

8.0 Specific Types of Inspections

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**ATTEMPTED
INSPECTION**

An attempted inspection occurs when an authorized person is not available to accompany the inspector and no inspection is conducted. [2.38]

Criteria

An attempted inspection is when:

- a representative of the research facility is not available to accompany the inspector, or
- it is inappropriate to conduct an inspection at that time

If the research facility is at a business location:

- check in at the reception/registration desk
- have the designated research facility representative(s) phoned or paged
- if the designated representative is not available, determine if there is anyone else available to accompany you on the inspection
- wait a reasonable amount of time for someone to become available, if appropriate

If the research facility is not at a business location, determine that no one is available by:

- knocking loudly on the door several times
- ringing door buzzers
- calling out the person's name, if appropriate
- honking your vehicle's horn several times, if appropriate
- checking around the facility for someone, but do not enter animal buildings or pass through closed gates without prior authorization from the research facility
- calling the phone number(s) provided by the research facility to contact the designated representative to determine if he/she can be at the facility within 30 minutes
- waiting a reasonable amount of time for someone to arrive at the facility

Do not conduct an inspection of the facility without being accompanied by a representative of the research facility.

If you are unable to contact anyone, complete an inspection report as follows:

1st attempted inspection: (See example on page 8.1.4)

- designate as an Attempted Inspection in “Inspection Type” in LARIS
- cite under SECTION 2.38(b)-ACCESS AND INSPECTION OF RECORDS AND PROPERTY
- Type in the narrative that “This is the 1st attempted inspection.”
- cite as described on page 7.3.1 for a new noncompliant item identified
- in the narrative, use the following or a similar citation: On *(date)* at *(time)*, registrant/research facility failed to have a responsible person available to conduct an animal welfare inspection.”
- if appropriate, put your (the inspector’s) voicemail number in the narrative with a statement such as “If your hours of availability have changed, please contact me at *(voicemail guest number)* and leave a message.”
- type in the “Received by” line that the inspection report was sent by regular first class mail
- send the Inspection Report to the registrant/research facility by regular mail

2nd and subsequent consecutive or recurring attempted inspections:

- designate as a REPEAT violation
- cite as described on page 7.3.5 for a repeat noncompliant item
- type in the narrative that “This is the *(number)* attempted inspection.”
- type in the “Received by” line that the inspection report was sent by certified mail and the Certified Mail Receipt number (see “Delivery of the Inspection Report -Certified Mail” - page 9.2.2 for instructions)
- send the Inspection Report to the registrant/research facility by certified, return receipt mail
- using your Region’s standard procedure, make a

recommendation for an enforcement action (see Section 9.3
- Enforcement Actions)

Note: Continue to attempt to conduct a routine inspection
after recommending an enforcement action.



United States Department of Agriculture
Animal and Plant Health Inspection Service
Animal Care

INSPECTION REPORT

SMITH UNIVERSITY

**Customer ID: 9999
Certificate: 99-C-0001**

**1 Protocol Lane
Research, NJ 55555**

SAMPLE

Site: 001

**Inspection
Type: Attempted
Date: Feb-01-2006**

NARRATIVE

2.38 (b)

ACCESS AND INSPECTION OF RECORDS AND PROPERTY.

A research facility shall allow APHIS officials to enter its place of business and inspect facilities, property, and animals, and to examine records as necessary to enforce the provisions of the Animal Welfare Act regulations and standards.

On Wednesday February 1, 2006, the research facility did not have a responsible person available to conduct an animal welfare inspection.

This is the first attempted inspection.

The research facility was not able to be inspected for compliance with the Animal Welfare Act regulations and standards and to ensure the health and well-being of the animals

A responsible person must be available to accompany the inspector on an animal welfare inspection.

Correct immediately.

