



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare
6700B Rockledge Drive, Suite 2500, MSC 6910
Bethesda, Maryland 20892-6910
Home Page: <http://grants.nih.gov/grants/olaw/olaw.htm>

FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare
6700B Rockledge Drive, Suite 2500
Bethesda, Maryland 20817
Telephone: (301) 496-7163
Facsimile: (301) 402-7065

August 15, 2019

Re: Animal Welfare Assurance
A4059-01 [OLAW Case P]

Ms. Heather Cosier
Associate Vice Provost for Research Compliance
Tufts University
136 Harrison Avenue
Boston, MA 02111

Dear Ms. Cosier

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your August 14, 2019 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Cummings School of Veterinary Medicine at Tufts University. According to the information provided, OLAW understands that a moribund rat was directed to be euthanized by the Attending Veterinarian (AV) but the laboratory technician failed to do so. The next day the technician weighed the rat, found it to have reached the established humane endpoint weight loss criteria, and euthanized it. Changing the treatment plan in this fashion caused the rat to experience unnecessary pain and distress.

The preventive actions consisted of notifying the Principal Investigator who counseled the technician to always follow the AV's directives. The laboratory staff was retrained on following AV instructions and on euthanizing animals that have reached the humane endpoint as described in the protocol.

Based on its assessment of this explanation, OLAW understands that measures have been implemented to correct and prevent recurrence of this problem. OLAW concurs with the actions taken by the institution to comply with the PHS Policy.

Sincerely,

(b) (6)

Axel Wolff, M.S., D.V.M.
Deputy Director
Office of Laboratory Animal Welfare

cc: IACUC Chair



Office of the Vice Provost for Research
Institutional Animal Care and Use Committee

August 14, 2019

Dr. Axel Wolff
Office of Laboratory Animal Welfare (OLAW)
National Institutes of Health
6700B Rockledge Drive, Suite 2500, MSC 6910
Bethesda, MD 20892

Dear Dr. Wolff:

We are writing to notify OLAW of the circumstances and actions taken with respect to the following issue of non-compliance, as required by the PHS Policy on Humane Care and Use of Laboratory Animals (section IV.F.3). The Cummings School of Veterinary Medicine at Tufts University (Grafton Campus) Assurance number is D16-00572 (A4059-01).

According to the approved IACUC protocol, the veterinarian would be consulted to advise on animals that show gross signs of distress (e.g. decreased grooming, hunched posture) and animals that had lost >15% of their original body weight would be euthanized. The Attending Veterinarian (AV) examined a rat which was severely depressed, dyspneic and moribund. After a discussion with the lab technician, the AV directed the lab technician to euthanize the rat. Before the lab technician euthanize the animal, she re-evaluated the animal and it appeared somewhat brighter, therefore she did not follow through with euthanasia, as directed by the AV. The next day, the lab technician weighed the rat, then euthanized it because the humane endpoint of >15% body weight loss had been reached.

The Principal Investigator was sent a letter of non-compliance regarding this incident since the lab technician changed the treatment plan without the AV's advance approval. This action caused the rat to experience pain and distress beyond the humane endpoints approved in the protocol.

The PI responded to the IACUC with the following action plan in order to prevent a recurrence. The PI met privately with the lab technician involved to discuss the importance of following the AV's directives, so that the pain and distress experienced by the animals is limited to the euthanasia criteria approved in the IACUC protocol. Also, a training session was held at a lab meeting with all lab personnel that included the AV. It was made clear that any diversion from an approved treatment plan requires agreement from the AV. For future studies on their protocol, it is now clear to the lab personnel that animals must be euthanized when they reach the humane endpoint and any decisions regarding animal health are the purview of the AV.

Since the rat experienced pain and distress beyond the endpoints in the IACUC protocol, the IACUC voted the issue to be considered "significant" at a convened meeting. This letter provides a summary of the issue and resolution to OLAW as voted by the IACUC. Internal funds covered this animal work. No grant funding was used.

If you have any questions, please contact us. Thank you.

Sincerely,

(b) (6)

Heather Gipson-Cosier, JD
Associate Vice Provost for Research Compliance
Tufts University

ADDRESS: 136 Harrison Ave, Boston, MA 02111

<http://viceprovost.tufts.edu/iacuc/>

Obtained by Rise for Animals. Uploaded 08/10/2020

Retrieved from Animal Research Laboratory Overview (ARLO)

Ward, Joan (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Wednesday, August 14, 2019 1:37 PM
To: (b) (6) OLAW Division of Compliance Oversight (NIH/OD)
Cc: Gipson-Cosier, Heather; (b) (6)
Subject: RE: Report of a Noncompliance

Thank you for this report (b) (6) Dr. Wolff will respond soon.

Regards,
Joan

From: (b) (6)
Sent: Wednesday, August 14, 2019 11:26 AM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Gipson-Cosier, Heather <Heather.Cosier@tufts.edu>; (b) (6)
Subject: Report of a Noncompliance

Hello,

Please find attached a report of noncompliance that the IACUC voted as significant.

Thank you,
(b) (6)