



# Anatomical Donation Program and Anatomical Materials

<b>Responsible Officer:</b>	Executive Vice President
<b>Responsible Office:</b>	University of California Health
<b>Issuance Date:</b>	09/28/2020
<b>Effective Date:</b>	09/28/2020
<b>Scope:</b>	The goal of the University is to ensure that Anatomical Materials are effectively managed and that the anatomical donation programs maintain public confidence in meeting the needs of donors and their families and advancing the health sciences education and research enterprise. Achieving the goal is the responsibility of the program staff, medical school deans and their designated Responsible Executive Officers (REOs), vice chancellors for research and the Office of the President.

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## I. POLICY SUMMARY

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The University of California (UC) is committed to maintaining a standard of excellence in managing and operating anatomical donation programs based at UC medical school campuses and with regard to the acquisition, use and disposition of Anatomical Materials used for education and research at all UC campuses. The UC Anatomical Donation Programs (ADP), also referred to as willed or donated body programs (hereafter referred to as “Programs”), provide a valuable public service by enabling people to donate their bodies to the UC. This policy applies to Anatomical Materials (as defined in this policy) donated to UC for use in education and research activities, as well as those acquired by UC from an Approved Alternate Source for these purposes.<sup>1</sup> All Anatomical Materials are used to support the education and training of health professionals and to further scientific and research endeavors. UC complies with all laws, regulations and requirements that are applicable to the management and operation of these programs and all Anatomical Materials used for education and research.

To meet this standard, UC maintains governance and oversight structures that ensure clear reporting lines and dual reporting mechanisms on campus and at the UC Office of the President (UCOP). Management initiatives and best practices for donation programs are regularly reviewed, and systemwide guidelines addressing major elements of these programs are in place. Key features include:

- Standard definitions for anatomical specimens for use in the acquisition, allocation, tracking and disposition of materials;
- The establishment of campus advisory boards to ensure compliance with anatomical donation program policies and guidelines;
- Information systems, at both the campus and UCOP levels, that permit tracking of Anatomical Materials from the time of donation or acquisition to the time of final disposition or return;
- Written guidelines for records management and standards for audit, security, staffing and personnel; and
- Systemwide donor forms, developed by the Division of UC Health and the Office of General Counsel, for use by ADPs to ensure compliance with legal requirements as well as standard tracking forms, developed by UCOP for use by all campuses to maintain consistency and proper chain of custody.

The goal of the University is to ensure that Anatomical Materials are effectively managed and that the ADPs maintain public confidence in meeting the needs of donors and their families and advancing the health sciences education and research enterprise.

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<sup>1</sup> This policy does not apply to human remains that are covered by federal Native American Graves Protection and Repatriation Act and its accompanying regulations, or the California Native American Graves Protection and Repatriation Act. This policy also does not apply to anatomical specimens obtained from patients of UC hospitals or clinics for purposes of diagnosis or treatment (such as during surgery or autopsy) and used and maintained by the University.

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Achieving this goal is the responsibility of the program staff, medical school deans and their designated REOs, vice chancellors for research and the Systemwide Executive Director of Anatomical Services within the University of California Health division at the UCOP.

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## **II. DEFINITIONS**

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**Acquired Specimens:** Human anatomical material typically sourced from an Approved Alternate Source for education or research use at a UC campus or by UC faculty, students, or researchers. Acquired Specimen designation may also be used to track human Anatomical Material without associated documentation, source or provenance, sometimes called legacy collections.

**Allocation:** The lending of Anatomical Materials from a UC Program to an approved end user.

**Anatomical Advisory Board (AAB):** An advisory board that provides broad input from the community by advising the campuses on policy and making recommendations regarding program activities.

**Anatomical Donation Program (ADP) also known as Anatomical Materials Program (AMP), Donated Body Program, Body Donation Program, Willed Body Program (Program(s)):** The Programs at the UC Schools of Medicine at Davis, Irvine, Los Angeles, San Diego and San Francisco that serve as the collection and preparation point for donated bodies and are the authorized custodians of Anatomical Materials.

**Anatomical Materials** also known as **Anatomical Specimens:** Human body parts donated to UC by an authorizing human adult or minor<sup>2</sup> (for use in education and research) that are grossly identifiable and commonly recognizable as such to a layperson without the use of any specialized methods of identification. This definition does not include blood, urine, feces, semen, or other bodily fluids, non-organic tissue types, tissue samples, human cells, hair, nails, teeth, paraffin blocks, or tissue slides.

**Anatomical Materials Review Committee (AMRC):** A campus management team at UC campuses with an ADP, which has the operational expertise to direct the Program.

