

The “AAALAC International i-brief” (short for “Issue Brief”), is designed to help clarify specific elements of the accreditation process, and is published as a service to accredited institutions. Feel free to distribute this i-brief to others at your organization.

Suggestions for Improvement (SFIs)

Their purpose, what they mean, and how to respond.

What is an SFI?

SFIs, or “Suggestions for Improvement,” are items that may be included in the official report you receive from AAALAC International after an accreditation site visit. They are called SFIs because that’s exactly what they are—suggestions that, in the opinion of the Council on Accreditation, will enhance your program. An SFI is an element of the peer review process that’s designed to assist accredited programs by sharing the cumulative knowledge and experience of the Council.

Your institution is *not* required to respond to SFIs presented during the exit briefing, although you are free to do so (and also to disagree) through a Post Site Visit Communication (PSVC), which is a written response from your organization back to the Council on Accreditation.

All SFIs follow a common format. First they state the problem. Then they state why it’s a problem and what should be done to correct it. Here’s an example of an SFI as it would appear in a site visit report:

“The doors to several animal rooms in Building 1 had missing door sweeps. [The problem.] There was a visible gap beneath the doors that could allow easy entry of vermin. [Why it’s a problem.] Doors should be constructed and maintained to prevent the entry of vermin. Council encourages

that all animal room doors be re-evaluated and repaired, as necessary.” [What should be done to correct it.]

And another example:

“Cleaning utensils such as brooms and mops were stored on the floor. Many were dirty and worn. [The problem.] These practices can decrease the effectiveness of room sanitation procedures. [Why it’s a problem.] Cleaning utensils should be cleaned regularly and worn items should be replaced. Utensils should be stored in a neat, organized fashion that facilitates drying and minimizes contamination.” [What should be done to correct it.]

How do SFIs differ from “mandatory items for correction?”

The report you receive from AAALAC International may include two categories of actionable items. The first are the SFIs, and the second are “mandatory items for correction.” Mandatory items are considered serious problems that don’t conform with national requirements, the *Guide for the Care and Use of Laboratory Animals* (the *Guide*, NRC 1996), or some other AAALAC International Reference Resource (see www.aaalac.org/accreditation/resources.cfm), or problems that have the potential to harm people or animals. Unlike SFIs, mandatory



First published May 2007.

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items must be addressed and resolved before full accreditation is granted. Here's an example of **a mandatory item for correction** as it would appear in a site visit report:

"The rack washer did not have an emergency escape mechanism. To ensure the safety of workers, rack washers must have an emergency escape mechanism and personnel must be properly trained in its use. Council must be informed when the rack washer emergency escape mechanism is in place and personnel utilizing the rack washer are properly trained in the use of the escape mechanism."

Here's another example of **a mandatory item for correction**:

"One laboratory staff member was observed performing survival abdominal surgery in mice without proper aseptic technique. The surgeon was not using sterile technique and did not adequately prepare the surgical site. Postoperative infections in rodents may be unapparent, cause distress to animals, and confound research results. This person also reported that they were not administering analgesics postoperatively because they did not consider it to be a painful procedure. In general, unless the contrary is known or established, it should be assumed that procedures that cause pain in humans also cause pain in animals. The Animal Care and Use/Ethics Committee [referred to as the "Committee" from this point forward] and veterinary staff must ensure that all surgical preparation and postoperative analgesia are performed in a manner consistent with the recommendations of the Guide."

What's the purpose of an SFI?

SFIs serve several important purposes. Because laboratory animal science and medicine

are rapidly evolving fields, AAALAC International has a responsibility to help keep accredited organizations apprised of changes in approach and good practices—particularly those that have evolved since the last edition of the *Guide for the Care and Use of Laboratory Animals* was published in 1996. AAALAC Council members visit hundreds of animal care and use programs each year, acquiring a broad knowledge base, and they are intimately familiar with AAALAC's Reference Resources. The SFIs they offer in their report back to you are meant for your consideration—as **ways to enhance the quality of your program**.

SFIs are also used to **draw attention to recommendations in the Guide**. The *Guide* outlines performance-based recommendations that will help you maintain a quality animal care and use program. The Council may use SFIs to point out one or more "*shoulds*" described in the *Guide* and other Reference Resources that they believe will benefit your organization.

An SFI might also be used to **bring your attention to minor points of non-conformance** with animal welfare regulations, legislation or policy. If the site visit team notes a minor non-conformance (such as an administrative or paperwork matter) that is not part of a larger systemic problem, the SFI is simply used to bring it to your attention.

Remember, AAALAC's Council on Accreditation visits and reviews hundreds of programs each year. This gives Council members access to a deep well of good ideas and practices. SFIs are an excellent **venue for sharing good ideas and practices** that may help you enhance your program.

What references and guidelines are SFIs based on?

Council members base SFIs on a number of resources including:

... it's important to remember that AAALAC International accreditation is a commitment to meet standards higher than what's required by law. Participation in AAALAC is completely voluntary, and offers those who choose to participate a tangible way to demonstrate that they have a program that satisfies more than minimum regulatory requirements. Implementing the SFIs offered by AAALAC is one way to achieve this.