Prepared By: _____
USDA-APHIS-ANIMAL CARE

Date: FEB-01-2006

Title: VMO

Inspector ID: 9999

Received By: SENT BY REGULAR FIRST-CLASS MAIL

Date: FEB-01-2006

Title: _____

<p>BARRIER FACILITY INSPECTION</p>	<p>Animals housed in a barrier facility and/or Specific Pathogen Free (SPF) colony must be maintained in accordance with all Animal Welfare Act regulations and standards. [Policy #9]</p>
<p>Criteria</p>	<p>The inspector must have access to inspect all regulated animals at a research facility's barrier facility to ensure compliance.</p> <p>If it is not possible for the inspector to enter the animal rooms in the barrier facility, due to the possibility of disease exposure and/or contamination of the inspector or the animals, the inspection may be conducted by:</p> <ul style="list-style-type: none"> • video viewing from outside the barrier room (see below) • visual inspection through an adequate viewing window (see below) • selecting random animals to be visually inspected, and • analyzing environmental records <p>Entry into the barrier facility The inspector may enter the barrier facility, if he/she determines that entry is necessary to adequately complete the inspection and/or resolve a suspected problem.</p> <p>The inspector must follow the entry procedures normally used by the research facility's personnel. NOTE: The facility must supply a copy of its barrier entry procedures upon request.</p> <p>The research facility must:</p> <ul style="list-style-type: none"> • not require more stringent entry standards for the inspector • provide the protective clothing and supplies needed to complete the inspection, such as pen, paper, flashlight, etc. <p>The research facility may ask the inspector to verify that he/she has not been in contact with, or exposed to, certain animals for a specified period of time, generally, this is 72 hours. This verification is acceptable.</p> <p>The inspector must NOT sign any statement in which he/she accepts responsibility for the health of the animals in the barrier facility.</p>

**Alternative Methods
of Inspection**

Video Camera Inspection

If a video camera is to be used for inspecting the barrier facility, the following minimum guidelines should be met by the research facility:

- video camera must be portable enough to get into all parts of all the rooms that will require inspection, such as the animal rooms, food and bedding storage areas, medication storage areas, and cage washing/sanitizing areas
- video camera must have a high enough resolution so that the inspector can clearly see the animals in the cages and see subtle differences, such as being able to distinguish between bedding and feces in or beneath the cages
- there must be a communication system between the person operating the camera and the inspector so that the inspector can direct the person to view different areas or zoom in on an area
- the lighting in the room must be sufficient to allow for good visibility or the facility must have supplemental lighting available
- the monitor must be a color monitor so that color differences can be seen, for example, to distinguish blood from other fluids or see algae/scum growth in water
- if possible, the inspection should be recorded so the inspector and research facility representative can refer back to the tape to review an area if any questions arise after the facility inspection

Through a Viewing Window

If the inspection is to be conducted through a viewing window(s), the following minimum guidelines should be met:

- all parts of all the rooms that will require inspection, such as the animal rooms, food and bedding storage areas, medication storage areas, and cage washing/sanitizing areas, must be visible through the window(s)
- there must be a communication system between the person inside the room and the inspector so that the inspector can direct the person, such as to bring cages or animals to the window, or to open cabinets or containers

Refusal of Inspection

- the lighting in the room must be sufficient to allow for good visibility or the facility must have supplemental lighting available

If a research facility representative refuses to allow the inspector to enter the barrier facility when all standard entry requirements have been met, and fails to provide an acceptable alternative method of inspection, this should be documented as a "Refusal of Inspection."

The inspector must:

- inform the representative that this a violation of the Animal Welfare Act
- leave the facility
- complete an official inspection report
- designate this as a "Routine" inspection on the inspection report
- document the refusal in the inspection report narrative section
- be specific as to date, time, and the name of the person who refused to allow the inspection. An example citation is: SECT 2.38(b)-ACCESS TO PROPERTY AND RECORDS-On *(date)* at *(time)*, *(name of person)* refused to allow an inspection of the barrier facility.
- send the research facility a copy of the inspection report by certified, return receipt mail

NOTE: If a designated research facility representative cannot be contacted and a non-designated person, such as an employee, refuses to allow the inspection, this should be documented as an "Attempted Inspection."