~~**Anatomical Services:** The goods and services side of an anatomical donation program. The provision of Anatomical Materials and staff expertise or services for education and research purposes.~~

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<sup>2</sup> In general, donors are defined as those individuals who are 18 and older and who donate their whole body via a document of gift. In some circumstances, an emancipated minor or legally authorized representative may make an anatomical gift.

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**Approved Alternate Sources:** Resources for Anatomical Materials approved by the SAMRC that may include non-UC anatomical donation programs; organ procurement organizations; licensed or unlicensed tissue banks; UC or non-UC departments of pathology, surgery or others; ~~Bio-repositories~~Biorepositories; medical examiners or coroners' offices. Approved alternate sources must comply with all applicable laws, national best practices and published standards for non-transplant anatomical donations.

**Cremated Remains** also known as **Cremains:** The ashes and bone fragments of a human body that are left after cremation or alkaline hydrolysis and may include ashes from the cremation container. May also include foreign materials, pacemakers, or remnants of prosthetic devices.

**Digital Donor Library (DDL)** also known as **Anatomical Materials Registry:** A secure, electronic application and database, accessible to UC Programs, auditors and UCOP, to ensure that active, real-time, transparent controls of Programs are in place and that standard elements are gathered from each Program. The DDL is a donor registry used to manage and track all stages of donation from registration to final disposition.

**Donor Agreement** also known as **Donation Agreement, Document of Gift:** The legal document used by all UC Programs to register a donor or accept the donation of a human body for scientific use.

**Donor Registry:** A database that contains records of anatomical gifts and amendments to or revocations of anatomical gifts. All electronic and hard copy records regarding anatomical gifts to a UC Program are a part of the donor registry.

**Durable Power of Attorney:** An agent under a power of attorney for health care who has the right and duty of disposition under the California Probate Code Division 4.7 (commencing with Section 4600).

**End User:** An approved educator or researcher who requests and receives a loan of Anatomical Materials from a UC Program.

~~**Environmental Health & Safety (EH&S): A UC office that supports the mission of the University by providing comprehensive environmental protection, occupational health, and industrial safety expertise to the entire University community. Each UC campus has an EH&S office.**~~

**External User:** An entity (educational, medical, or other) that is not owned, operated by, or affiliated with UC that has been approved as an end user in accordance with University policies.

~~**Facility:** A location for storage and or use of Anatomical Materials.~~

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**Final Disposition:** For the purposes of the Programs, this includes both the method of disposition, currently cremation or another legal method, and the scattering of the cremated remains.

**Indirect Costs** also known as **Overhead:** Those expenses incurred by an operating unit/UC Program that are not directly associated with providing a good or service (e.g., rent, telephone, or chemicals).

**Inter-Campus Transfer (ICT):** The loan of anatomical material between UC Programs for use by ~~UC faculty, students or researchers only~~AMRC approved End Users.

**Intermediary** also known as **Third Party, Broker:** A person or company who acquires and distributes Anatomical Materials that were not donated directly to that person/company. This definition is not intended to apply to institutions that share research bio-specimens under formal academic/research collaborations.

**Internal User:** An entity (educational, medical, or other) that is owned, operated by, or affiliated with UC that has been approved as an end user in accordance with UC policies.

**Master Specimen Code** also known as **Code, Identification Number:** A unique alphanumeric code assigned to Anatomical Materials and linked to a donor or acquired specimen, from which the complete history of the materials can be tracked.

**Master Specimen List (MSL):** A list of anatomical material specimens, classified by region and used to define and track items through to final disposition.

~~Reports also known as Standardized Reports: A report that includes a set of criteria determined by the SAMRC.~~

**Responsible Executive Officer (REO):** Provides management oversight of the respective ADP, and is responsible for the accountability of all administrative and operational responsibilities, including campus director evaluations. A senior member of the SOM leadership team who reports to and is accountable to the medical school dean and serves as chair of the AMRC.

**Site Visit:** A physical inspection of an end user's facility performed by UC ~~campus and UCOP~~ ADP staff ~~and the Systemwide Executive Director~~ against a defined set of criteria.

**Standard Forms:** Program-specific forms standardized for systemwide use and approved by the Systemwide Executive Director with guidance by the SAMRC and Office of General Counsel. Forms may be required (e.g. Donation Agreement, Tracking Forms) or optional (e.g. Letter of Appreciation).

**Systemwide Anatomical Materials Review Committee (SAMRC):** The committee that recommends guidelines, policies, and procedures for adoption by all UC Programs,

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and serves in an advisory capacity to the Executive Vice President of UC Health or their designee.

**Systemwide Executive Director:** A UCOP manager with designated responsibility for the coordination and oversight of ADPs and who serves in an advisory capacity for all UC campuses with a need to procure Anatomical Materials for education and research purposes. The Systemwide Executive Director leads the Anatomical Donation Program office at UCOP.

