



ENVIRONMENTAL HEALTH AND SAFETY
STANDARD OPERATING PROCEDURES

SOP No. 15.99.05.W1.06AR WTAMU Emergency Operations for Institutional Animal Care and Use (Vertebrate Animals)

Approved: July 27, 2013
Last Revised: December 6, 2018
Next Scheduled Review: December 6, 2023

Environmental Health and Safety at WTAMU is composed of two distinct but integrated environmental safety departments that report to the Vice President of Research and Compliance. Academic and Research Environmental Health and Safety (AR-EHS) is responsible for research and academic related compliance, which includes laboratory and academic research and the associated compliance committees. Fire and Life Safety (FLS-EHS) is responsible for fire related compliance and conducts fire and life safety inspections of campus buildings and assists with the testing all fire detection and suppression systems. General Safety (GHS-EHS) promotes safe work and health practices, to all faculty, staff, students, and visitors. Examples of General Health and Safety components include: office safety, proper lifting techniques, trip, and fall prevention.

Contents

Purpose2
Policy Statement2
Animal health checks and health maintenance2
Food and water supplies2
Sanitation:3
Environmental support (ventilation, temperature control, utilities)3
Personnel to provide animal care3
Evacuation of Animals4
Lockdown / Shelter-In-Place5
Natural Disasters – Floods, Earthquakes, Tornados, Hurricane, Fire, or Winter Storm6
HVAC Loss6
Overheating6
Loss of Heat6
Animal Rights Activist: Protests / Picketing6
Emergency Supplies7
Emergency Operations for Institutional Animal Care and Use Training8
Responsibilities8
Record Retention9
Appendix A: Emergency Contact Information & Resources10
Appendix B: Checklist of Disaster Planning Expectations12

Purpose

West Texas A & M University (WTAMU) is committed to ensuring that vertebrate animals used in research are treated in a humane, ethical manner, with the highest standard of care according to applied federal, state, and institutional regulations and policies. This policy is intended to provide WTAMU's Institutional Animal Care and Use Committee (IACUC), faculty, staff, students, and CREET a general plan of action in the event of an emergency or disaster with potential impact to the animals housed in campus laboratories or in WTAMU associated animal care facilities, to include the Nance Ranch, WTAMU Feedlot, WTAMU Horse Center, the Buffalo Mascot facility, and CREET entities.

The Panhandle oriented "Cooperative Research, Educational and Extension Team (CREET)" includes West Texas A & M University, Texas AgriLife Extension Service, Texas Veterinary Medical Diagnostic Laboratory and USDA-Agricultural Research Service. Due to the cooperative research between WTAMU and CREET, in December 2011, WTAMU and CREET agreed to combine their IACUC project into one comprehensive program to be administered by WTAMU.

The intent of this policy is to protect and manage the animals on campus in the event of an emergency; however, under no circumstances should any employee put themselves at risk or personal danger at any time. This policy will be used to supplement the WTAMU Emergency Operations Plan of each entity (EOP) and is written to comply with the [Eighth Edition of the Guide for the Care and Use of Laboratory Animals \(Guide\)](#).

Emergencies, accidents and injuries can occur at any time. Being prepared is key to minimizing the effects of emergency situations on the health and well being of people and animals.

Policy Statement

All personnel must comply with WTAMU emergency preparedness plans. The sections below detail how emergencies will be handled within the animal facilities – and are supplementary to the WTAMU Emergency Management Plan.

Overview of Animal Care & Support Needs During Emergencies

Animal health checks and health maintenance:

Animals should be checked daily to confirm they are healthy. These observations may be performed by qualified WTAMU Principle Investigators (PIs) or other qualified personnel designated by the PI. The WTAMU's attending veterinarian or consulting veterinarian will triage sick or injured animals and determine a treatment plan. Animals that cannot be relocated or protected from the consequences of a disaster must be humanely euthanized. When appropriate, animals will be euthanized at the discretion of the attending veterinarian or designee using American Veterinary Medical Association (AVMA) approved methods of euthanasia.

Food and water supplies:

Food and water are critical to maintaining animal health. The appropriate food for the species and research needs, in adequate quantities, in unadulterated form, is the goal of this plan. If the usual food is not available, professional judgment must be applied to identify acceptable substitutes, which are available. Water is

especially important, as many animals can survive for several days with little food, but may succumb within 1-2 days without water. Some species are especially sensitive to food or water deprivation (e.g., new born rats or mice) and should be given special attention.