COMPLAINT INSPECTION	A complaint inspection is conducted in response to a concern received by Animal Care.
Sources of Information	<p>Sources of information include, but are not limited to:</p> <ul style="list-style-type: none"> • general public • animal protection group • whistle blower • city, county, or State agency • APHIS personnel • other Federal agency <p>Methods of obtaining information include, but are not limited to:</p> <ul style="list-style-type: none"> • phone calls • letters • e-mail • personal contact • fax <p>NOTE: The complainant does not have to give his/her name. If the complainant does give his/her name, you should not give out the person's name in order to maintain confidentiality. However, the complainant's name may be subject to a FOIA request.</p>
Information Follow-up	<p>Decide if the information applies to the Animal Care program.</p> <p>If it does not apply to the Animal Care Program, refer the complainant to the appropriate office/agency if known. Possible referral agencies include, but are not limited to:</p> <ul style="list-style-type: none"> • US Fish & Wildlife Service • State wildlife agency • local animal control • local or national humane society • State animal welfare agency <p>If it does apply to the Animal Care Program but is not a possible violation:</p> <ul style="list-style-type: none"> • explain regulations and situation to complainant • take no further action

If it **does apply** to the Animal Care program **and is** a possible violation:

- complete a Complaint sheet (see page 8.3.3)
- determine if the complaint applies to someone in your territory

If **not** in your territory,

- forward the Complaint sheet to the Regional Office
- inform the complainant it is not in your area but you are forwarding it to the Regional Office
- give the complainant the Regional Office phone number for follow-up

If **in** your territory,

- contact your Supervisory Animal Care Specialist (SACS) to determine if an inspection or investigation is needed
- conduct an inspection if required. Note: Designate the inspection as a "Routine" inspection.
- complete the Complaint sheet and a memo detailing your findings, if appropriate
- forward the Complaint sheet, inspection report, and memo, if applicable, to your SACS or Regional Office following your standard procedure

Response Time

The time frame for responding to a complaint depends on the severity of the situation. The response time may be:

- within 72 hours when the animal's health and well-being is threatened, e.g., a report from an internal source of animals experiencing excessive pain or distress
- as directed by your SACS or other program official, e.g., a situation with high public attention or Headquarters/Administration involvement
- within 30 days or by the deadline given for all other complaints, e.g., general complaint that a research facility is using stolen animals



USDA, APHIS, Animal Care

ANIMAL WELFARE COMPLAINT

Complaint No. Date Entered Received By

Referred To Reply Due

Facility or Person Complaint Filed Against

Name Customer/License/Registration No.

Address

City State Zip Phone No

Complainant

Name Organization

Address

City State Zip Phone No./Email address

How was complaint received?

Details of Complaint:

Results:

Application packet provided? Yes [] No []

INSPECTOR

DATE

REVIEWED BY

DATE

CONFISCATION PROCEDURES

Any animal not currently being used for research and found by an APHIS official to be suffering as a result of failure to comply with the AWA regulations and standards may be confiscated and euthanized. [2.38(e) and Policy #8]

Criteria

If the research facility takes no action to alleviate the suffering, APHIS may confiscate the animal(s) following the procedures outlined in Policy #8. An animal does not have to be in jeopardy of dying to be in a state of suffering.

You should consider starting confiscation procedures if conditions are such that:

- an animal's health and well being is severely compromised
- an animal is in need of immediate care
- an animal may shortly be in need of immediate care

Conditions which can compromise an animal's health/well-being or require immediate care include, but are not limited to:

- lack of appropriate veterinary care for the medical conditions that you observe
- no food and water
- inadequate shelter or bedding for extreme weather conditions
- enclosures with:
 - ▶ excessive accumulations of feces or old food
 - ▶ dead, decaying animals
 - ▶ extremely soiled or wet bedding

Clinical signs indicative of an animal that is suffering and in need of immediate care include, but are not limited to:

- self-damaging stereotypic behavior, such as:
 - ▶ self-biting
 - ▶ hair pulling
 - ▶ head banging
- poor appearance, such as:
 - ▶ prominent bony processes
 - ▶ loss of hair coat
 - ▶ glassy or sunken eyes

- excessively matted hair resulting in:
 - ▶ skin lesions
 - ▶ difficulty defecating
 - ▶ vision problems
- hypothermia, such as:
 - ▶ shivering
 - ▶ frost-bitten extremities
 - ▶ huddling or piling of animals
 - ▶ loss of interest in surroundings
- severe injuries and wounds
- severe emaciation
- severe dehydration
- severe diarrhea or vomiting
- moribund condition, such as:
 - ▶ inability to stand up
 - ▶ labored breathing
 - ▶ little or no response to stimuli
- agonal respiration

NOTE: Animals may mask the clinical signs of pain and distress, therefore animals may be in more pain and distress than exhibited by their behavior. You should assess both the animal and its conditions carefully.