**Teaching Collection:** Bones, fixed prosections or plastinated specimens allocated to a specific educator at a UC Campus for anatomical education (i.e., without further dissection or use in research), inventoried annually by the AMP, but allocated without a specific end point for return.

**Third-Party Donation:** A donation made when a donation agreement is completed by a Durable Power of Attorney, Spouse or Registered Domestic Partner. Other authorized agents may make this type of donation, by AMRC approval and with the use of the UC Standard Form designated for this purpose.

**Tracking Form:** A required Standard Form that documents the chain of custody between a Program and an end user, vendor or third party service provider.

**Uniform Anatomical Gift Act (UAGA):** An act established in 1968 to standardize state laws on the donation of organs and tissues for transplant, education and research. The 2006 UAGA update was implemented, with modifications, in California in 2008.

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### III. POLICY TEXT

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The UC relies on the support and generosity of the public for help in fulfilling its academic, research and healthcare mission. Each year, more than one thousand Californians make an extraordinary gift to the UC by donating their bodies or those of a loved one to support the education of health professionals and to further scientific research. The UC recognizes the value and importance of these donations and is committed to ensuring that they are stored, used, and disposed of with care and respect.

Human remains are integral to a wide range of educational, research, and clinical pursuits, including gross anatomy instruction, anatomical and physiological research, pathological examination, organ transplantation, skin grafts, stem cell research and reproductive therapy. Remains are received by the UC Programs through donation, or may be acquired, as needed, from Approved Alternate Sources for use in study, training and research. These Anatomical Materials (which are also referred to as willed or donated bodies, cadavers, or human or anatomical specimens) are also used for surgical procedural training, basic and applied biological and biomedical studies, allied

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health education, forensic research and training, mortuary science education, and the development and testing of new medical devices.

Anatomical Materials subject to this Policy are defined as those that are received by UC ADPs or acquired by UC from an Approved Alternate Source for education and research purposes.

- This Policy applies to Anatomical Materials donated to or acquired by the University for use in research and education endeavors. This policy does not apply to Anatomical Materials donated for the purpose of patient care activities such as transplantation or clinical therapy.
- The Programs at the Schools of Medicine at Davis, Irvine, Los Angeles, San Diego and San Francisco are the sole authorized custodians of the Anatomical Materials described in this Policy and support the needs of all UC locations, including the UC Riverside School of Medicine.
- Anatomical Materials used to support UC teaching and research activities at any UC location may only be obtained from or in coordination with one of the ADPs.
- Facilities that accommodate uses of Anatomical Materials must be laboratories or EH&S approved venues and ~~be in compliance with~~<sup>follow</sup> all federal, state, local and UC rules and regulations governing biological and chemical laboratory requirements in addition to public health and safety provisions.
- ~~ADPs are required to distribute a human anatomical specimen educational training to all approved End Users. Approval by the campus AAB or the SAMRC is required. Educational training is available to all for clinicians, faculty and staff that while participating in research and education or training activities where Anatomical Materials from any source are used. This ensures that applicable University policies and procedures about the acquisition and management of human anatomical specimens are widely distributed, including those administered by the Office of Contracts and Grants, Continuing Medical Education, Conflict of Interest Committees, the AMPs or others, are followed by participants and vendors.~~

**-Use of Human Anatomical Material**

Five of the University's six Schools of Medicine, specifically, those at Davis, Irvine, Los Angeles, San Diego and San Francisco have established a Program to serve as the collection and preparation point for donated bodies and may provide services for Anatomical Materials acquired from an Approved Alternate Source. These Anatomical Materials may be studied immediately as fresh tissue, or may be preserved for use at a later date by means of freezing, or as specially preserved tissue for use in anatomical preparations, including dissections. Skeletal remains are also prepared and used for educational and research purposes. For purposes of this Policy and the medical education and research activities at Riverside, the University's sixth school of medicine, Anatomical Materials will ~~continue to~~ be procured through the existing five Program(s).

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The University supports appropriate use of Anatomical Materials by faculty, students, and residents in training at University health sciences schools, by researchers on the campus, by qualified non-UC researchers (both in the non-profit and commercial sectors), by affiliated educational institutions such as the California State Universities and Community Colleges, and by certified continuing medical education programs. Specimen allocation by each ADP will follow the hierarchy outlined below:

1. UC students and researchers enrolled at or working for the campus at which a Program is based
2. UC students and researchers at other UC campuses
- 2.3. California educational partners (California State Universities and California Community Colleges)
- 3.4. External non-commercial research and education organizations
- 4.5. Commercial research programs and commercially ~~sponsored~~ educational programs ~~also known as External Users~~

The teaching and research needs of UC campuses are given priority over External User requests for Anatomical Materials. To ensure that the needs of UC faculty and students are met, and to minimize the need for acquisition of materials from outside the UC system, the University encourages sharing and transfer of anatomical material between ADPs.