- The *Guide*. This includes the *Guide's* "shoulds" discussed earlier.
- AAALAC International's list of Reference Resources which is available online at www.aaalac.org/accreditation/resources.cfm.
- Scientific literature such as *Laboratory Animals* and *The Journal of the American Association for Laboratory Animal Science*.
- National and supranational regulations, laws and policies (which apply to the program being evaluated) including the *Animal Welfare Act* and the Council of Europe's Directive 86/609.
- Generally accepted practices, particularly those that have evolved since the last edition of the *Guide* was published in 1996.

Here are some recent examples of SFIs:

- SFI based on generally accepted practices:
"Overall, individual animals' medical records, maintained in a computerized database, were excellent, with one exception. Surgery records did not include documentation of regular monitoring of physiologic parameters through recovery. Surgical record keeping should be improved to enhance the overall veterinary care program."
- SFI based on generally accepted practices:
"In Rooms X, Y, and Z of Building A, several large rooms housed singly caged macaques. Cages were mounted on only one wall in these rooms and the cages had solid side walls. Individual animals were unable to make visual contact with other macaques. Opportunities for conspecific social interaction and development of hierarchies within or between enclosures should be considered when deci-

sions about cage arrangements are made. The institution is encouraged to consider facilitating visual contact between animals."

- SFI based on one of AAALAC's Reference Resources:
"While an effective occupational health and safety program was in place, including a comprehensive training orientation program and a formal risk assessment evaluation, the program did not include maintenance and custodial personnel who entered the animal facility on a routine basis. Risk assessment evaluations should be considered for these other individuals who have access to the animal facilities." (Occupational Health and Safety in the Care and Use of Research Animals, NRC 1997, pages 129-30)

- SFI based on the *Guide*:
"Council acknowledges the development of a disaster guideline. However, specific disaster plans tailored to individual facilities, as needed, had not been developed or implemented. The Guide states that a disaster plan that takes into account both personnel and animals should be prepared as part of the overall safety plan for the institution. The institution should prepare a disaster plan to conform with the Guide."

How should SFIs be addressed?

You are under *no* obligation to respond to SFIs, and there are no repercussions for not addressing them. However, you are welcome to respond to—or disagree with—any SFI through a Post Site Visit Communication (PSVC). A PSVC must be made in writing and should be sent to the AAALAC International office. A PSVC is typically sent



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10 business days after the site visit in response to issues or concerns raised by the AAALAC site visitors during their exit briefing with you and your staff. Alternatively, you may describe any program modifications made in response to the SFI(s) in your Annual Report to AAALAC.

It's important to remember that if you state in a PSVC or your Annual Report that you are going to make changes based on a possible SFI presented at the exit briefing or appearing in Council's letter to your institution, then it becomes a *written promise* to AAALAC International. Council will then expect your institution to keep this promise, unless otherwise notified.

SFIs are proposed in an effort to enhance your animal care and use program. Since the Committee is charged with oversight of your institution's program, the Committee is probably the most appropriate body to make the decision *not* to follow suggestions from AAALAC.

If we do not address an SFI, does it automatically become a "mandatory item for correction" during our next site visit?

No, an SFI does not automatically become a mandatory item for correction during the next site visit cycle, *unless* it becomes one of numerous SFIs within the same program area that collectively signal a broader problem with a major element of the animal care and use program. For example, an organization might receive the following SFI:

"Environmental conditions in feed storage areas occasionally exceeded 70° F and reached humidity levels of up to 75% during the summer months. The Guide states that exposure to temperatures above 70° F and extremes in relative humidity hasten the deterioration of food. Environmental conditions and storage practices should be evaluated to ensure that food of adequate nutritional quality is being provided."

This would not become a mandatory item for correction during the next site visit cycle unless this problem and additional deficiencies in animal husbandry were found during the next site visit that indicated a larger (perhaps systemic) problem with the effectiveness of the animal husbandry program. This could then become a mandatory item for correction along with the other items identified as part of the mandatory finding.

How do SFIs benefit my institution?

One of the primary benefits of participating in the AAALAC International accreditation program is benefiting from the knowledge and expertise of the site visit team. The suggestions they offer can serve as a valuable adjunct to your organization's own commitment to continuous improvement. SFIs help keep you and your staff apprised of evolving good practices, especially those that may not be addressed in the *Guide*, which is now more than a decade old.

You may also be able to use SFIs to validate for other members of your administration the need for additional equipment, staff, facility improvements, or other programmatic changes. AAALAC's independent, third-party review of your program provides the "outside" expert opinion administrators often seek before expending funds in these areas.

Finally, it's important to remember that AAALAC International accreditation is a commitment to meet standards *higher* than what's required by law. Participation in AAALAC is completely voluntary, and offers those who choose to participate a tangible way to demonstrate that they have a program that satisfies more than minimum regulatory requirements. Implementing the SFIs offered by AAALAC is one way to achieve this.

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