



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) 480-3387

February 20, 2020

Re: Animal Welfare Assurance  
#A3045-01 (OLAW Case 2B)

Sheila L. Vrana, Ph.D.  
Associate Dean for Research  
Penn State University – Hershey Medical Center  
Office of Research Affairs, (b) (4)  
500 University Drive, PO Box 850  
Hershey, PA 17033-0850

Dear Dr. Vrana,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your February 17, 2020 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Pennsylvania State University- Hershey Medical Center. The incident had been identified during the OLAW site visit. According to the information provided, OLAW understands that a laboratory which euthanized rodents with CO2 did not have a flow regulator, did not have posted instructions, and that staff was unfamiliar with how to correctly apply the CO2.

The corrective action consisted of the Institutional Animal Care and Use Committee (IACUC) directing the Principal Investigator to obtain a flow regulator, to post instructions by the euthanasia chamber, to have veterinary staff retrain the laboratory staff on CO2 euthanasia, and to have the IACUC reinspect the area once the corrections are complete. A subsequent inspection confirmed that all corrections had been completed.

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 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

## PENNSTATE HERSHEY

Milton S. Hershey  
Medical CenterSheila L. Vrana, Ph.D.  
Associate Dean for Research

February 17, 2020

## PENNSTATE HERSHEY



College of Medicine

Brent C. Morse, D.V.M.  
Animal Welfare Program Specialist  
Office of Laboratory Animal Welfare  
Division of Compliance Oversight  
6700B Rockledge Drive, Suite 2500, MSC 6910  
Bethesda, MD 20892-6910

Re: Conditions that jeopardize the health or well-being of animals, including natural disasters, accidents, and mechanical failures, resulting in actual harm or death to animals; Animal Welfare Assurance D16-00024 (A3045-01); 1R01NS089991

Dear Dr. Morse,

The Pennsylvania State University College of Medicine, in accordance with Assurance D16-00024 (A3045-01) and PHS Policy IV.F.3., provides this report of a noncompliance regarding an incident that was discovered during the OLAW site visit on November 21, 2019 when the researcher's lab was visited by the site visit team. The incident involved a lab that was conducting CO<sub>2</sub> euthanasia of rodents (mice and rats) in their laboratory and did not have appropriate equipment (flow regulator), nor instructions regarding flow rate posted. Additionally, a laboratory staff member was questioned by the site visit team on how mice were being euthanized, and did not convey knowledge regarding slow introduction of CO<sub>2</sub> into the cage as the first step of the appropriate two-stage method of CO<sub>2</sub> euthanasia.

To address the situation, the IACUC recommended the following corrective action plan:

1. The PI must obtain a flow regulator before conducting euthanasia in the lab.
2. The PI must post CO<sub>2</sub> euthanasia instructions by the euthanasia station.
3. All laboratory staff members conducting euthanasia will need to retrain on CO<sub>2</sub> euthanasia with veterinary.
4. A subset of the IACUC will reinspect the euthanasia station upon notification that a flow regulator and instructions are in place.

The findings of the investigation were reviewed at a convened meeting of the IACUC on November 25, 2019. A subset of the IACUC reinspected the lab on January 6, 2020 and verified that the flow regulator was purchased and installed, and that instructions were posted. On January 16, 2020 the lab confirmed that CO<sub>2</sub> euthanasia retraining had been completed. The IACUC recommended to the IO that the incident be reported to OLAW.

Please feel free to contact me if you require additional information.

Sincerely,

(b) (6)

Sheila Vrana, PhD  
Institutional Official  
Institutional Animal Care and Use Committee

Penn State Milton S. Hershey Medical Center • Penn State College of Medicine  
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Retrieved from Animal Research Laboratory Overview (ARLO)

## **Morse, Brent (NIH/OD) [E]**

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Tuesday, February 18, 2020 10:53 AM  
**To:** Vrana, Sheila; OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** IACUC; IACUCChair; (b) (6)  
**Subject:** RE: Communication from Penn State College of Medicine

Thank you for providing these reports Dr. Vrana. We will send official responses soon.

Best regards, Brent Morse

Brent C. Morse, DVM, DACLAM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health

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-----Original Message-----

From: Vrana, Sheila <svrana@pennstatehealth.psu.edu>  
Sent: Monday, February 17, 2020 1:53 PM  
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
Cc: IACUC <IACUC@pennstatehealth.psu.edu>; IACUCChair <IACUCChair@pennstatehealth.psu.edu>; (b) (6)  
(b) (6)  
Subject: Communication from Penn State College of Medicine

Dear Dr. Morse,  
Please see attached communications, and let me know if you have additional questions.  
Thank you  
Sheila Vrana

Sheila L. Vrana, Ph.D.  
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Associate Professor of Pharmacology  
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