Procedure

- Before confiscating any animal, the APHIS official must:
1. make a reasonable effort to notify the research facility of the condition of the animal [2.38(e)(1)]
 2. request that the condition be corrected by [2.38(e)(1)]
 - ▶ adequate care being given, or
 - ▶ euthanasia of the animal
 3. if the registrant or a representative of the research facility cannot be located or notified, [2.38(e)(2)]
 - ▶ contact the Regional Office
 - ▶ contact local police or other law officers to accompany him/her to the premises
 - ▶ provide adequate temporary care for the animal

	<p>If the research facility refuses to comply with this request or the condition cannot be corrected by temporary care, you should:</p> <ul style="list-style-type: none">• contact your SACS (or Regional Director, if your SACS is not available)• confiscate the animal following Policy #8 - <i>Guidelines for the Confiscation and Destruction of Animals</i>. [2.38(e)(1)& (e)(2)] <p>NOTE: Take photographs (digital photographs preferred) of the animals to support confiscation actions. These photos should be sent or transmitted to the Regional Office (see Section 6.3 - Inspection Photographs) as soon as possible.</p> <p>The research facility from which the animals were confiscated is responsible for all costs incurred in the placement or euthanasia of the animals. [2.38(e)(3)]</p>
<p>Placement of animals</p>	<p>Confiscated animals may be: [2.38(e)(3)]</p> <ul style="list-style-type: none">• placed, by sale or donation, with other USDA registered research facilities or licensed dealers that:<ul style="list-style-type: none">▸ comply with the AWA regulations and standards, and▸ can provide proper care, or• euthanized

<p>INACTIVE RESEARCH FACILITY INSPECTION</p>	<p>A research facility officially designated as “inactive” should be inspected.</p>
<p>Criteria</p>	<p>A research facility may request to be placed in an inactive status if the research facility has: [2.30(c)(2)]</p> <ul style="list-style-type: none"> • not used, handled, or transported regulated animals for a period of at least 2 years, and • made a written request to the Regional Director for the State in which it is registered <p>An inactive research facility must: [2.30(c)(2)]</p> <ul style="list-style-type: none"> • file an annual report of its status • notify the appropriate Regional Director, in writing, at least 10 days prior to using, handling, or transporting regulated animals again
<p>Inspection Frequency</p>	<p>An inactive research facility should be inspected once per year.</p> <p>However, if you are unable to inspect an inactive research facility due to lack of time or other constraints, you should discuss this with your SACS.</p>
<p>Inspection Procedures</p>	<p>You, the inspector, should:</p> <ul style="list-style-type: none"> • physically inspect the research facility, and • complete an inspection report <p>If there are no covered species present and no covered research being conducted at the research facility at the time of your inspection, you should:</p> <ul style="list-style-type: none"> • document on the inspection report “No regulated activities” • encourage the research facility to cancel its registration • make sure that the research facility has an IACUC in place <p>NOTE: The IACUC is not required to meet nor perform the semi-annual animal facility and program reviews.</p> <ul style="list-style-type: none"> • remind the research facility that it must notify the

appropriate Regional Director, in writing, at least 10 days prior to using, handling, or transporting regulated animals again

If there are covered species present but are not being used for a covered activity at the time of your inspection, you should:

- document on the inspection report “No regulated activities”
- make sure that the research facility has an IACUC in place
- ascertain that the IACUC has reviewed the use of the covered species and determined that the use of the animals is exempt from coverage
- remind the research facility that it must notify the appropriate Regional Director, in writing, at least 10 days prior to using, handling, or transporting regulated animals again for covered purposes

Examples of covered animals being used for a non-covered activity include, but are not limited to:

