

<p>INDIRECT & DIRECT NONCOMPLIANT ITEMS</p>	<p>A noncompliant item documented on the inspection report must be determined by the inspector to be either "Indirect" or "Direct".</p>
<p>Indirect Noncompliance</p>	<p>An "Indirect" noncompliant item does NOT have a high potential to adversely affect the health and well-being of the animal. This NCI should be followed up as part of the next routine complete inspection.</p> <p>No special designation for an indirect NCI is required on the inspection report.</p> <p>Examples of "Indirect" NCIs include, but are not limited to:</p> <ul style="list-style-type: none"> • surfaces not impervious to moisture • inadequate records • minor veterinary care issues • semi-annual IACUC program review overdue • number of animals not adequately justified • training records of personnel incomplete <p>For more examples and a comparison of direct vs indirect noncompliances, see Chart on pages 7.6.4 - 7.6.5.</p>
<p>Direct Noncompliance</p>	<p>A "Direct" noncompliance is a noncompliance that:</p> <ul style="list-style-type: none"> • is currently adversely affecting the health and well-being of the animal, or • has the high potential to adversely affect the health and well-being of the animal in the near or immediate future <p><i>Required Reinspection</i></p> <p>A complete or partial reinspection of a research facility with a "Direct" NCI must be completed no more than 45 days after the correction date. NOTE: The correction date for a direct noncompliance should be short and never exceed 30 days (See Section 7.4 - Correction Dates).</p>

For a serious direct noncompliance, such as a severe veterinary care problem:

- the correction date should be very short, e.g., 1 day, and
- the reinspection should occur the next day and/or whenever needed to verify the correction

For a "Direct" NCI, in the LARIS database, you should:

1. highlight "DIRECT" in the NCI Severity Category field
2. assign a "HIGH DEGREE OF RISK" in the NCI Significance field
3. check that the word "DIRECT" prints next to the regulation/standard Section number and title on the Inspection Report

NOTE: If you enter an NCI into LARIS as a "Direct", you must reinspect the research facility within 45 days of the correction date, even if the NCI was corrected at the time of the inspection.

If you have to use the **word-processing or hand-written Inspection Report**:

- type or write the word "DIRECT" next to the regulation/standard Section number and title
- follow the above procedure when you enter the Inspection Report into the LARIS database

Examples of "Direct" NCIs include, but are not limited to:

- animals in need of urgent veterinary care, e.g.
 - ▶ serious illness or injury
 - ▶ excessive (frequent and voluminous) diarrhea and/or vomiting
 - ▶ bloody (red, dark, and/or tarry) diarrhea and/or vomiting
 - ▶ excessively thin/debilitated animals with no care provided
 - ▶ moribund - recumbent, labored breathing, little response to stimuli, etc.
- matted dog with underlying lesions and/or other health issues caused by the mats
- inadequate, spoiled or contaminated food and water

- lack of drinkable water, i.e., no water or extremely contaminated water
- grossly inadequate enclosure space where animal **cannot**:
 - ▶ make normal postural adjustments
 - ▶ hold its head up
 - ▶ lie in full recumbency
- lack of shade or shelter for current weather or temperature extremes that threaten the animal's health and well-being
- sharp wire, nails or other objects which are likely to cause injury and are in an area where the animal will come into contact with them
- live unprotected electrical cord or heat lamp in an enclosure where an animal can reach it
- feet falling through flooring which is impacting the animal's ability to walk and/or function normally
- excessive accumulation of feces, urine, mud or other debris that the animal cannot get away from or avoid lying in
- lack of ventilation which has resulted in noxious fumes (e.g. your eyes burn) at the level of the animal's eyes or nose
- inappropriate handling that clearly causes pain or distress, such as, the use of:
 - ▶ electrical shock or starvation to train animals
 - ▶ a power hose to make animals shift
- IACUC-related problems, such as:
 - ▶ nonfunctional IACUC
 - ▶ inadequate analgesia
 - ▶ inappropriate procedures to alleviate pain
 - ▶ lack of adequate medical care for animals

For a comparison of direct vs indirect noncompliances, see Chart on pages 7.6.4 - 7.6.5.