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## **IV. COMPLIANCE / RESPONSIBILITIES**

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The University has established a defined reporting structure for responsible oversight of the Programs (Appendix I). The structure involves dual local/systemwide reporting lines to reflect the important roles of each campus and the UCOP in ensuring the proper management of the Program.

### **University of California Health at UCOP**

#### ***Systemwide Anatomical Materials Review Committee (SAMRC)***

- SAMRC serves in an advisory capacity to the Executive Vice President (EVP) of UC Health or their designee. SAMRC membership includes a senior manager designated by the UC Health EVP, the Systemwide Executive Director, and campus participants representing the campus Anatomic Materials Review Committee (AMRC) including the REO, the ADP Director, and the faculty Advisor from each of the five medical schools authorized to operate programs under this Policy. The UC Riverside SOM Dean or their designee is also a member. Other members may be appointed to the SAMRC by the EVP or included as subject matter experts, such as those from the Office of General Counsel; Ethics, Compliance and Audit Services; and ~~;~~ Risk Services.
- SAMRC recommends guidelines, policies and procedures for adoption by all UC Programs.

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- SAMRC must meet at least three times per year.

***Systemwide Executive Director ~~of Anatomical Services~~***

- The Systemwide Executive Director reports to the Executive Vice President of UC Health or to a senior manager designated by the EVP for this function.
- The Systemwide Executive Director convenes the SAMRC and serves in an advisory capacity for all UC campuses with a need to procure Anatomical Materials for education and research purposes.
- The Systemwide Executive Director provides oversight and manages coordination of the ADP locations and the ADP office at UC Health.
- The responsibilities of the Systemwide Executive Director, with input from the SAMRC, include initiating policy and procedure development, developing inventory audit and monitoring procedures, verifying and reporting compliance with policies and procedures, and managing the development, coordinating the development and implementation of ethical standards of conduct, and guidelines and trainings for the management of ADPs. The Systemwide Executive Director will be directly involved in the recruitment, selection and evaluation of ADP Directors.
- On a periodic basis, the Systemwide Executive Director receives and manages reviews of campus and Program rReports regarding all donations, procurements, inventories, requests, transfers and allocations, returns of material, and final dispositions. The Systemwide Executive Director or their designee conducts regular reviews, site visits, inventory confirmations and conferences.

To ensure that all ADPs conform to UC policies and procedures and meet ethical standards, each Program Director is accountable to the Systemwide Executive Director for with regard to their overall performance and compliance with Systemwide policies and standards. Simultaneously the Program Director is accountable to the REO for all administrative and operational responsibilities. This represents the dual local/systemwide reporting structure of each UC Program. The REO, with input from the faculty Advisor, is responsible for annual (and other periodic) evaluations of the Program Director, and receives and considers formal input from the Systemwide Executive Director as a regular part of the employee evaluation process. The UC Health EVP or their designee may also consider formal input from the REO's as a part of the evaluation process for the Systemwide Executive Director.

***UC Schools of Medicine***

- The five medical schools authorized to operate Programs (Davis, Irvine, Los Angeles, San Diego and San Francisco) and the medical school at UC Riverside will participate in systemwide activities and be subject to systemwide policies applicable to all ADPs. The ADP campuses will have a direct link and systemwide accountability to the UCOP through the Systemwide Executive Director and the ADP office in the University of California Health division of the UCOP.

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- The School of Medicine Dean, or designated senior member of the Dean's office, serves as the REO providing management oversight of the Program.
- Locally, the Program will have a campus Director who must be responsible for the daily operation of the Program and reports to the REO.
- Each ADP will have an appointed faculty Advisor who will be afforded sufficient time to provide meaningful participation in Program operations. The faculty Advisor provides active operational advice and participates in the hiring and evaluation of Program employees.
- Each Program operates under the direction of an Anatomical Materials Review Committee (AMRC), a management team with operational expertise, that consists of at least the REO, who will serve as chair, the campus Director, and the faculty Advisor (a senior faculty member with expertise in the use of Anatomical Materials). The Dean may appoint additional members with relevant qualifications to this committee as desired.
- The AMRC meets monthly, or a minimum of ten times per year, to ensure proper operation of the Program. Designated members of this committee review and recommend action on requests for use of anatomical material as necessary.
- Each ADP campus establishes an AAB consisting of the REO, faculty, staff, users of Anatomical Materials, the university community and the public. This board provides broad input by advising the campus on policy and making recommendations regarding program activities. The medical school dean serves as chair of the AAB and convenes the board. The AAB meets at least annually or as necessary.
- ADPs are required to distribute a human anatomical specimen educational training to all approved End Users.

