



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

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FOR EXPRESS MAIL:

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6705 Rockledge Drive
Bethesda, Maryland 20817
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August 7, 2018

Re: Animal Welfare Assurance
#A3471-01 [OLAW Case 3C]

Dr. Wesley Byerly
Associate Vice President
for Research Compliance
UConn Health
263 Farmington Avenue
Farmington, CT 06030

Dear Dr. Byerly,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your July 26, 2018 letter reporting the suspension of animal protocols at UConn Health. According to the information provided, OLAW understands that the Institutional Animal Care and Use Committee (IACUC) suspended two protocols due to individuals not completing required training and suspended three others because annual reviews had not been submitted. Due to current IACUC policies, the IACUC took these serious actions in response to administrative matters.

The corrective actions taken in response to the suspensions consisted of the individuals involved completing training and submitting the annual reviews, after which the IACUC lifted the suspensions. The IACUC has re-evaluated the use of suspensions and will no longer take this action for administrative reasons. The policies involving training and annual reviews have been amended accordingly.

Based on its assessment of this explanation, OLAW understands that measures have been implemented to correct the issues leading to the suspensions. OLAW concurs with the actions taken by the IACUC to comply with the PHS Policy on Humane Care and Use of Laboratory Animals and to use the suspension mechanism as outlined in PHS Policy IV.C.6.

Sincerely,

(b) (6)

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

cc: IACUC Chair

(b) (6)

UConn HEALTH

Dr. Brent Morse
Acting Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
6700B Rockledge Drive, Suite 2500, MSC 6910
Bethesda, MD 20892-6910

July 26, 2018

RE: PHS Assurance A3471-01/D16-00295, UConn Health

Dear Dr. Morse-

I am writing to you to provide a final report of protocol suspensions which occurred due to administrative reasons. Our IACUC policy on personnel training states that if individuals do not complete required training by a certain due date, protocols will be suspended by the IACUC. We have another IACUC policy that states if annual reviews are not submitted by a certain due date, those protocols will be suspended by the IACUC.

This is the first time in recent history that we have had to suspend protocols because of failure to complete required training and/or not submitting an annual review to the IACUC. Because our IACUC policies state that suspension is required, our IACUC felt that they had no option but to suspend the protocols. There were 2 protocols suspended because individuals did not complete required training and 3 protocols were suspended because annual reviews were not submitted. All suspensions were lifted by the IACUC when appropriate actions occurred (training completed and annual reviews submitted). None of the suspended protocols utilized USDA-regulated species and none were funded by federal funds – they were funded by private agencies and institutional funding sources (department funds and start-up funds). There were no animal welfare concerns.

We realize that these self-imposed suspensions are not appropriate actions for the IACUC to take; as this situation has not occurred prior to the June 2018 IACUC meeting, the IACUC did not fully realize the impact that suspensions would have. The IACUC met today to discuss different actions that could be used instead of suspensions, as these suspensions are not required by federal regulations; therefore, suspensions for administrative reasons will not occur again. Our IACUC policies regarding animal training and annual reviews have been changed to reflect these changes.

While all efforts were made to deal with this issue in a timely and meaningful manner, I realize there may be questions that arise following your review of this material. Please feel free to contact me at byerly@uchc.edu or at (b) (6)

Sincerely,

(b) (6)
Wesley G. Byerly, Pharm.D.

Associate Vice President, Research Integrity and Regulatory Compliance

Cc: Dr. Kathryn Bayne, AAALAC-i

Institutional Animal Care and Use Committee
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Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Friday, July 27, 2018 9:00 AM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Final report, UConn Health A3471-01/D16-00295

Thanks for this report, (b) (6) regarding what we had discussed. I spoke with Dr. Morse about this as well and we both agree that your IACUC is correct in deciding to use suspension only for serious infractions, not administrative matters. We will send you a response soon.

Axel Wolff

From: (b) (6)@uchc.edu]
Sent: Friday, July 27, 2018 8:06 AM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Subject: Final report, UConn Health A3471-01/D16-00295

Good morning-

Attached please find a final report from UConn Health. If you have any questions, please feel free to contact me.

Thank you and have a wonderful day.

(b) (6)

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