Sanitation:

For purposes of animal health, animal welfare and support of research, adequate sanitation must be provided. Cages of some species must be changed often while others may go several days without inducing health or environmental problems. The goal of this plan is to approximate normal sanitation schedules with available resources. Increasing cage change intervals, spot cleaning instead of whole-cage changes, changing bedding instead of cage changes, hand washing of some equipment, or deferring activities such as floor mopping may be required. The WTAMU attending veterinarian or designee and/or the PI will decide which sanitation activities are performed in order to provide the greatest benefit to the animals if it is not possible to perform all normal activities due to unusual or emergency conditions.

Environmental support (ventilation, temperature control, utilities):

Maintenance of an appropriate environment is essential to the well-being of animals and for many research projects. Ventilation problems may include loss of or diminished air supply or exhaust, loss of pressure differentials in critical areas, unacceptable temperature variations, contamination with agents such as chemicals or smoke, or loss of utilities such as electricity needed for lights or powered equipment (e.g., hoods, autoclaves, ventilated racks). Ventilation problems should be addressed by WTAMU attending veterinarian or designee and/or the PI, with goals of: maintaining at least some air movement in animal housing spaces, sustaining air pressure differentials in all rooms including the barrier area and keeping temperatures as close to the acceptable range as is possible. The minimal standard is to prevent animal deaths or contamination of the environment.

Personnel to provide animal care:

Personnel with adequate training are essential to maintaining animal colonies. They may be unable to work in facilities due to damage or dangerous conditions, physical obstructions (snow storm or chemical spill nearby), or interruption of work (bomb threat, picketing, etc.). The Principle Investigator or designee will deploy available personnel to maintain animal health and well-being under the direction of the attending veterinarian or designee. Personnel may be asked to perform duties outside the scope of their normal responsibilities in order to protect animal health or well-being. The WTAMU attending veterinarian or designee, with consultation as needed from Institutional Animal Care and Use Committee and animal facility administrative personnel make these decisions. As soon as possible after a disaster, or prior to the incident when possible, a list of current/essential personnel that may need to access campus and the animal facilities should be provided to the West Texas A & M University Police Department (UPD) dispatch so they may further distribute it to local, state or federal authorities that may control access including road closures.

Evacuation of Animals

Disaster preparedness includes successful evacuation and care for both people and animals. Safe evacuation of all people from the designated area is the priority goal for all responding agencies.

WTAMU does not have a back-up facility prepared to evacuate all animals in the event of an emergency. However, evacuation will be considered based on the details of the disaster, type of animal, and feasibility of evacuation or relocation. The decision to evacuate animals will be made in consultation with the attending veterinarian or designee, Institutional Animal Care and Use Committee, Institutional Official, and administrative personnel related to the animal facility.

Scenarios where evacuation of an animal may be appropriate include:

- Evacuation following an emergency that resulted in damage to the animal facility rendering it not suitable for continued housing of animals.
- Pre-evacuation in the event of foreseeable disaster.

If there is an immediate threat to human health or safety – Do not attempt to evacuate animals. Concern for animals is secondary to human life. Humans should never place themselves in danger related to efforts to evacuate animals.

- If you are working with animals near the cages and time permits, put the animal(s) back in their cage(s).
- If you are in the middle of surgery, euthanize the animal if there is time. Every effort should be made to confirm that the emergency is legitimate prior to euthanizing the animal.

If evacuation of the animals (which may not be practical) is being considered to avoid an emergency or hazard, please coordinate with WTAMU UPD and the WTAMU Emergency Plan evacuation procedures, places, and routes. In the event relocation is required, the animals will be moved to another appropriate on-campus location (temporarily) or an appropriate off campus site, if necessary.

Since many animals may not be able to be evacuated, the PI and associated facility administration (Dean/Department Head) should decide which are the most critical to evacuate, if possible. The PI and associated facility administration should be prepared to communicate actions to WTAMU UPD and Environmental Health and Safety in an emergency. All researchers are advised to cryopreserve sensitive lines off campus. Finally, animals requiring biohazard housing may not be removed from the animal facility without direct approval from Institutional Official, Environmental Health & Safety (EHS) and/or the attending veterinarian or designee.