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## **V. PROCEDURES**

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### **Acquisition and Management of Donated Materials**

Each ADP is required to comply with approved standardized donor agreement requirements that are developed in accordance with the UAGA. UC ADPs must not accept unclaimed human remains for use in education and research (as permitted by HSC Chapter 4, Section 7200-7208). Each Program must use an approved authorization/document of gift form and other Standardized Forms. Any local variation in forms to reflect unique program features must be approved in consultation with the SAMRC, legal counsel, and the Systemwide Executive Director. Consistent with the UAGA:

- An individual may prearrange for the donation during their lifetime of their remains to the Program.
- A spouse, registered domestic partner, or other individual may initiate the donation of anatomical remains on behalf of the deceased as permitted by the UAGA, or under an acceptable and unambiguous durable power of attorney for

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health care that expressly permits the person to make an anatomical gift on behalf of an individual~~the deceased~~.

- As determined by the local campus, and with approval of the Systemwide Executive Director, third party donations may also be accepted upon completion of required documentation. UC ADPs do not accept donations from individuals identified in Health and Safety Code Section 7100 (a)(7)-(9), which specifically include:
  - A conservator of the person appointed under Part 3 (commencing with Section 1800) of Division 4 of the Probate Code when the decedent has sufficient assets.
  - A conservator of the estate appointed under Part 3 (commencing with Section 1800) of Division 4 of the Probate Code when the decedent has sufficient assets.
  - The public administrator when the deceased has sufficient assets.

All donors must waive the right set forth in California Health and Safety Code 7151.40 for the return of cremated remains, unless otherwise mandated by court order.

The University must maintain a centralized registry – the Digital Donor Library (DDL) – using a secure electronic system accessible by Program staff at each campus and by UCOP, to ensure active, real-time, transparent control of the Programs. The DDL will be managed by the Systemwide Executive Director and the ADP office to ensure that standardized definitions are in place, and that standard data elements are gathered from each Program. Each campus ensures that the Program has secure computing environments and access to systemwide databases.

The DDL will manage and track all aspects of donation, including anatomical preparation, handling, inventory management, allocation, and disposal of Anatomical Materials and may be used to track Anatomical Materials acquired from an Approved Alternate Source. A system to relay all death notifications from each campus to the Systemwide Executive Director will be used. This notification is accomplished via a call service as well as through access to the DDL.

Ceremonies of appreciation may be held annually at each campus and may include donor families at the discretion of the ADP Director and AMRC.

### **Anatomical Materials Preparation, Handling, Inventory Management and Tracking**

As permitted under the UAGA, in order to determine the medical suitability of the Anatomical Material donated for research and education, all Anatomical Material donated to a UC program must be tested for communicable diseases including but not limited to HIV, Hepatitis B and Hepatitis C and results must be recorded in the DDL. As applicable, other tests may be required or guidance issued, such as the Guidance for safe practices in UC Anatomical Donation Programs in the context of COVID-19. In general, Anatomical Materials that test positive for communicable diseases are not

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acceptable for use at the UC and must not be allocated to any entity. Entities wishing to utilize untested or positive material(s) must be approved in advance by the AMRC and they must indemnify the UC, in writing, for all associated risks.

| **In order to To** manage the UC's collection of human anatomical material more efficiently, Anatomical Materials must be defined in a Master Specimen List (MSL) (Appendix II).

- The MSL has a common set of definitions and must be reflected in a standard UC coding system.
- Standardized specimen tagging and tracking by means of a suitable technology must be developed by the SAMRC and utilized by the local campus.
- The tagging system must be integrated with the DDL, which permits data management from the preparation laboratory to UCOP.
- Complete inventories must be validated on a monthly basis.
- ADPs must establish a schedule for physical inventory of their collections to occur no less than annually. Discrepancies indicate the need for more frequent inventories. Upon request of the Systemwide Executive Director, inventories may be conducted at random or for cause.
- Campus audit services conduct~~s~~ unscheduled inventory and financial audits of local Programs. Audits may be initiated by the Systemwide Executive Director.

### **Anatomical Material Request and Fulfillment**

Anatomical Materials necessary to support UC teaching and research activities at any UC location may only be obtained from or in coordination with one of the ADPs.

Anatomical Materials that are not available through the Programs may be obtained from an Approved Alternate Source and requested via formal application to the campus committee designated with oversight responsibilities.

