

Version: 1.1 Effective Date: May 10, 2024	RECORD RETENTION POLICY	Supercedes Document Dated: <i>7/1/2014</i>
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I. Background

In keeping with sound business practices and in support of its mission, the University of California, Berkeley creates, gathers, and maintains operational and historical records of its activities. The objective of the University Records Management Program is to ensure that, consistent with other university policies, applicable state and federal laws as well as university contracts, administrative records regarding animal teaching, research and testing are appropriately managed and can be retrieved as needed, and then are discarded to reduce administrative burden.

II. Policy

All administrative Animal Care and Use Committee (ACUC) records will be kept for the minimum time required by OLAW's Public Health Service (PHS) Policy, UC Policy and/or the USDA's Animal Welfare Act and Regulations (AWA/AWR). If the required retention time differs between the above, then the document will be held for the minimum time of the longest requirement.

III. Definitions

- A. Activity – Those elements of research, testing or teaching procedures that involve the care and use of animals.

UC Berkeley interprets “activity” as equivalent to “protocol” in accordance with the guidance issued by the California Biomedical Research Association (CBRA) on record retention under the AWA/AWR and PHS grants.

- B. Administrative Record – Any document or correspondence referring to animal activity held by the ACUC in the Office for Animal Care and Use (OACU) as the office of record. For example, protocols, amendments, and IACUC meeting minutes; semi-annual program reviews and facility or lab inspection reports; post-approval monitoring reports; USDA inspection reports will be maintained for three years from the date of the inspection; IACUC correspondence with PIs, USDA, and OLAW will be maintained for three years from the date of the correspondence. If the correspondence relates directly to a protocol, it will be maintained for three years after the protocol's expiration date; and, written reports of concerns will be maintained for three years from the evaluation end date. If the report

relates directly to a protocol, it will be maintained for three years after the protocol's expiration date.

IV. Responsibilities

- A. ACUC Members – Responsible for ensuring that copies of any official documents they may be in possession of are destroyed in a timely, appropriate manner per policy.
- B. Office for Animal Care and Use (OACU)
 - 1. Director
 - a) Has primary responsibility for ensuring adequate ACUC documentation of compliance for animal research and teaching activities at UC Berkeley. Other records supporting the management of the Animal Care and Use Program and institutional policies, guidelines and standard operating procedures are also the responsibility of the Director to review, replace and purge from office systems and storage as indicated.
 - b) Is responsible for granting individuals permission to access ACUC or OACU electronic records in computer systems and for ensuring that such individuals abide by institutional policies and procedures with appropriate security measures.
 - 2. Staff
 - a) Responsible for collection, documentation, management, and safekeeping of all ACUC/OACU records, protocols files and the appropriate long-term storage and/or disposition of said items per this policy.
 - b) Ensuring that all documents on the ACUC website remain current.
- C. Office of Laboratory Animal Care (OLAC) – Responsible for maintaining animal health records and other relevant documents for facilities under their oversight such as but not limited to:
 - a. Animal room temperature logs, daily check sheets, and husbandry logs
 - b. Acquisition/Disposition Records for USDA covered species.
 - c. Quality assurance records (cage wash temperature results, Rodac plate results, sentinel reports, and autoclave monitoring results)
- D. Principal Investigator (PI) – Responsible for ensuring documentation and maintenance of:
 - 1. Procedural training documents for all individuals working under their AUP.

2. Logs and records for the animals used in research or teaching procedures outlined in the PI's AUP including but not limited to animal health and research records such as to anesthesia and post op records, surgery, food and/or water restrictions, and any other animal procedure related records.
3. Breeding and weaning records.

V. Record Retention Period

The retention period for research and teaching records is at least three years from the protocol's end (expiration) date or termination of the protocol, whichever later occurs. If the initial protocol approval is followed by a *de novo* review and approval, this does not change the document retention time frame associated with the initial protocol. Specifically, the initial protocol needs to be retained for only three years following the end-date of the initial protocol, as indicated in the approval, regardless of subsequent *de novo* (*continuing*) review and approval.

Animal health records must be maintained by OLAC for at least one year beyond the animal's terminal disposition. However, certain species and animals in longitudinal studies may need to be kept indefinitely.

VI. Record Storage

- A. ACUC approved Animal Use Protocols (AUPs) are stored on a password-protected, secure server.
- B. Non-protocol-related ACUC or OACU records are stored in a departmental drive on a password protected secure server.

VII. Record Release

- A. All records shall be accessible for inspection and copying by authorized USDA/APHIS, funding Federal agency (e.g., NIH/OLAW) or other PHS representatives or inspectors at reasonable times and in a reasonable manner.
- B. If there is an alleged USDA/APHIS violation, inspectors will retain the materials from the research facilities' premises pending the completion of the possible violation or for other enforcement purposes. Release of this material is governed by the Freedom of Information Act (FOIA).
- C. With regard to projects funded by non-federal sponsors, ACUC records shall also be retained and be accessible for inspection and copying by the sponsor in accordance with applicable law and University policy.
- D. Depending on the nature of the document requested, all other requests for release of records will be coordinated between the UC Berkeley Public

Records Coordinator, the OACU Director, ACUC Chair and/or the Attending Veterinarian (AV) as appropriate and handled in accordance with University of California Business and Finance Bulletins and policy as well as pertinent state or federal law.

VIII. Record Disposition

- A. Paper copies of research protocols, documents related to the Association for the Assessment and Accreditation for Laboratory Animal Care (AAALAC), as well as ACUC and external agency visit records will be shredded or recycled depending on the sensitivity of the information contained therein once they have passed their retention period according to the above schedules.
- B. Email or other electronic communication documentation will be deleted from servers and/or hard drives consistent with the above schedules to the degree possible. This is the responsibility of the individual who is in possession of the sent communication.

IX. References

- A. Animal Plant Health Inspection Service (APHIS). United States Department of Agriculture (USDA). “*Definitions*”, Title 9, Chapter 1. Part 1. Section 1.1. 2009 ed.
- B. Animal Plant Health Inspection Service (APHIS). United States Department of Agriculture (USDA). “*Recordkeeping requirements*”, Title 9, Chapter 1. Part 2. Subchapter C. Section 2.35. 2009 ed.
- C. Applied Research Ethics National Association-Office of Laboratory Animal Welfare (ARENA-OLAW). (2002). Recordkeeping and Communications. In M. Pitts, et.al. (Ed.) *Institutional Animal Care and Use Committee Guidebook* (pp. 167-180).
- D. California Biomedical Research Association (CBRA). (2010). “Guidelines for Record Retention for Protocols Operating Under NIH Grants”.
- E. California Biomedical Research Association (CBRA). (2010). “Guidelines for Record Retention for Protocols Operating Under the AWA”.
- F. Institute of Laboratory Animal Research (ILAR). National Research Council (2011). *Guide for the Care and Use of Laboratory Animals* (8th edition).
- G. Office of Laboratory Animal Welfare. (2002). “*Recordkeeping Requirements*”. Public Health Service Policy on Humane Care and Use of Laboratory Animals.
- H. University of California Office of the President (UCOP). Administrative Records Relating to Research: Retention and Disposition Requirements.

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