- agricultural animals used for developing antibodies for agricultural animals
- breeding trials in sheep
- pigs on food conversion studies for pig feed

REFUSAL OF INSPECTION

Sometimes a research facility representative refuses to allow an inspection of the research facility. [2.38(b)]

If a representative of a research facility refuses to allow an inspection, be sure that:

- you have clearly identified yourself as a USDA Animal Care inspector
- the inspection is occurring during legal business hours - 7a.m.-7p.m., Monday through Friday
- the person refusing to allow the inspection is aware of the violation of the AWA regulations
- you ask the specific question: "Are you refusing to allow the inspection?"
- you ask to speak to a person of higher authority at the research facility

If the representative or the person of higher authority still refuses to allow an inspection, leave the premises and:

- complete an official inspection report
- designate this as a "Routine" inspection
- document the refusal in the inspection report narrative section
- be specific as to date, time, and the name of the person who refused to allow the inspection. An example citation is: SECT 2.38(b) ACCESS TO PROPERTY AND RECORDS- On *(date)* at *(time)*, *(name of person)* refused to allow an inspection of the facility and records.
- send the research facility a copy of the inspection report by certified, return receipt mail

NOTE: If two or more APHIS officials are present for the inspection and one is denied entry, document this as a refusal of inspection. Do not conduct an inspection.

<p>RESEARCH FACILITY OPERATING A POUND OR SHELTER</p>	<p>A research facility operating a pound or shelter must have separate premises and records for the two businesses. [2.132(e)]</p>
<p>Criteria</p>	<p>Physically Separate Businesses The pound or shelter must be physically separated from the research facility, that is:</p> <ul style="list-style-type: none"> • the two businesses must not be on the same premises • the animal housing facility of the pound/shelter must not be adjacent to the research facility <p>Records The dog & cat records for the research facility must be maintained separately from the pound/shelter records.</p> <p>For all dogs/cats, EXCEPT lost or stray dogs, the pound or shelter must make, keep and maintain the following records:</p> <ul style="list-style-type: none"> • name and complete address of the seller or donor, [2.75(a)(1)(i)] • USDA license or registration number if seller/donor is USDA licensed or registered [2.75(a)(1)(ii)] • vehicle license number and driver's license number and State of issuance of each if seller/donor is not USDA licensed or registered (see next page) [2.75(a)(1)(iii)] • date dog/cat was acquired [2.75(a)(1)(v)] • name and complete address of the buyer or person to whom dog/cat was given, if applicable [2.75(a)(1)(iv)] • USDA license or registration number if buyer or person to whom dog/cat was given is licensed or registered [2.75(a)(1)(iv)] • date the dog/cat was disposed of [2.75(a)(1)(v)] • method of disposition, such as: [2.75(a)(1)(ix)] <ul style="list-style-type: none"> ▶ sale ▶ donation ▶ death ▶ euthanasia

- official USDA tag number, tattoo, or microchip number, if applicable [2.75(a)(1)(vi)]
- a description of each animal [2.75(a)(1)(vii)]
- the species and breed or type [2.75(a)(1)(vii)(A)]
- the sex [2.75(a)(1)(vii)(B)]
- date of birth or approximate age [2.75(a)(1)(vii)(C)]
- the color and any distinctive markings [2.75(a)(1)(vii)(D)]
- the method of transportation, if applicable, including: [2.75(a)(1)(viii)]
 - ▶ name of the initial carrier or intermediate handler, or
 - ▶ name of the owner of the privately owned vehicle

If the vehicle license number and driver's license number cannot be obtained, the record must contain:

- an acceptable reason for not obtaining this information, and
- at least two of the following:
 - ▶ social security number
 - ▶ phone number
 - ▶ directions to the premises of the seller/donor
 - ▶ official identification card number

For lost or stray dogs/cats, the pound/shelter records must contain the following: [2.132(e)(2)]

- an accurate description of the dog/cat
- how the dog/cat was obtained
- where the dog/cat was found
- from whom the dog/cat was obtained
- when the dog/cat was obtained
- how long the dog/cat was held before being transferred to a dealer, if applicable
- date the dog/cat was transferred to a dealer, if applicable

