



When Audits Collide: The Big Bang Theory of Auditing

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Do Audits Collide?

- What is the Big Bang Theory of Auditing?
- How do you create a compliant Animal Care Program (ACP)?
- Redundancies or Synergies?
- Why does PAM makes sense?
- What is the view of Auditing from Outer Space?
- What is a Culture of Compliance?



Why the Big Bang Theory of Auditing?

- ACPs are subject to multiple internal and external audits
 - Internal: Semi-annual inspection, facility rounds, GLP QA, management rounds
 - External: USDA, State, FDA, AAALAC(?)
- What does PAM bring to the table?
 - The missing piece
 - The driving force behind the formation of a cohesive program with a culture of compliance



Why PAM?

- Agency transparency, knowledge sharing
 - Impact of Age of Enforcement
 - Impact of interagency communications re: Non Compliance Items
 - More information accessible to more people
 - FOIA
 - Office of Inspector General (OIG) audit 2014
 - Recommendation: add PAM to Animal Welfare Act Regulations
 - Formal statement PAM sits under IACUC; misc. duties
 - What does this mean for us?



Creating a Compliant Animal Care Program

- Building PAM so it is complementary
 - Avoid redundancies
- What does PAM add
 - Reduce the number of non-compliance; catch them before the agencies do
 - Before all other inspections;
 - run an audit before the agencies are due to visit or during processing of annual report
 - Checking protocols- increased number over USDA or AAALAC, Use a risk based triage system (HCR vs. LCR)
 - Conducting in-life observations during PAM audits
 - Limiting the burden and the liability



You can't ensure
compliance through
auditing.



Creating a Culture of Compliance

- Have a global perspective
 - Take a birds-eye view—see the complementary relationship in all the audits
- Prospective instead of retrospective
 - Set the tone for compliance
 - Catch the gaps in program or protocols
- Share trending data – recommend policies and training
- Partner with scientists (customers)
 - Ask about their project
 - Be a resource for information