In the event of a catastrophic emergency, injured or affected animals will be triaged by trained animal care personnel (veterinarians, principle investigators and/or research staff). Treatment will occur on site, if possible, or after evacuation to a predetermined area/site. Those animals with injuries too severe to recover will be humanely euthanized.

NOTE: Any animal cage evacuated from the animal facility should have cage card information taped onto the cage with clear tape and/or cage card information written directly onto the cage with permanent marker as soon as possible.

After an evacuation of personnel, the responsible person should report animal evacuation to EHS or the Chief Research Officer who will report to the WTAMU UPD Incident Command Post (ICP) to make the Incident Commander (IC) aware of the situation, and then work together to determine when it is safe to return to the area with the animals.

Lockdown / Shelter-In-Place

The term lockdown or “shelter-in-place” means to seek immediate shelter and remain there during an imminent event instead of evacuating. There are occasions when the option to evacuate the area cannot be considered. Unless otherwise instructed to evacuate, sheltering in a pre-determined safe location is the preferred method of safely waiting out events. Windows, doors and HVAC systems in the designated area should be closed.

A second definition of “Sheltering in Place” may be used to describe when animal care personnel decide ahead of time to come to or remain in the facility for longer than a normal shift. For example, when extreme weather is predicted, such as a severe snow storm, which may prevent transportation or limit access to the animal facility, sheltering in place may be needed to provide animal care. The principle investigator and associated administrators, with assistance from the attending veterinarian, will coordinate to ensure that someone is available to care for the animals and that supplies such as food, water, and bedding are available for the individual(s) and animals remaining at the facility. If such a decision is made, the principle investigator or associated administrators will notify UPD of the exact area where personnel remain; this is especially important when the University is “closed.”

Generally, the amount of feed kept in house (including food on cages, food in room, feed supply bins and food in feed storage room) is projected to be an adequate supply to allow for any potential delays in feed shipment. Loss of power will be managed with emergency lights (flashlights and generators) – and in collaboration with the WTAMU Physical Plant office. In the event that an emergency weather situation is likely during the workday, the principle investigator or designee will closely monitor the e-mail weather bulletins and campus emergency broadcast system (Buff Alert). Animal care staff will be reassigned work tasks to assure that all critical tasks are completed (feed, water, security of animals) and then nonessential personnel will be sent home (timing to be consistent with recommendations from weather bulletin sources). For after-hours emergencies, animal care staff should call WTAMU UPD.

Prior to a winter storm, where possible, cages should be topped off with food and fresh water – as appropriate to the species. For example, rabbits, which are usually fed once per day, may be given full hoppers of food. Rodent cage hoppers may be filled to the maximum and full water bottles provided the day before the expected storm even if it is not a normal water change out day. Treated water may be held in clean containers in the facility.

When serious inclement weather is forecast, some of the animal facility staff members who live close to the facility or who have access to safe and appropriate transportation may be assigned to come to work. Animal facility staff may also stay at close by hotels such as the Holiday Inn Hotel or in an on-campus residence, if available.

Natural Disasters – Floods, Earthquakes, Tornados, Hurricane, Fire, or Winter Storm

Surgical procedures should not be conducted if there is advance notice of a potential disaster. Animal handling during or after a flood, earthquake, tornado, hurricane, fire, or winter storm:

- If possible, leave rooms where hazardous materials and anesthetic agents are located (e.g., preparation room, necropsy room).
- Secure radiation sources and other hazardous materials.
- If possible, turn off all gas lines and cylinders.
- If you are working with animals near the cages and time permits, put the animal(s) back in their cage(s).
- If you are in the middle of surgery and required to evacuate, euthanize the animal if there is time. The PI or designee shall confirm with UPD, EHS, or facility/college administration that the emergency is legitimate prior to euthanizing the animal.
- After the area has been deemed safe by the Incident Commander (IC)/WTAMU UPD, animal care staff will be permitted inside the building to assess the need for evacuation of animals, relocation or if humane euthanasia is required.

HVAC Loss

If the animal room environment cannot be maintained within *Guide* parameters - [Eighth Edition of the Guide for the Care and Use of Laboratory Animals \(Guide\)](#) - the animals may need to be relocated. Contact WTAMU UPD and Physical Plant for assistance. Additionally, contact the associated animal care PI, Administrators (Department Head and/or Dean), and EHS. EHS has a list of all laboratories and associated PI's.