Each ADP will adhere to the following principles when making decisions about allocations of donated anatomical material:

- The Program must ensure that all requests for use of donated Anatomical Materials identify the prospective custodian of the material and the intended users, and contain an appropriately detailed description of the proposed use, the research protocol (if applicable), the teaching or training application, and the expected duration of the use.
- Allocation decisions must be made by the campus AMRC with general guidance on allocation policy from its AAB.
- The acquisition of anatomical specimens from third-party brokers or intermediaries is prohibited. Anatomical Materials donated to UC may not be assigned to third- party brokers or intermediaries. All Anatomical Materials

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donated to the University may only be transferred directly from UC as the provider to an approved End U-user for purposes of teaching or research.

- All end-users that request and receive Anatomical Materials must have an appropriate use facility such as a laboratory or other scientific venue that has received approval by the respective ADP, and must undergo routine inspection by the local Program Director or their designee. The Systemwide Executive Director or their designee may also inspect facilities.
- Data on all users for all purposes must be collected and included in the DDL.
- An individual or program approved for a loan of Anatomical Materials must certify agreement to the terms and conditions of the allocation, including the duration of use and conditions for return to the Program.
- ADPs may maintain permanent teaching collections, such as skeletal or plastinated collections whose loan duration may be considered indefinite.

### **Anatomical Material Return and Disposition**

- All Anatomical Materials must be returned to the Program to which they were originally donated. In exceptional circumstances, the AMRC may approve alternate disposition arrangements upon verification of records pertaining to the subject materials.
- Each ADP must verify and record the return and final disposition of materials within the DDL and the Systemwide Executive Director ADP office at UCOP must be provided access to this information.
- The UC will provide for the appropriate disposition of Anatomical Materials through cremation or alkaline hydrolysis and scattering at sea, or by other legal methods of disposition in accordance with the UAGA and other applicable provisions of the California Health and Safety Code and applicable regulations and guidance published by the California Department of Public Health.
- Some materials that are not Anatomical Materials are not individually catalogued by ADPs; these could include blood, urine, feces, semen, or other bodily fluids, non-organic tissue, tissue samples, human cells, hair, nails, and teeth, and specimens preserved in paraffin blocks or as tissue slides. In general, these materials are included in California Health and Safety Code 117690 and are handled and disposed of in accordance with California Health and Safety Code Sections 117600 through 118360.

### **Financial Management**

To the extent practical, the University funds the administration of the ADPs by assessing costs to all users of Anatomical Materials, internal and external, educational and commercial.

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- A ~~preparation~~ fee for ~~services~~assigned materials will be assessed by each ADP. The amount of this fee will be determined based on a master ~~loan~~ fee description and fee application standards, developed by the SAMRC. The master ~~loan~~ fee description will be relevant to actual program costs in accordance with UC policies and procedures.
- Other fees for use of Anatomical Materials, supplies or labor must comply with University policies (e.g., recovery of indirect costs).

### **Physical Security**

All Programs and campus facilities that store or use Anatomical Materials must provide physical security at a level that will permit access only by authorized personnel approved by the AMRC or AAB to ensure that donations and Anatomical Materials are protected from misuse. The combination of security methods employed must result in the ability to track and monitor individualized access.

- Physical security mechanisms must employ individualized coded entry access.
- Program security systems may include alarm systems, card-key access, and video cameras as determined by local facility configurations.

### **Program Staffing**

- All non-represented Program employees are subject to UC personnel policies, including those on hiring and periodic performance evaluation. The hiring process must include financial and criminal background checks, in accordance with applicable personnel policies and California law.
- Job descriptions must designate positions assigned to ADPs as critical positions.
- UC must establish standardized job descriptions and classifications for ADP Directors and key staff. Pay scales must be regularly reviewed by the SAMRC and reviewed and approved by Human Resources to conform pay rates to the level of responsibility required for management of the Program. All employees must have confirmation of a completed background check on file.
- Each campus ADP Director must be classified at a level that reflects the responsibilities and duties of the position.

### **Physical Plant**

Programs must be assigned space sufficient to permit appropriate storage of Anatomical Materials and work areas that allow faculty, staff and students to operate in a safe and secure environment. Program work areas will include areas appropriate for anatomical preparation, for dissection and for storage of frozen and embalmed tissues as well as intact remains.

## Violations

Suspected violations of this Policy must be reported to the Campus Compliance/Whistleblower Hotline, the campus Research Compliance Officer, or the Health System Compliance Office for investigation. Other reporting resources may include the Staff Affirmative Action Office or reporting through the grievance procedure.

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## VI. RELATED INFORMATION

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For information or forms, contact the [Anatomical Donation Program Office, Systemwide Executive Director of Anatomical Services](#)—University of California Health at UCOP.

For information on securing data (Institutional Information) and information systems (IT Resources) see [Business and Finance Bulletin IS-3 Electronic Information Security](#).

For information on background checks see [Personnel Policies for Staff Members 21](#).

