

**University of Pennsylvania-Radiology  
Small Animal Imaging Facility Steering Committee  
Standard Operating Procedure**

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**Title: Operational Deficiencies and Repeat Violations**

**SOP Number:** 6.01

**Revision Number:** 2

**Effective Date:** August 11, 2005

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**Approval:** \_\_\_\_\_  
Co-Director

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Co-Director

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I. **Purpose:** The purpose is to provide the policy when dealing with operational deficiencies and repeat violations of established SOPs during the imaging studies at the Small Animal Imaging Facility (SAIF).

II. **Responsibilities and Scope:** All researchers who are involved in animal imaging studies at the SAIF are responsible for reading and following this SOP. To reduce conflicts with researchers, the principal responsibility will belong to the Principal Investigators (P.I.) and not their associates, post-docs, and technicians.

III. **Definitions:**  
None

IV. **Procedures:**

A. On a yearly basis, Small Animal Imaging Facility Steering Committee (SAIFSC) will choose a departmental official (i.e., Director of Animal Studies) with the authority to supervise and police all animal imaging studies at the Penn-Radiology imaging facilities to minimize operational deficiencies and any violations of established protocols.

B. The departmental official must report the circumstances and actions taken in the following instances:

1. Any serious or continuing noncompliance with PHS Policy
2. Any serious deviation from the provision of the Guide
3. Any suspension of activity by the IACUC

C. SAIFSC has developed the following guidelines to identify incidents of serious noncompliance. These violations will be reported to the Penn-IACUC through the departmental official. A serious incident of noncompliance is understood as one where the welfare of animals or personnel is jeopardized.

**V. Directions:**

- A. If a repeat violation occurs and the second violation has been documented, the subsequent incident will be reported by the departmental official to the SAIFSC. A “Three strikes” rule will be applied for all researchers.
- B. The following examples should not occur under any circumstances:
1. The use of animals without IACUC approval
  2. Failure to use aseptic procedures during survival surgery on experimental animals prior to imaging studies
  3. Failure to correct previously identified noncompliant or questionable procedures
  4. Housing of animals outside the University of Pennsylvania animal facilities without IACUC approval for more than 12 hours
  5. Personnel performing surgical procedures without proper supervision when special training requirements are not met
  6. Major modifications of an approved protocol without prior IACUC approval
  7. Failure to alleviate pain or distress of an animal when the exception has not been approved by the IACUC
  8. Failure to confirm the death of euthanized animals
  9. Failure to log the required information on the sign-up schedule sheet in a timely manner (i.e., prior to use of any animal preparation rooms for imaging studies)
  10. Failure to clean the animal preparation rooms after use
  11. Failure to follow the proper protocols on the transporting and moving of animals for imaging studies (refer to “SAIF-SOP #4.01”)
- C: To reduce conflicts with researchers the principal responsibility will belong to the Principal Investigators and not their associates, post-docs, and technicians. A “three strikes” rule will be applied to all Principal Investigators. Principal Investigators’ privilege to use the Penn-Radiology imaging facilities and animal preparation rooms for their animal studies will be revoked by the departmental official. Moreover, the most recent violation will be reported to the Penn-IACUC. This may lead to immediate termination of the violators’ animal studies. Proper warning will be given if

a violation has occurred. In all cases, the Steering Committee will review the violations after two-strikes.

**VI. Safety Considerations:**  
None

**VII. References:**  
None

**VIII. Attachments:**  
None

**IX. Document History:**

<b>Version Number</b>	<b>Effective Date</b>	<b>Author</b>	<b>Reason</b>
1	August 11, 2005	I. Lee	New
2	September 8, 2005	I. Lee	Revised
3	November 10, 2005	I. Lee	Revised