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OV TB Testing Audit

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Background

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1. An enhanced field audit programme of bovine tuberculosis (TB) skin testing conducted by Official Veterinarians (OVs) is to be introduced in 2013.

2. Animal Health and Veterinary Laboratories Agency's (AHVLA) approach will be to work with employers of OVs who undertake tuberculin testing work to review the OV instructions for TB testing in bovines (standard operating procedure (SOP)) and corrective action matrix for TB testing.

3. AHVLA field audits will spot-check the testing performance of the

Documents

- ▶ [TR314 -TB Quality Assurance Test: Assessment Guide](#)
- ▶ [TR315 - TB Auditing Standard Operating Procedure](#)
- ▶ [TR384 - TB Testing Audit of Official Veterinarians Satisfactory \(Compliant\) Audit Findings Letter](#)
- ▶ [TR385 - TB Testing Audit of Official Veterinarians Non Compliant Audit Finding Letter](#)
- ▶ [TR387 - Field Audit of Official Veterinarians Categories of Non-Compliance with Procedures](#)

OVs employed by those practices using a risk-based approach over a period of seven years. This will inform the development of a comprehensive audit programme that will be designed to assess all OVs over a designated period. Practice liaison visits will supplement the field audits where appropriate. This will provide the following benefits:

- make transparent TB testing procedures and standards
- sharing of good health and safety practice for undertaking TB tests, with reference to the OV Instructions ([Skin Test Day One, Skin Test Procedure](#))
- maximise the probability of accurate TB disease disclosure
- improved partnership working between AHVLA, OV practices and OVs
- support shared responsibility for setting and improving testing standards
- build confidence in the efficacy of the TB testing procedure and practice
- recognise and potentially reward diligent OV practices and OVs
- assist with meeting EU Commission requirements for assurance of TB testing
- provide evidence in support of continued EU co-financing for TB eradication (England and Wales only)
- build consumer confidence in the implementation of food safety controls.

4. Where OV non-compliance with the instructions is found at spot-check audits of testing performance, corrective action will be taken in respect of the individuals concerned in accordance with Categories of Non-Compliance with Procedures (TR387).

5. Additionally, AHVLA will review with the responsible OV practice the management of its staff regarding the test instructions. AHVLA will reserve the right to require removal from Panel 1a and retraining of other practice members if practice management of the adherence of its staff to the instructions is found to be deficient.

Responsibilities

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1. AHVLA Veterinary Leads (VLs including Regional Veterinary Leads

(RVLs)) Country Directors:

- selection of AHVLA veterinary staff for carrying out audits
- selection of criteria for practices and individual OVs for audit
- ensuring that auditors are familiar with TB testing procedures and field audit requirements before carrying out any audits
- ensuring that OV practices have received sufficient training in TB skin testing and reporting, that they have access to the instructions and that they are aware of the auditing process
- ensuring that the auditors have themselves been successfully audited under the AHVLA Quality Assurance (QA) programme
- ensuring a review of all audit findings
- ensuring appropriate sanctions are taken to address unsatisfactory visits
- ensuring a letter is sent to the practice principal, detailing the audit findings and action taken or required
- ensuring a copy of the report is sent to the OV Team in Worcester Specialist Service Centre (SSC)
- ensuring appropriate Regional communications with OVs and representative farming bodies
- notifying the OV Team of Panel 1a members who no longer carry out TB testing.

2. AHVLA Field Managers (FMs):

- allocating practice reviews and audits to AHVLA veterinary staff for completion
- ensuring the appropriate weekly work recording code is used to capture accurately the time spent on the audit process
- record keeping of the audit programme (actual and scheduled)
- ensuring production of appropriate Management Information reports.

Selecting Official Veterinarians/TB Tests for Audit [top](#)

1. Individual OVs may be selected for audit on the basis of intelligence and/or data that raises concerns about their TB testing performance. Attention will primarily be directed towards OV practices or individuals who deliver a high volume of testing and/or where testing outcomes

differ from the regional norm. The following are examples of warning indicators that would trigger a field audit visit:

- the initial audit for an OV newly appointed to Panel 1a
- a request for intervention and or support from an OV practice
- following retraining of an OV temporarily removed from Panel 1a
- high OV practice and or individual OV TB testing volumes
- testing data e.g. no increases in skin thickness recorded or consistently high numbers of cattle tested by a single operator
- local intelligence including farmer complaints, persistent errors on test reports
- where there is a poor level of understanding and or engagement with standards or process by an OV practice or an individual OV
- when evidence of non compliance is found at the OV practice in relation to the management of TB testing VLs have discretion to audit OVs employed by the practice
- testers of high risk herd in Scotland (OVs that do post movement testing and annual Whole Herd Test (WHT) in Scotland)
- practices which do not notify test dates consistently on Sam.