Overheating:

- 1) Move animals to rooms that are not over heating or to the hallway, if it is cooler.
- 2) If the whole animal facility is overheating, mobile cooling stations/fans can be utilized to reduce the heat load.
- 3) If animal rooms cannot be cooled, the P.I., associated college administrators, EHS and attending veterinary (or designee) will collaboratively determine appropriate steps, e.g., to relocate or euthanize the animals if they are in distress.

Loss of Heat:

- 1) Move animals to rooms that have heat or to the hallways, if it is warmer.
- 2) Use auxiliary heaters in animal rooms that have no heat.
- 3) If animal rooms cannot be warmed, or a warm place within the animal facility cannot be found, the P.I., associated college administrators, EHS and attending veterinary (or designee) will collaboratively determine appropriate steps, e.g., to relocate or euthanize the animals if they are in distress.

Animal Rights Activist: Protests / Picketing

In the event of protests or picketing (by animal rights groups, for example), animal facility personnel are to report to work as usual. In doing so, they are to avoid confrontations if

they pass through picket lines or protest marchers. West Texas A & M University Communications Office will handle the dissemination of information and address questions about research activities. UPD will handle all security related issues, and will increase security measures for all animal housing and support facilities while helping keep all facilities secure. Contact WTAMU UPD for any needed assistance. Additionally, contact the associated animal care PI and college administrators (Department Head and/or Dean), and EHS.

- 1) Animal health checks: If the number of employees on site is decreased, priority is given to activities which directly affect animal health and welfare: health checks and treatments, feeding, watering, and maintaining minimal sanitation requirements.
- 2) Food and water supplies: Food and water supplies on-site should not be affected. Closing the receiving dock and deferring delivery locations may be considered if primary location is unusable. Similarly, if the normal waste pick-up procedure is disrupted, waste may be taken out through a different exit location, or kept in cold storage temporarily.
- 3) Sanitation: Sanitation should proceed normally, assuming sufficient personnel are present. If staff shortages occur, sanitation will be prioritized as described in animal health checks above.
- 4) Environmental support: Environmental systems are not expected to be affected. If the environment is altered, as by sabotage, for example, the specific problem will be addressed as described in the section for that emergency (see: HVAC, Bomb Threat, Electrical power outage).
- 5) Personnel: WTAMU personnel are expected to report to work. WTAMU personnel may be required to perform duties outside their usual responsibilities in order to preserve animal health. The attending veterinarian or designee will adjust duties as needed.

Emergency Supplies

An animal facility/laboratory should keep on hand a minimum of two days food and water to provide proper care for animals in the event of a disaster.

Additional supplies that should be kept on hand include:

- Drinking water and food for faculty and staff (campus maintains supplies due to on campus housing of students and personnel).
- Flashlight and extra batteries
- Utility knife or scissors
- Appropriate personal protective equipment
- Sanitation needs (such as tissue paper, bleach, plastic bags, plastic bucket)
- Duct tape and/or barrier tape
- Communication equipment – computer and phone (with associated batteries)
- Whistle
- Campus and area maps
- Personal first aid kit

Key WTAMU personnel contact information should be maintained and be accessible by all those associated with animal facilities. The information can be found on in the appendix of this Emergency Operations for Institutional Animal Care and Use standard operating procedure. PI's are requested to keep this document in an accessible location. Additionally, all animal laboratory or facility participants should be aware of the locations of WTAMU emergency information, telephones, fire extinguishers, first aid kits/supplies, eye wash stations, or other emergency materials.

Emergency Operations for Institutional Animal Care and Use Training

All animal program employees will be assigned Emergency Operations for Institutional Animal Care and Use standard operations procedure training upon hire. West Texas A & M University Environmental Health and Safety will follow the Texas A & M University System Policy [33.05.02 Required Employee Training](#). Staff and faculty whose required training is delinquent more than 90 days will have their access to the Internet terminated until all trainings are completed. Only Blackboard and Single Sign-on will be accessible. Internet access will be restored once training has been completed. Student workers whose required training is delinquent more than 90 days will need to be terminated by their manager through Student Employment.

