



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare  
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6705 Rockledge Drive - MSC 7982  
Bethesda, Maryland 20892-7982  
Home Page: <http://grants.nih.gov/grants/olaw/olaw.htm>

FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare  
Rockledge One, Suite 360  
6705 Rockledge Drive  
Bethesda, Maryland 20817  
Telephone: (301) 496-7163  
Facsimile: (301) 402-7065

November 27, 2017

Re: Animal Welfare Assurance  
A3878-01 [OLAW Case A]

James Coleman, Ph.D.  
Provost and Executive Vice Chancellor  
For Academic Affairs  
University of Arkansas  
Room Administration Building  
Fayetteville, AR 72701

Dear Dr. Coleman,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your November 22, 2017 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of Arkansas, following up on an initial report on June 5, 2017. According to the information provided, OLAW understands that dogs and cats were used in an animal assisted therapy program although only horses had been approved for the activity by the Institutional Animal Care and Use Committee (IACUC).

The corrective actions consisted of stopping the unapproved activity, retraining the faculty member, ensuring that future animal activities are approved by the IACUC, and having the IACUC Coordinator and Attending Veterinarian review policies and procedures with the Animal Science Department.

Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate, correct, and prevent recurrence of the noncompliance. We appreciate having been informed about this matter and find no cause for further action by this Office.

Sincerely,

Signature

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

cc: IACUC Chair



# UNIVERSITY OF ARKANSAS

Office of the Provost and Executive Vice Chancellor for Academic Affairs

November 22, 2017

Re: Assurance Number A3878-01

Axel Wolff, D.V.M.  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health

Dear Dr. Wolf,

Pursuant to the requirements of the Animal Welfare Act, this letter serves as documentation regarding the final actions that pertain to the voluntary reporting of non-compliance at the University of Arkansas. Our original correspondence identifying the infraction was dated June 5, 2017.

To review, the Animal Science Department offered a source in Fall 2016 entitled *Equine Assisted Therapy*, during which the instructor chose to include therapy derived from dogs and cats without consultation of the IACUC. Upon learning of the use of dogs and cats in the activity, which violates our Assurance Statement, the faculty member was instructed to stop the activities, receive additional training on working with the IACUC, and agreed to modify future course offerings that will not conflict with campus practice.

Since the voluntary reporting of non-compliance and the initial response of the IACUC, one additional measure has been taken to safeguard against this type of mistake in the future. Specifically, our IACUC Coordinator, and Attending Veterinarian met with the Animal Science Department to review policies and procedures in August 2017.

If you require any additional information, do not hesitate to contact either myself, or our Interim Director of Compliance. Secondary Individual at Phone Number

Regards,

Signature

James Coleman, Ph.D.  
Provost and Executive Vice Chancellor  
For Academic Affairs

Wolff, Axel (NIH/OD) [E]

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**From:** Wolff, Axel (NIH/OD) [E]  
**Sent:** Monday, November 27, 2017 9:52 AM  
**To:** Secondary Individual  
**Subject:** RE: OLAW report - AR

Thank you, Secondary Individual. I'll send a response soon.  
Axel Wolff

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**From:** Secondary Individual [mailto:Secondary Individual@uark.edu]  
**Sent:** Monday, November 27, 2017 9:31 AM  
**To:** Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>  
**Subject:** OLAW report - AR

Dr. Wolf,

Attached is the closeout memo for our voluntary non-compliance. I appreciate your patience with this Interim Director... B

Secondary Individual

*Ralph E. Martin Department of Chemical Engineering  
Interim Director of Compliance  
Associate Vice Provost for Research and Economic Development  
University of Arkansas*

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**From:** Wolff, Axel (NIH/OD) [E] [mailto:wolffa@od.nih.gov]  
**Sent:** Monday, November 20, 2017 10:33 AM  
**To:** Secondary Individual [mailto:Secondary Individual@uark.edu]  
**Subject:** RE: OLAW report

Thank you.

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**From:** Secondary Individual [mailto:Secondary Individual@uark.edu]  
**Sent:** Monday, November 20, 2017 11:12 AM  
**To:** Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>  
**Subject:** Re: OLAW report

Will do! Secondary Individual

Sent from my Galaxy Tab® A

----- Original message -----  
From: "Wolff, Axel (NIH/OD) [E]" <wolffa@od.nih.gov>

Date: 11/20/17 9:41 AM (GMT-06:00)  
To: [REDACTED] Secondary Individual [REDACTED]@uark.edu>  
Subject: OLAW report

Hello [REDACTED] Secondary Individual

I am following up on a June 5, 2017 letter from Dr. Coleman providing a preliminary report on the use of dogs and cats in a therapy activity and stated that a final would be submitted by June 30, 2017. To date we have not received the final report. Please submit this by the end of the week so we can finalize this case.

Thank you.

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



# UNIVERSITY OF ARKANSAS

June 5, 2017

Office of the Provost and Vice Chancellor for Academic Affairs

Re: Assurance Number A3878-01

Axel Wolff, D.V.M.  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health

Dear Dr. Wolff,

Pursuant to the requirements of the Animal Welfare Act, this letter serves as a voluntary reporting of non-compliance. The letter contains a description of the activity prompting this letter and the actions taken at the University of Arkansas to address the issue.

1. The use of dogs and cats in a class delivered by the Animal Science Department (Equine Assisted Therapy) on animal-based therapies was not disclosed to, nor approved by our IACUC. The course is described as

*Equine Assisted Activities and Therapies (EAAT) is a growing field of study with documented evidence of the benefits of horse-human interactions. This introductory level course is designed to train and educate students majoring in animal science, psychology, social work, education, nursing, kinesiology, and criminal justice. Students who take this course gain a science-based understanding of why and how animals can help people and the clientele best served with EAAT.*

There is no mention of animals other than horses in the course description, nor was the faculty delivering the course approved to include dogs and cats. Third party information (university news article dated April 21, 2017) informed the Office of Research Compliance of the potential issue. It was determined that these animals were indeed included in the activity.

The course was offered Fall 2016.

2. The Office of Research Compliance requested that the activity be suspended.
3. The Department of Animal Science suspended the activity.
4. Faculty involved in the activity have been instructed to provide a protocol involving dogs and cats in therapy applications to our IACUC for consideration.
5. Faculty involved in the activity will be required to take our online training entitled "Working with the IACUC".

A final report to the Office of Laboratory Animal Welfare will be forwarded to OLAW by the 30<sup>th</sup> of June, 2017. Should you have additional suggestions for the University as we further investigate the case, please contact me via email at (email address).

Regards,

Signature

Jim Coleman  
Provost and Executive Vice Chancellor for Academic Affairs

**Wolff, Axel (NIH/OD) [E]**

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Monday, June 12, 2017 7:39 AM  
**To:** [REDACTED]  
**Subject:** RE: Voluntary report

Thank you for this report, [REDACTED] We will respond soon.

Axel Wolff, M.S., D.V.M.  
Director, Division of Compliance Oversight  
OLAW

**From:** [REDACTED] [mailto:[REDACTED]@uark.edu]  
**Sent:** Sunday, June 11, 2017 9:29 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** Voluntary report

Please see attached PDF, sent on behalf of the University of Arkansas.

Regards,

[REDACTED]

Interim Director of Compliance

Sent from my Sprint Samsung Galaxy S® 6.