SEARCH INSPECTION	A search is an investigation of anything relating to unregistered activity.
Subjects of Searches	<p>Subjects of searches include, but are not limited to:</p> <ul style="list-style-type: none">• a research facility whose registration was canceled due to non-renewal without explanation• a non-registered research facility purchasing regulated animals• previously identified violators <p>Use good judgment to decide when you have made a reasonable effort to verify a research facility's activities.</p> <p>Examples of ways to verify a research facility's possible regulated activities are:</p> <ul style="list-style-type: none">• making phone calls• checking broker records• checking dealer records• visiting the facility• communicating with other inspectors
Sources of Information	<p>Sources of information include, but are not limited to:</p> <ul style="list-style-type: none">• anonymous tips• general public• animal protection groups• whistle blowers• APHIS personnel• journal/newspaper articles• dealer records• city, county, or State agency• State health certificates• other Federal agency <p>Sources may provide information by the following methods:</p> <ul style="list-style-type: none">• phone calls• letters• e-mail• personal contact

NOTE: The informant does not have to give his/her name. If the informant does give his/her name, the person's name should not be given out, in order to maintain confidentiality.

**Information
Follow-up**

Decide if the information supplied to the Animal Care program involves a regulated activity or animal.

If the information **does not** involve a regulated activity/animal:

- educate the informant about regulated activities/animals
- thank the informant for his/her interest in the welfare of animals
- refer the informant to the appropriate office/agency, if known. Possible referral agencies include:
 - ▶ NIH - OLAW
 - ▶ AAALAC
 - ▶ US Fish & Wildlife Service
 - ▶ State wildlife agency
 - ▶ State animal welfare agency
- take no further action

If the information **does** involve a regulated activity/animal:

- thank the informant for his/her interest in the welfare of animals
- complete the top portion of a Search sheet (see page 8.8.7)
- determine if the information applies to a research facility in your territory

If the information applies to a research facility **not in your territory**:

- tell the informant that the facility is not in your territory but that you will forward the information to the Regional Office for distribution to the appropriate inspector
- give the informant the Regional Office's phone number for follow-up
- forward the Search sheet and any supplemental information (e.g., copies of records, invoices, sale bills) to the Regional Office

	<p>If the information applies to a research facility in your territory, conduct a search.</p>
<p>Conducting the Search</p>	<p>Verify the information received by:</p> <ul style="list-style-type: none"> • contacting the research facility • gathering additional information, such as: <ul style="list-style-type: none"> ▶ contacting witnesses ▶ assessing records ▶ reviewing newspaper or journal articles
<p><i>No Regulated Activity</i></p>	<p>If regulated activities are not being conducted:</p> <ul style="list-style-type: none"> • complete the bottom portion of Search sheet • submit your findings to your SACS or Regional Office
<p><i>Regulated Activity</i></p>	<p>If regulated activities are being conducted:</p> <ul style="list-style-type: none"> • inform and make available to the responsible person at the research facility all the pertinent aspects of the AWA and regulations/standards • explain that the activity requires a USDA registration • request a decision about the continuation of this activity • give or have the Regional Office send an Application for Registration (APHIS Form 7011), an application packet, and other pertinent forms and information • decide whether or not to request permission to inspect the facility. Situations where you may decide not to request permission to inspect include, but are not limited to: <ul style="list-style-type: none"> ▶ you are able to see animals and no major problems are observed ▶ responsible person is uncooperative and threatening ▶ person is not able to make a decision about obtaining a registration at that time
<p><i>Inspection Allowed</i></p>	<p>If the responsible person allows an inspection of the facility, the inspection report should be completed as follows:</p> <ul style="list-style-type: none"> • classify the inspection as “Routine” • note in the narrative that this was a “Search” inspection <ul style="list-style-type: none"> ▶ document all noncompliant items <p>NOTE: No correction date(s) should be given.</p>

- ▶ include a citation of "SECTION 2.30(a) - CONDUCTING REGULATED ACTIVITIES WITHOUT A REGISTRATION" and describe the regulated activity
- ▶ state the following at the end of the inspection report:
"NO REGULATED ACTIVITIES MAY BE CONDUCTED UNTIL USDA REGISTRATION IS OBTAINED."

