National Academy Press.
- D. Office of Laboratory Animal Welfare (2002). *Public Health Service Policy on Humane Care and Use of Laboratory Animals* (pp.10, IV.A.1f).
- E. University of California Policy, *Personal Protective Equipment* (effective March 31, 2014):
<http://policy.ucop.edu/doc/3500597/PersonalProtectiveEquip>