

February 26, 2003

TO: All Users of the Northwest Animal Facility

FROM: Helen Diggs, Director, Office of Laboratory Animal Care

RE: Policy Regarding Failure to Attend Mandatory NAF Training Sessions

One of the requirements of the Northwest Animal Facility (NAF) Mitigation Monitoring Program (MMP) is that all users of the NAF receive “employee and personnel emergency response training...” and “...regular training in the use and application of the program.” [Measure 4.11-1]. Similar language exists in other Mitigation Measures, specifically requiring training on emergency procedures and chemical hazards. These measures are a legal agreement between the University of California, Berkeley and former litigants, i.e., City of Berkeley and In Defense of Animals. Failure to comply with these measures places the University at risk of further legal action.

Most users of the NAF comply with these requirements by attending the training sessions provided by EH&S and the Office of Laboratory Animal Care (OLAC). These sessions are as brief as possible while adequately addressing the requirements. In spite of repeated notification, some users fail to attend either initial or required refresher training.

The following policy has been developed to ensure the University’s compliance with the Mitigation Monitoring Program. **This policy applies to all NAF users regardless of University status.**

- 1) It is the responsibility of the principal investigator (PI) to distribute training notifications promptly to all of their staff (employees and students) who use the NAF, and to assure that their staff attend all required initial and refresher training. Designation of required training (Basic Safety, Hazardous Materials Safety, and Biohazard Containment Facility Safety) is identified by evaluating the work performed in the NAF by each PI, and applies equally to all persons who work for the PI.
- 2) It is the responsibility of the PI to inform new personnel of these training requirements, and to inform Elizabeth Ignacio, the Laboratory Safety Officer, that these new staff will need training. The PI may designate a laboratory safety contact to receive the notifications. The PI must identify that person to the Laboratory Safety Officer, in writing, and request that the notices be sent directly to the laboratory safety contact. It is also the PI’s responsibility to inform the Laboratory Safety Officer at least one month in advance if that designation is to be transferred to another person.

- 3) It is the responsibility of OLAC personnel to provide the Laboratory Safety Officer with a copy of each completed keycard or key code request form within two (2) working days of its receipt by OLAC. It is the responsibility of the Laboratory Safety Officer to keep the training database current to ensure that appropriate notifications are sent.
- 4) It is the responsibility of the Laboratory Safety Officer to send out the training requirements and scheduled training dates to each PI or laboratory safety contact no less than two weeks prior to the scheduled training. Notification for each type of required annual refresher training begins eleven months after completion of a previous session of that type.
- 5) **After three consecutive notifications, any person who fails to receive the needed training will be denied access to the NAF by cancellation of keycard or key code until the required training has been documented. Any person found lending a keycard to such a person or assisting them in avoiding compliance will immediately lose access to the NAF. Re-instatement will be subject to a conference between the barred individual(s), their PI, the Laboratory Safety Officer, and the Director of OLAC. All costs associated with these actions will be borne by the PI. Repeated failures to keep training current may result in the permanent loss of NAF access privileges. Security breaches and other safety related issues may be brought to the attention of the NAF Building Safety Committee.**

Questions regarding this policy may be directed to either Dr. Helen Diggs at 642-9232, or Elizabeth Ignacio at 642-3073.

cc: Quig Driver, Management Services Officer—Office of Laboratory Animal Care
Mark Freiberg, Director—Environment, Health & Safety
Elizabeth Ignacio, Laboratory Safety Officer—Northwest Animal Facility
Michael Wisherop, Acting Manager, Health & Safety—Environment, Health & Safety