EXAMPLES OF DIRECT vs INDIRECT NONCOMPLIANCES

DIRECT NONCOMPLIANCE	INDIRECT NONCOMPLIANCE
Lack of veterinary care for a serious condition, such as: <ul style="list-style-type: none"> • serious illness or injury • emaciated or debilitated animals with no care provided • generalized dermatitis or severe otitis externa with no care provided • large, infected lick granuloma with no care provided 	Lack of veterinary care for a minor condition, such as: <ul style="list-style-type: none"> • cherry eye • mild or localized dermatitis • mild otitis externa • small lick granuloma • accumulation of tarter on teeth with no related impact on the animal
Inadequate enclosure space where animal cannot: <ul style="list-style-type: none"> • make normal postural adjustments • hold its head up • lie in full recumbency 	Minor space deficiency with no apparent impact on the animal
Lack of shade or shelter in extreme conditions for all species; or lack of shade or shelter in uncertain conditions for less hardy species	Lack of shade or shelter in minor or uncertain conditions for animals that do not normally seek shelter in those conditions (i.e., bison)
Food that is clearly spoiled or contaminated	Pest control problem but no food contamination
Structural violation where: <ul style="list-style-type: none"> • sharp wire, nail or other object is likely to cause injury, AND • it is in an area where the animal will come into contact with it (e.g., floor or near a food bowl) 	Structural violation where: <ul style="list-style-type: none"> • sharp wire, nail or other object is not in an area where the animal will come into contact with it (e.g., ceiling)
Matted dog with underlying lesions and/or other health impacts caused by the mats	Matted dog with no lesions or only minor lesions, and no other health impacts
Live unprotected electrical cord or heat lamp in an enclosure where an animal can reach the cord or lamp	Cords or lamps in enclosures that are not live and the animal is unlikely to get entangled in them

DIRECT NONCOMPLIANCE	INDIRECT NONCOMPLIANCE
<p>Feet falling through flooring to a degree that it is impacting the animal's ability to walk and/or function normally</p>	<p>Feet can fall through the flooring but there is no significant threat of injury to the animal and no visible impact on the animal's ability to function</p>
<p>Lack of drinkable water, i.e., no water or extremely contaminated water Note: In such a situation, ask the registrant to offer fresh water to the animal. If the animal drinks voraciously, this would be considered a direct NCI.</p>	<p>Lack of drinkable water, but the animal appears normal and does not drink voraciously when offered fresh water</p>
<p>Excessive accumulation of feces, urine, mud, water and/or other debris that the animal cannot get away from</p>	<p>Accumulation of feces, urine, mud, water and/or other debris but the animal can avoid the areas of accumulation while still having adequate freedom of movement</p>
<p>Handling of animals that clearly causes pain or distress, such as, the use of:</p> <ul style="list-style-type: none"> • electrical shock or starvation to train animals • a power hose to make animals shift 	<p>Handling violation with no apparent (serious) negative impacts on the animal</p>
<p>Lack of ventilation which has resulted in noxious fumes (e.g., your eyes burn):</p> <ul style="list-style-type: none"> • in the entire room/building • in the area surrounding the animal • at the level of the animal's eyes or nose, such as: <ul style="list-style-type: none"> ▸ floor level ▸ in closed cages (hamsters, gerbils, etc.) 	<p>Lack of ventilation without noxious fumes:</p> <ul style="list-style-type: none"> • in the entire room/building • in the area surrounding the animal • at the level of the animal's eyes or nose, such as: <ul style="list-style-type: none"> ▸ floor level ▸ in closed cages (hamsters, gerbils, etc.)
<p>Incompatible animals housed in the same enclosure</p>	<p>Animals housed together that occasionally fight but without serious physical or psychological harm</p>