[Uniform Anatomical Gift Act, California Health & Safety Code §§ 7150 et. seq.](#)

[UC Health Mission Vision & Values](#).

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## VII. FREQUENTLY ASKED QUESTIONS

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Not applicable.

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## VIII. REVISION HISTORY

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[2025: Technical revisions:](#)

- [updated UC Health responsibilities to include new UCOP ADP staff](#)
- [expanded definition of acquired specimens to include unassociated anatomical materials, clarified definition on intercampus transfers & removed unnecessary definitions](#)
- [updated terminology in Financial Management section](#)
- [specified California public education partners in allocation hierarchy](#)
- [clarified UC policy on use of unclaimed remains and third-party donations](#)
- [clarified ADP responsibilities for training approved users of Anatomical Materials](#)
- [updated Appendix VI with link to UAGA & added link to UC Health Mission, Vision & Values.](#)

[August 24, 2020: Technical revisions:](#)

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- updated pronouns and titles
- updated and clarified membership including adding UCR SOM
- clarified scope of policy over several sections
- reconciled definitions
- corrected typos
- included appropriate use facility
- referenced Guidance for safe practices of UC Anatomical Donation Programs in the context of COVID-19
- added references to the UAGA and California Health & Safety Code
- updated Appendices I & II

**September 1, 2017:** Minor technical revisions and this Policy was remediated to meet

Web Content Accessibility Guidelines (WCAG) 2.0. Minor technical edits are:

- updated the title of the Responsible Office/Officer
- added capitals and acronyms for consistency and correcting a spelling error
- changed the term “infected” to “test positive”
- corrected date of Uniform Anatomical Gift modification and updated current citation

**2012:** Revision UC-HS-12-0169 began. **2005:** PP 110305 est.

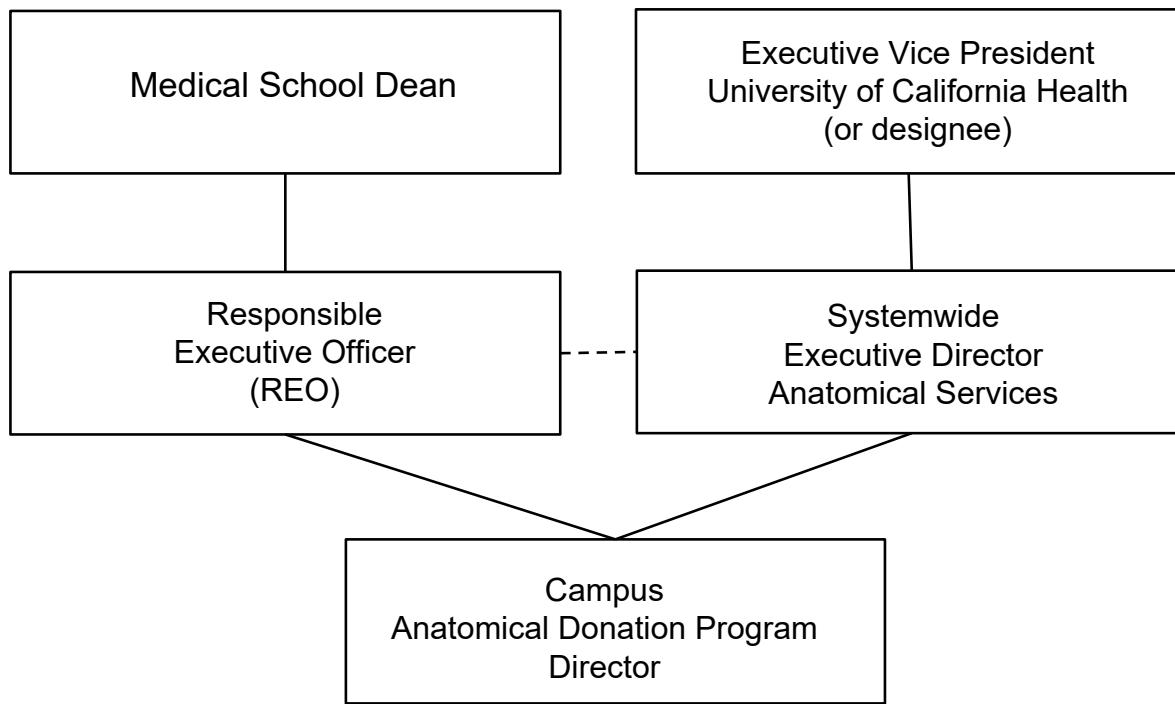
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## **IX. APPENDIX**

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### **Appendix I: Dual Reporting Structure**

## Dual Reporting Structure



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**Appendix II: Master Specimen List (MSL)**

