



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

September 27, 2019

Re: Animal Welfare Assurance
#A3045-01 (OLAW Case 1Y)

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 September 18, 2019 letter regarding noncompliance with the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals at the Milton S. Hershey Medical Center, which had been preceded by a preliminary report to OLAW on July 19, 2019. According to the information provided, our office understands that a researcher deviated from an IACUC approved mouse study by using Complete Freund's Adjuvant (CFA) instead of Incomplete Freund's Adjuvant (IFA). The IACUC was notified by veterinary staff that mice had more skin ulcerations than expected, and upon discussion with the laboratory discovered the protocol deviation.

Immediate corrective measures consisted of humanely euthanizing the mice and requiring that only IFA be used. The IACUC required additional training for the Principal Investigator (PI) and staff regarding regulations governing animal research and requirements for protocol amendments. In addition, the IACUC suggested that the PI submit an amendment if CFA was deemed necessary for the study. However, the PI determined that the use of CFA was no longer necessary.

Based on its assessment of this explanation, OLAW understands that measures have been taken to prevent recurrence of this problem. Your institution may also wish to consider enhanced post-approval monitoring to ensure that the corrective measures are effective. In addition, it is unclear if this activity is PHS funded. If so, please ensure that no charges are made to the PHS grant for any unauthorized animal activities. Please also note that results from activities that were not IACUC-approved may encounter difficulties with publication. OLAW concurs with the actions taken by your institution to comply with the PHS Policy on Humane Care and Use of Laboratory Animals. We appreciate having been informed of this matter and find no cause for further action by this office at this time.

Sincerely,

(b) (6)

Nicolette Petervary, VMD, DACAW
Veterinary Medical Officer
Office of Laboratory Animal Welfare

cc: IACUC Chair

Obtained by Rise for Animals. Uploaded 08/31/2020

Retrieved from Animal Research Laboratory Overview (ARLO)

A3045-1V

PENNSTATE HERSCHEY



Milton S. Hershey
Medical Center

Sheila L. Vrana, Ph.D.
Associate Dean for Research

PENNSTATE HERSCHEY



College of Medicine

September 18, 2019

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: Implementation of significant change to IACUC-approved protocol without prior IACUC approval;
Animal Welfare Assurance D16-00024 (A3045-01); not PHS funded

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 in which mice developed skin ulcerations as a result of Complete Freund's Adjuvant (CFA) treatment. This incident was first reported to you on July 18, 2019 via a phone call by Dr. Ronald Wilson.

Veterinary staff noticed that a large percentage of mice were developing skin ulcerations due to injections related to the induction of a multiple sclerosis mouse model. Although the lab reported that ulcerations are expected for this work, literature does not support that Incomplete Freund's Adjuvant (IFA), as described on the current IACUC-approved protocol, would result in as many ulcerations as present. The lab confirmed they had treated mice with CFA and not IFA, as approved on their protocol, resulting in skin ulcerations.

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

1. That delivery of CFA would be discontinued, and IFA will be used, as described in the IACUC-approved protocol.
2. The IACUC recommended that the PI submit an amendment to add use of CFA, and include appropriate justification, if use is still necessary.
3. The principal investigator and laboratory staff were provided education regarding federal regulations governing IACUCs and animal research, as well as making changes to protocols.

The findings of the investigation were reviewed at a convened meeting of the IACUC on July 22, 2019. After some time, the principal investigator determined use of CFA was no longer necessary. 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
Office of Research Affairs, Mail Code H138, 500 University Drive, P.O. Box 850, Hershey, PA 17033-0850
Tel: 717-531-8495 • Fax: 717-531-0040 • svrana@psu.edu

An Equal Opportunity University



Obtained by Rise for Animals. Uploaded 08/31/2020

Retrieved from Animal Research Laboratory Overview (ARLO)

Ward, Joan (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Thursday, September 19, 2019 10:01 AM
To: Vrana, Sheila
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Communication from Penn State College of Medicine

Thank you for this final report Dr. Vrana. Dr. Morse will respond soon.

Regards,
Joan

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

From: Vrana, Sheila <svrana@pennstatehealth.psu.edu>
Sent: Thursday, September 19, 2019 8:48 AM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Wilson, Ronald <rwilson2@pennstatehealth.psu.edu>; IACUC <IACUC@pennstatehealth.psu.edu>; IACUCChair <IACUCChair@pennstatehealth.psu.edu>; Sheila Vrana <svrana@psu.edu>
Subject: Communication from Penn State College of Medicine

Please see attached correspondence from the Penn State College of Medicine. Feel free to contact me with additional questions.

Sheila Vrana

Sheila L. Vrana, Ph.D.
Associate Dean for Research
Associate Professor of Pharmacology
Penn State College of Medicine
500 University Drive, Box 850, (b) (4)
Hershey PA 17033-0850
(b) (6)
svrana@psu.edu



Initial Report of Noncompliance

By: gm

Date: 7/19/19

Time: Voicemail

Name of Person reporting: Ron Wilson, A/V
Telephone #: (b) (6)
Fax #: [REDACTED]
Email: [REDACTED]

Name of Institution: Penn. St. - Hershey
Assurance number: A3045

Did incident involve PHS funded activity? ?

Funding component:

Was funding component contacted (if necessary):

What happened? Mice on M.S. study injected w/ CFA instead of IFA. Developed severe skin ulcers → euthanized

Species involved: Mice

Personnel involved: Researchers

Dates and times:

Animal deaths: Yes, euthanized

Projected plan and schedule for correction/prevention (if known):

IACUC investigating

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY

Case #