Responsibilities

The primary oversight responsibilities in the Emergency Operations for Institutional Animal Care and Use Standard Operating Procedure rest with the following:

- A. The IO or "Institutional Official" is the person in the organization having the administrative and operational authority to commit institutional resources to ensure that the animal care and use program complies with requirements of the Animal Welfare Act Regulations. At WTAMU, the IO is the Chief Research Officer who reports to and coordinates directly with the CEO.
- B. WTAMU IACUC – The Institutional Animal Care and Use Committee (IACUC) is charged with the protection of animal subjects used in research at the University by complying with regulations specified by the Animal Welfare Act, and operating under the U.S. Department of Agriculture Animal and Plant Health Inspection Services, as well as with other ethical and professional standards. The IACUC annually reviews and approves the Emergency Operations for Institutional Animal Care and Use Standard Operating Procedure.
- C. WTAMU Environmental Health and Safety (EHS) – provides the necessary programmatic and activity-specific guidance to address applicable environmental protection; promote student, faculty, and staff safety and health requirements, advance best management practices, support compliance with all university research issues involving Institutional Review Board for Human Subjects, IACUC (including assisting with animal disaster planning, training, and implementation), and the Institutional Biosafety Committee.
- D. Principal Investigator (PI) – is the lead researcher, scientist, or engineer for a particular laboratory or animal facility. The PI directs the associated animal research activities and ensures that animals are cared for according to IACUC protocols.

- E. Department and College Administration – individuals who have oversight and operational authority of the programs, departments, and/or colleges in which the PI and associated animal facilities reside.
- F. Attending Veterinarian is a person who “has graduated from a veterinary school accredited by the American Veterinary Medical Association’s Council on Education, or has a certificate issued by the American Veterinary Medical Association’s Education Commission for Foreign Veterinary Graduates, or has received equivalent formal education as determined by the Administrator; has received training and/or experience in the care and management of the species being attended; who has direct or delegated authority for activities involving animals at a facility subject to the jurisdiction of the Secretary”. The attending veterinarian sits on the WTAMU IACUC.

Record Retention

No official state records may be destroyed without permission from the Texas State Library as outlined in [Texas Government Code, Section 441.187](#) and [13 Texas Administrative Code, Title 13, Part 1, Chapter 6, Subchapter A, Rule 6.7](#). The Texas State Library certifies Agency retention schedules as a means of granting permission to destroy official state records.

West Texas A&M University Records Retention Schedule is certified by the Texas State Library and Archives Commission. West Texas A & M University Environmental Health and Safety will follow [Texas A & M University Records Retention Schedule](#) as stated in the Standard Operating Procedure [61.99.01.W0.01 Records Management](#). All official state records (paper, microform, electronic, or any other media) must be retained for the minimum period designated.

Related Statutes, Policies, or Requirements

[Animal Welfare Act \(9CFR\)](#)

[Eighth Edition of the Guide for the Care and Use of Laboratory Animals \(Guide\)](#)

Contact Office

WTAMU Environmental Health and Safety
(806) 651-2270

Appendix A: Emergency Contact Information & Resources

Life Threatening Emergency 911

Chief Research Officer/Institutional Official
Office: 806.651.2731

IACUC Chair (Contact EHS for information or website)
Office: 806.651.2270
<http://www.wtamu.edu/academics/wtamu-research.aspx>

Director, Academic and Research Environmental Health and Safety (AREHS)
Office: 806.651.2270

Dr. Robert Ballinger, attending veterinarian
Office: 806.655.2106

Dr. Chris Morrow, attending veterinarian
Office: 806.622.0803

University Police Department
Dispatch: 806.651.2300 or 911

Dean, College of Agriculture, Science, and Engineering
Office: 806.651.2586

Department Head, Agriculture
Office: 806.651.2563

Department Head, Life, Earth, Environmental Science
Office: 806.651.2573

Department Head, Sociology, Psychology, and Social Work
Office: 806.651.2597

A number of university programs and service organizations are available to help maintain and promote a safe and healthful work environment for the campus community.