If after the inspection the responsible person refuses to sign the inspection report, send the report to him/her by certified, return receipt mail.

Refusal of Inspection

If the responsible person refuses to allow an inspection of the facility:

- inform the responsible person that the research facility is in violation of the Animal Welfare Act by conducting a regulated activity without a registration
- give or have the Regional Office send an Application for Registration (APHIS Form 7011), application packet, and other pertinent forms and information to the responsible person
- submit a memo with the Search sheet:
 - ▶ describe the regulated activity that is being conducted
 - ▶ indicate that an inspection was not permitted
 - ▶ make a recommendation regarding enforcement action

No Inspection Conducted

If you decide **not to conduct an inspection**:

- inform the responsible person that the research facility is in violation of the Animal Welfare Act by conducting a regulated activity without a registration
- give or have the Regional Office send an Application for Registration (APHIS Form 7011), an application packet and other pertinent forms and information to the responsible person

**Post-Search
Procedures**

- submit a memo to the Regional Office:
 - ▶ describe the regulated activity being conducted
 - ▶ indicate the reason why you did not conduct an inspection

After conducting the search, ALWAYS:

- complete the Search sheet
- submit the Search sheet with the inspection report or memo to your SACS or the Regional Office following your standard procedure
- if an **inspection was conducted**, submit:
 - ▶ the inspection report, AND
 - ▶ a memo with your recommendation for an enforcement action (see Section 9.3)
- for a **refusal of inspection**, submit a memo:
 - ▶ describing the regulated activity being conducted
 - ▶ indicate that an inspection was not permitted
 - ▶ make a recommendation regarding an enforcement action (see Section 9.3)
- if you **decided not to conduct an inspection**, submit a memo:
 - ▶ describing the regulated activity being conducted
 - ▶ indicate the reason why you did not conduct an inspection
 - ▶ if appropriate, make a recommendation for an enforcement action (see Section 9.3)
- submit any photos taken of the regulated activity

If the inspection report was completed using the Microsoft Word inspection report template, then you should:

1. contact an ILA or the Program Specialist at the Regional Office
2. provide the ILA/Program Specialist the following information:
 - ▶ person or business's full name
 - ▶ complete business address
 - ▶ complete site address

- ▶ county, if known
- ▶ business telephone number, including area code
- 3. obtain the customer number, if available
- 4. replicate the LARIS database, after you have been informed that the person has been entered into LARIS
- 5. enter the information exactly as it is on the Word Inspection Report into the LARIS database
NOTE: Date of the actual inspection, date prepared, and date received should be the same as on the Word Inspection Report.
- 6. place the following statement in the narrative section: **“This is an electronic version of the report dated xx/xx/xx.”**
- 7. send a copy of the LARIS Inspection Report to the research facility by regular mail or email
- 8. attach a copy of the LARIS Inspection Report to the Word Inspection Report
- 9. submit the Inspection Reports to your SACS or the Regional Office following your standard procedure

**Follow-up
Procedure**

If the research facility you contacted on a search was conducted a regulated activity and the facility has not applied for a registration within 30 days, you should revisit the facility to determine if it is still conducting the regulated activity.

If the research facility is **no longer** conducting a regulated activity, you should

- complete and send a Search sheet to your SACS or the Regional Office, OR
- send a memo to your SACS or the Regional Office documenting your findings

If the research facility is **still** conducting a regulated activity, you should:

- if safe and appropriate, remind the person that a USDA registration is required to conduct this activity
 - document the regulated activity either by:
 - ▶ conducting another inspection, if possible
- NOTE: Any noncompliances not corrected,

-
- including conducting regulated activities without a registration, should be designated as "REPEAT" noncompliances. OR
 - ▶ completing another Search sheet, OR
 - ▶ writing a memo detailing your findings
 - take photographs, if possible
 - recommend an enforcement action (see Section 9.3)
 - send the information to your SACS or Regional Office
-