**Whole Cadaver**

Whole Un-embalmed Cadaver (WC-UN)  
Whole Embalmed Cadaver (WC-EM)  
Whole Un-embalmed Cadaver - Brain removed (WC-UNBR)  
Whole Embalmed Cadaver - Brain removed (WC-EMBR)  
Whole Skeleton (WC- SKEL)  
Disposable Material (WC-DMAT) (Specify)

**Cephalus**

Whole Cephalus (C-HD)  
R Hemi-sected Head (C-RHH)  
L Hemi-sected Head (C-LHH)  
Cephalus w/ Cervical Spine (C-CS)  
Cephalus with Cervical-Thoracic Spine (C-CTS)  
Occiput - C Spine (C-OC)  
Skull (C-BS)  
R Temporal (C-BTR)  
L Temporal (C-BTL)  
Calvaria (C-BC)  
Mandible (C-BMR)  
Maxilla (C-BML)  
Whole Brain (C-WB)  
R Half Brain (C-HBR)  
L Half Brain (C-HBL)  
Cephalus Tissue (C-T) (specify)  
Disposable Material (C-DMAT) (Specify)

**Torso**

Whole Torso (T-W)  
Whole Torso with Limbs (T-WL)  
Torso with Shoulders (T-WSH)  
Torso with Cephalus (T-WHD)  
Torso with Cephalus and Shoulders (T-HDSH)  
Torso with Cephalus and Whole Upper Limbs (T-HDWUL)  
Torso with Upper Limbs (T-UL)  
Torso with Lower Limbs (T-LL)  
Torso with knees (T-LLK)  
Thorax (T-TRX)  
Cephalus, Thorax and Shoulders (T-CTSH)  
Cephalus, Thorax and Upper Limbs (T-CTUL)  
Whole Spine (T-SW)

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Cervical Spine (T-SCV)  
Thoracic Spine (T-STH)  
Cervical-Thoracic Spine (T-SCT)  
Cervical-Thoracic-Lumbar Spine (T-SCTL)  
Thoracic Lumbar Spine (T-STL)  
Thoracic- Lumbar-Sacral Spine (T-STLS)  
Lumbar Spine (T-SLU)  
Lumbo-sacral spine (T-SLS)  
Sacral Spine (T-SS)  
Spinal cord (T-SCD)  
Abdomino-pelvis (T-ABD)  
Pelvis (T-PW)  
R Hemi Pelvis (T-PHR)  
L Hemi Pelvis (T-PHL)  
Pelvis with Lumbar Spine (T-PLS)  
Pelvis with Lower Limbs (T-PLL)  
Pelvis with LL at mid tibia (T-PLLMT)  
Pelvis with LL at mid femur (T-PLLMF)  
Organ (individual or Paired) (T-ORG) (specify)  
Tissue (T-T) (specify)  
Disposable Material (T-DMAT) (Specify)

**Upper Limb**

R Upper limb with Shoulder (UL-WR)  
L Upper limb with Shoulder (UL-WL)  
R Shoulder (UL-SR)  
L Shoulder (UL-SL)  
R with Full Humerus (UL-HRF)  
L with Full Humerus (UL-HLF)  
R at Mid Humerus (UL-MR)  
L at Mid Humerus (UL-ML)  
R Elbow (UL-ER)  
L Elbow (UL-EL)  
R Forearm (UL-FR)  
L Forearm (UL-FL)  
R Hand (UL-HR)  
L Hand (UL-HL)  
R Humerus (UL-BHR)  
L Humerus (UL-BHL)  
R Radius (UL-BRR)  
L Radius (UL-BRL)  
L Ulna (UL-BUR)  
L Ulna (UL-BUL)  
Upper Limb Tissue (UL-T) (specify)  
Disposable Material (UL-DMAT) (Specify)

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**Lower Limb**

R Lower with Hemi Pelvis (LL-HPR)  
L Lower with Hemi Pelvis (LL-HPL)  
R Lower with Full Femur (LL-WR)  
L Lower with Full Femur (LL-WL)  
R Lower at Mid Femur (LL-MR)  
L Lower at Mid Femur (LL-ML)  
R Lower at Tibia (LL-TFR)  
L Lower at Tibia (LL-TFL)  
R Knee (LL-KR)  
L Knee (LL-KL)  
R Foot (LL-FR)  
L Foot (LL-FL)  
R Femur (LL-BFMR)  
L Femur (LL-BFML)  
R Tibia (LL-BTR)  
L Tibia (LL-BTL)  
R Fibula (LL-BFR)  
L Fibula (LL-BFL)  
Tissue (LL-T) (specify)  
Disposable Material (LL-DMAT) (Specify)

**Other**

Other Partial Remains (O-PR) (Specify)

MSL Last update 02162018