2. OV practices will be asked to enter test dates on Sam. If this is not occurring then they will be asked to notify their local AHVLA office, every Monday morning, of TB tests arranged for that week and the week following.

3. There will be cross-checks between these notifications and subsequent claims for payment. If tests are not pre-notified, this will be taken into account in targeting of subsequent tests. The following details will be required:

- CPH and name of farmer
- location of test
- date and start time of test (Day One)
- date and start time of reading (Day Two)
- number of animals
- name of OV.

Field Audit Procedure

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1. Audits will usually be unannounced and may be carried out on

either Day One and/or Day Two of the TB test.

2. Auditors will need to be present at the test long enough to be assured that key elements of the test are being carried out in accordance with requirements.
3. Field TB test audits should be carried out in accordance with the OV TB Auditing SOP (TR315) and the Assessment Guide (TR314).
4. The areas shown on the SOP and Assessment Guide will be assessed as far as possible, depending on the stage the test is at when the auditor arrives and the length of time required for the auditor to be satisfied that testing is being carried out in accordance with the requirements.
5. Assessment of paperwork and/or follow-on actions by OV's after the test will form part of the audit.
6. In all cases, an audit report (TR292) will be completed, which will detail the areas that have been assessed.
7. When completed, a copy of the report will be sent to the appropriate VL. The VL will be responsible for undertaking a timely review of all audit reports to assure quality and completeness and, in particular, any actions relating to unsatisfactory audit findings.
8. A copy of the report will be sent to the OV Team, Worcester SSC.
9. In all cases, a letter (TR384 or TR385) will be sent to the OV practice principal, detailing the audit findings and any action taken or required.
10. AHVLA Auditing Officers will:
 - refer to the SOP (TR315) for the individual areas to be assessed and the assessment guidance for the standards against which the procedures should be judged
 - assess as far as possible all criteria on the assessment form and tick all of the relevant boxes
 - in the event that circumstances prevent certain criteria from being assessed, mark the affected boxes with an 'O' instead of a tick.

11. As an absolute minimum, auditors will check that:

- equipment is clean and functioning
- cattle are being/have been clipped in accordance with the correct procedure
- callipers are being used correctly and all necessary measurements are being made and recorded
- paperwork is available and being completed correctly.

12. It is not necessary for auditing officers to stay for the duration of the test, only for as long as is considered necessary to judge whether the test is being completed satisfactorily.

Sanctions for Non-Compliance with Requirements[top](#)

1. Sanctions for non-compliance with TB testing requirements will be assessed on a case by case basis. Depending on the nature of the non-compliance, the action taken may include the following (not necessarily in this order):

- advice (verbal)
- correction at the time
- putting animals back through the crush
- advice (written)
- re-training
- non-payment for test
- removal from Panel 1a
- request improvement plan
- interview with practice principal
- refer for investigation
- suspension from Panel 1a
- suspension from all OV panels
- referral to the Royal College of Veterinary Surgeons (RCVS).

2. A description of potential corrective actions and how they may apply is available in Categories of Non-Compliance with Procedures (TR387).

3. If the auditor observes practice that would affect the validity of the test, then they must take immediate action. If the issue can be rectified on the day, then that should always be the aim, to minimise

the inconvenience to the farmer. However the auditor cannot witness unacceptable practice and allow it to continue. Consideration may need to be given to requiring re-testing of unsatisfactorily tested animals and whether payment for the test should be withheld.

4. All cases will be passed to AHVLA VLs, to assess any sanctions proposed, to help provide consistency of decision making and action.

Specific Action Required if Findings are Not Satisfactory or Not Acceptable [top](#)

1. With reference to the Assessment Guide (TR314) and TB testing instructions on the AHVLA Operations Manual or OV Instructions, if the auditing officer considers that procedures in any of the assessed areas are 'Not Satisfactory' or 'Not Acceptable', they must:

- consider whether the test has to be halted immediately and/or declared invalid if correction at the time is not feasible and the validity of the test is called into question
- discuss the relevant procedures with the OV (and farmer if required) at the time of the test, including whether re-testing of any animals will be required
- take corrective action at the time if possible, e.g. putting animals back through the crush where ear tags have not been read and recorded or where only visual inspection has taken place
- discuss the findings with the VL as soon as possible following the audit and agree on the appropriate further action.

Assessment of Paperwork/Sam Submissions [top](#)

1. Assessment of AHVLA paperwork, use of Sam and/or follow-on actions by OVs after the test will form part of the audit. Checks will be carried out in accordance with the existing Operations Manual instructions.

Record Keeping [top](#)

1. AHVLA will maintain a record of audits completed (TR386) containing the following information:

- date of audit
- herd owners name

- CPH
- name of OV
- practice name
- auditors name
- date of Day One (TT1) and Day Two (TT2)
- arrival time
- departure time
- non compliances:
 - minor (Y/N)
 - major (Y/N).