Risk Management 806.651.2961
Emergency Operations Plan
<http://www.wtamu.edu/administration/risk-management.aspx>
<http://www.wtamu.edu/webres/File/University%20Police/WTAMU%20EOP-rev-August-2012.pdf>

Physical Plant: Facilities Operations and Maintenance 806.651.2133
<http://www.wtamu.edu/administration/physical-plant.aspx>

Office of Communication and Marketing 806.651.2129

Environmental, Health & Safety 806.651.2270

Information on various safety topics, including hazard evaluations and training
<http://www.wtamu.edu/academics/wtamu-research.aspx>

Office of Radiation Safety

806.651.2270

Information on radioactive materials and lasers
http://www.wtamu.edu/environmental_safety/faculty-sop.aspx

Holiday Inn Express Hotel

806.655.4445

<http://www.ihg.com/holidayinnexpress/hotels/us/en/canyon/cyntx/hoteldetail>

Appendix B: Checklist of Disaster Planning Expectations in the Guide and USDA
Regulations related to the Program of Animal Care at WTAMU

1. Define the actions necessary to prevent animal pain, distress, and deaths due to loss of systems such as those that control ventilation, cooling, heating, or provision of potable water. Guide p. 35
2. Animals that cannot be relocated or protected from the consequences of the disaster must be humanely euthanized. Guide p. 35
3. Identify essential personnel who should be trained in advance in its implementation. Guide p. 35, Personnel trained in emergency procedures for special facilities or operations. Guide p. 74
4. Access to essential personnel during or immediately after a disaster. Guide p. 35. In the event of an emergency, institutional security personnel and fire or police officials should be able to reach people responsible for the animals. Guide p. 74,
5. Prominently posting emergency procedures, names, or telephone numbers in animal facilities or by placing them in the security department or telephone center. Guide p. 74 Emergency procedures for handling special facilities or operations should be prominently posted. Guide p. 74
6. The colony manager or veterinarian responsible for the animals should be a member of the appropriate safety committee at the institution, an “official responder” in the institution, and a participant in the response to a disaster. Guide p. 75
7. Law enforcement and emergency personnel should be provided with a copy of the plan for comment and integration into broader, area wide planning. Guide p. 35
8. Threats that criminal activities such as personnel harassment and assault, facility trespassing, arson, and vandalism pose to laboratory animals, research personnel, equipment and facilities, and biomedical research at the institution. Guide p. 23
9. How the facility will preserve animals that are necessary for critical research activities or are irreplaceable. Priorities for triaging animal populations... Guide p. 35
10. Research facilities must develop, document, and follow an appropriate plan to provide for the humane handling, treatment, transportation, housing, and care of their animals in the event of an emergency or disaster (one which could reasonably be anticipated and expected to be detrimental to the good health and well-being of the animals in their possession). USDA
11. (i) Identify situations the facility might experience that would trigger the need for the measures identified in a contingency plan to be put into action including, but not limited to, emergencies such as electrical outages, faulty HVAC systems, fires, and animal escapes, as well as natural disasters the facility is most likely to experience. USDA
12. (ii) Outline specific tasks required to be carried out in response to the identified emergencies or disasters including, but not limited to, detailed animal evacuation instructions or shelter-in-place instructions and provisions for providing backup sources of food and water as well as sanitation, ventilation, bedding, veterinary care, etc.; USDA
13. (iii) Identify a chain of command and who (by name or by position title) will be responsible for fulfilling these tasks; USDA

14. (iv) Address how response and recovery will be handled in terms of materials, resources, and training needed. USDA
15. (2) For current registrants, the contingency plan must be in place by July 29, 2013. For research facilities registered after this date, the contingency plan must be in place prior to conducting regulated activities. USDA
16. The plan must be reviewed by the research facility on at least an annual basis to ensure that it adequately addresses the criteria listed in paragraph (l)(1) of this section. USDA
17. Each registrant must maintain documentation of their annual reviews, including documenting any amendments or changes made to their plan since the previous years review, such as changes made as a result of recently predicted, but historically unforeseen, circumstances (e.g., weather extremes). USDA
18. Contingency plans, as well as all annual review documentation and training records, must be made available to APHIS and any funding Federal agency representatives upon request. USDA
19. The facility must provide and document participation in and successful completion of training for its personnel regarding their roles and responsibilities as outlined in the plan. USDA
20. For current registrants, training of facility personnel must be completed by September 27, 2013 for research facilities registered after July 26, 2013, training of facility personnel must be completed within 60 days of the facility putting its contingency plan in place. Employees hired 30 days or more before the contingency plan is put in place must also be trained by that date. USDA
21. For employees ..., training must be conducted within 30 days of their start date. USDA
22. Any changes to the plan as a result of the annual review must be communicated to employees through training, which must be conducted within 30 days of making the changes. USDA