Assessing the health of your occupational health and safety program

by Chris Newcomer, V.M.D.

Approximately one year has passed since the publication of Occupational Health and Safety in the Care and Use of Research Animals (OHS Report), a companion volume to the Guide for the Care and Use of Laboratory Animals (Guide). Participants in the AAALAC International accreditation program may be wondering how these documents have influenced AAALAC's consideration of this important area of institutional policy and function.

The discussion of occupational health and safety in the 1996 Guide is much more thorough than earlier Guide editions. The new Guide recognizes opportunities for institutions to enhance their occupational health and safety programs through teamwork and through the expansion of provisions that assure health and safety in the research animal facility environment. The OHS Report provides further detail on approaches to developing a fully-integrated occupational health and safety program. It references the importance of cooperative and coordinated efforts of professionals with expertise relevant to the needs of the institution and its scientific mission.

Response from AAALAC constituents who have carefully reviewed the OHS Report—and its richer treatment of the subject of occupational health and safety—might range from enlightenment and empowerment to bafflement and paralysis. Either way, it’s likely that by now everyone understands that disarticulated occupational health and safety programs that continue to direct their resources solely towards the care of individuals with “substantial animal contact” (the language and thinking of the 1985 Guide), are likely to encounter criticism and require substantial positive AAALAC coaching during the site-visit review process. The following summary is intended to provide readers with some insight into the types and assessment of problems in occupational health and safety programs that have been recorded during AAALAC Council deliberations in the past year.

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As a percentage of all deficiencies cited during accreditation site visits, continued on page 2...
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occupational health and safety problems have remained relatively stable over the past four years. For example, from 1994 through 1997, occupational health and safety deficiencies represented 13.6 percent, 13.9 percent, 10.9 percent and 12.7 percent of the total number of deficiencies reported in successive years. Of course, the bad news is that the level of citations in this area remains high, falling only behind IACUC-related deficiencies [referring to the Institutional Animal Care and Use Committee], and deficiencies in heating, ventilation and air conditioning. Clearly, many institutions are still having a difficult time developing sound occupational health and safety programs, and diverse problem areas are being identified by the Council.

Who’s in charge?

Poor definition, or a lack of definition, of assigned authority and responsibility for the occupational health and safety program has been a problem. At some institutions, it has led to pervasive consequences for the scope, implementation, coordination and monitoring aspects of the program. Many other problems in the occupational health and safety program are often ultimately derived from this deficiency.

The emphasis in the Guide and OHS Report on the need for cooperation among different groups (e.g., occupational medicine, health and safety, human resources, research and veterinary personnel), provides an additional impetus for clearly assigning responsibility and authority for the program. According to the OHS Report, the institutional senior official has the ultimate responsibility for a safe workplace and the development of an effective administrative structure to implement a sound occupational health and safety program. Thus, when occupational health and safety programs are regarded as generally dysfunctional, Council has the opportunity to determine whether inattention and indecision is occurring at the level of the senior official, or whether ineffectual effort is occurring within the party(ies) authorized and responsible for the organization, coordination and implementation of the program. Symptoms of the underlying problem of authority include: weaknesses in program content; poor information exchange; lack of coordination among the professionals representing different areas of health and safety expertise (resulting in the unreliable and superficial handling of issues); and partial or inconsistent enrollment of personnel in the program.

Who should participate?

Another very common problem has been that some institutions have clung to the notion that participation in the occupational health and safety program can be restricted to a small subset of the total personnel who have “substantial animal contact.” This approach is based upon the rubric of the 1985 Guide, and the convenience of arbitrary and at times, irrelevant criteria.

Other institutions have excluded some categories of personnel (e.g., visiting scientists, students, personnel involved only with the use and care of rodents, etc.) from participation in their occupational health and safety program—without adequate justification or any relevant precedent for their decision. The Council has alerted these institutions to the significant change in perspective 309 introduced in the 1996 Guide and OHS Report. The change is that all personnel should be informed of and offered participation in an occupational health and safety program based on: hazards posed by the animals and materials; exposure intensity, duration and frequency; susceptibility of personnel; and the workplace history of occupational illness and injury. This is a tall order entirely consistent with the “performance standard” theme of the Guide.

The manner in which the institution achieves its goal of health and safety in the workplace is not prescribed in either the Guide, OHS Report, or by the Council. But it is necessary for institutions to develop a coherent and consistent process for determining how the provisions of the program will be allocated to assure the health and safety of all individuals with laboratory animal contact.

How should people be enrolled?

Problems with the enrollment of personnel in the occupational health and safety program have been detected in both institutions with reasonably well-defined processes for determining the level of participation, as well as those without such processes. Some institutions have expressed their intent to enroll all personnel in the program, but have not established an effective mechanism. In these cases, personnel may not have been informed of the program or of the need or rationale for participation. Or they may have been advised adequately, but were not tracked to ensure their participation, or their waiver of participation (if a waiver is permissible). The mechanism for enrollment and the person or party responsible for monitoring compliance with the enrollment policy should be established early.
in the formulation of the program. Enrollment and monitoring should also be subject to IACUC and other review mechanisms.

Education is a key component

It should be evident from the above that occupational health and safety programs must have an educational element. This element serves two functions: to stimulate and direct personnel participation in the program; and to inform personnel about the hazards they may encounter and the methods available to prevent or minimize exposure to these hazards.

Some institutions have neglected this important, and presumably cost effective, aspect of program development. Training issues are at the core of safe handling of hazards in animal studies, whether they are intrinsic to the animal or are related to the experiment. As an example, training is a critical component of an institutional plan to prevent personnel exposures to herpes B virus and to ensure that the emergency response in the event of an exposure is timely and appropriate. The institutional provisions for the prevention and management of B virus exposures among personnel are closely examined by the Council, and occasionally have been identified as a major deficiency area during the AAALAC review process. Accordingly, institutions involved with the care and use of macaques should consult and comply with applicable guidelines in this area (Holmes, G. P., et. al. 1995, Guidelines for the prevention and treatment of B-virus infections in exposed persons. Clin Infect Dis, 20: 421-439).

Other specific workplace hazards are often cited in AAALAC site-visit reports under the discussion of the occupational health and safety program. These may be regarded by the Council as serious program deficiencies. A single hazard, as in the case of B virus, may be regarded as a deficiency when it places personnel at imminent risk of severe illness or injury. Alternatively, a series of findings of inadequate workplace practices or hazardous work conditions may also be considered a deficiency by the Council. When a serious solitary finding, or multiple findings of lesser severity, has been noted, Council is provided an opportunity to question the organization’s rigor and consistency of institutional oversight mechanisms.

I hope these remarks will be useful to those of you who may be reviewing, or are in the process of modifying, your existing occupational health and safety program for personnel with laboratory animal contact. I encourage you to consult the excellent documents referenced above for additional information.

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OHS handbook available from National Academy Press

Occupational Health and Safety in the Care and Use of Research Animals (referenced several times in this issue’s lead story), was published last year as a companion to the widely-used Guide for the Care and Use of Laboratory Animals. The handbook identifies principles for building an effective safety program and discusses the accountability of institutional leaders, managers and employees for a program’s success. It provides a detailed description of risks—physical and chemical hazards, allergens, zoonoses, and hazards from experiments—that will serve as a continuing reference for the laboratory.

Copies are available through the National Academy Press for $39.95 each. Call 1-800-624-6242 or 202-334-3313, or visit the Internet at http://www.nap.edu/bookstore.