



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare
Rockledge One, Suite 360
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
Rockledge One, Suite 360
6700B Rockledge Drive, Suite 2500
Bethesda, Maryland 20817
Telephone: (301) 496-7163
Facsimile: (301) 402-7065

March 12, 2019

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

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 March 8, 2019 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at UConn Health. According to the information provided, OLAW understands that eight rats failed to receive the post-operative analgesia specified in the protocol because the Principal Investigator (PI) felt the animals were not in pain or distress.

The corrective action consisted of counselling the PI to follow the protocol as written or to submit an amendment to the Institutional Animal Care and Use Committee (IACUC) for review and approval.

Based on its assessment of this explanation, OLAW understands that measures have been implemented to prevent recurrence of this problem. OLAW concurs with the actions taken by the IACUC 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

(b) (6)

UConn HEALTH

Dr. Brent Morse
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
Rockledge One, Suite 360
6705 Rockledge Drive - MSC 7962
Bethesda, MD 20892-7982

March 8, 2019

RE: PHS Assurance D16-00295 (A3471-01) UConn Health

Dear Dr. Morse-

I am writing to you to provide a report of an incident of non-compliance at UConn Health.

On February 14, 2019, while performing post-approval monitoring, it was discovered that a PI was not using analgesia after a non-surgical procedure; the approved protocol stated that Buprenorphine would be given twice per day for two days after a procedure for placement of an orthodontic spring. 8 rats had this procedure performed without the analgesia being provided. When questioned, the PI and research staff indicated that the rats did not appear to be in any pain or distress after the procedure. They stated that this was a "cut-and-paste" error from a protocol in which a surgical procedure was performed which included the use of Buprenorphine. It was the PI's position that this non-surgical procedure did not require the use of analgesics.

The PI was informed that this was a reportable non-compliance to OLAW. The PI was informed that Buprenorphine must be given as described in the approved protocol. It was further discussed that if the PI wanted to discontinue the use of Buprenorphine, the protocol must be modified and the modified protocol must be approved by the IACUC before the use of Buprenorphine could be stopped. This incident was brought to the February IACUC meeting for discussion. There are no federal funds supporting this IACUC protocol.

While all efforts were made to deal with this matter 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 Affairs

cc: (b) (6)

Institutional Animal Care and Use Committee
263 FARMINGTON AVENUE, MC 1523
FARMINGTON, CT 06030-1523
PHONE 860.679.3429
FAX 860.679.1005
ooacc@uchc.edu
research.uchc.edu

An Equal Opportunity Employer

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Monday, March 11, 2019 7:01 AM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Report of non-compliance, PHS A3471-01 (D16-00295)

Thank you for this report, (b) (6) We will respond soon.

Axel Wolff, M.S., D.V.M.
Deputy Director, OLAW

From: (b) (6)
Sent: Friday, March 8, 2019 10:21 AM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Subject: Report of non-compliance, PHS A3471-01 (D16-00295)

Good morning.

I am attaching a report of non-compliance at our institution, UConn Health, PHS A3471-01 (D16-00295) for your review. If you need further information, please feel free to contact me.

Thank you and have a wonderful weekend.

(b) (6)