SEARCH FOR UNLICENSED ACTIVITY

Search Conducted by _____ Date Conducted _____

Name of Establishment _____ Customer No. if applicable _____

Person Contacted _____

Address _____

City _____ State _____ Zip _____ Phone No _____

Reason for search _____

Regulated activity verified Yes <input type="checkbox"/> No <input type="checkbox"/>	Non-compliances present Yes <input type="checkbox"/> No <input type="checkbox"/>	Inspection Report done? Yes <input type="checkbox"/> No <input type="checkbox"/>
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Application packet and information provided? Yes No

Details of Search:

INSPECTOR _____	DATE _____
REVIEWED BY _____	DATE _____

**VETERINARY
SCHOOLS &
VETERINARY
TECHNOLOGY
PROGRAMS**

Any veterinary school and veterinary technician training program using regulated animals for regulated teaching activities must meet all the applicable regulations and standards.

Animals

Regulated Animals

Regulated animals used at a veterinary school or veterinary technology program fall under the AWA regulations and standards if the animals are:

- owned by the veterinary school, veterinary technology program or other department within the school/program
- owned by another entity, such as a pound or shelter, but are housed at the veterinary school or veterinary technology program's facility to eventually be returned to the entity or adopted out
- used to teach anything other than agricultural techniques, procedures, husbandry, etc.
- used for teaching in a non-school setting, such as trauma courses at a local hospital

Non-Regulated Animals

Regulated animals used at a veterinary school or veterinary technology program do NOT fall under the AWA regulations and standards if the animals are:

- client-owned
- receiving medical care in a clinic setting
- owned by another department at the school/program but are being used to teach students as part of medical care being provided to the animal
- used to teach the agricultural sciences
- owned by an individual or organization, such as, a farm, ranch or animal shelter, and the students go to the facility to learn certain routine veterinary care procedures

If you are unsure if an animal(s) should be inspected, contact your SACS.

Sites or Locations

Regulated Sites/Locations

Regulated sites/locations in a veterinary school or veterinary technology program's facility which need to be inspected by you and the IACUC include, but are not limited to:

- all facilities within the school/program housing regulated animals used for teaching or research
- off sites/locations, such as farms or ranches, housing regulated animals owned by the veterinary school or veterinary technology program

Non-Regulated Sites/Locations

Sites/locations in a veterinary school or veterinary technology program's facility which do not need to be inspected by you and the IACUC include, but are not limited to:

- facilities within the school/program housing non-regulated species
- facilities within the school/program housing regulated animals used for non-regulated purposes, e.g.:
 - ▶ clinic areas housing client animals
 - ▶ Ag School barns with cows/sheep/goats used for teaching agricultural sciences only
- off sites/locations where students go to assist the veterinarian with required medical treatments, e.g., farm calls, pounds/shelters

NOTE: The IACUC may choose to inspect these sites/locations.

If you are unsure if a site/location should be inspected, contact your SACS.

Protocols

Protocols are required for any procedures involving the use of regulated animals for teaching purposes.

When reviewing teaching protocols, some areas to pay special attention to include, but are not limited to:

- the justification for the number of animals to be used was appropriate, such as the number of students per animal and procedures needed to be learned

	<ul style="list-style-type: none">• a consideration of alternatives was conducted, such as, the use of:<ul style="list-style-type: none">▶ veterinary mannequins▶ live tissue alternatives▶ mechanical teaching devices• there is a complete description of the procedures to be used• the number of procedures to be performed on each animal is clearly stated, such as, injections per animal• the personnel doing the teaching are qualified and properly trained• if the teaching procedures cause more than momentary pain or distress, proper methods are used to alleviate the pain/distress
Holding Periods	<p>Dogs and cats obtained from dealers, exhibitors or other exempt sources do not have to be held for 5 days prior to their use.</p> <p>Exempt sources include, but are not limited to:</p> <ul style="list-style-type: none">• individuals selling less than 25 dogs/cats born and raised on their premises per year for teaching or research purposes• pounds/shelters allowing the school/program to use their dogs/cats but they:<ul style="list-style-type: none">▶ retain ownership of the animals, and▶ have met all of their holding requirements• private individuals donating their dog/cat

