



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
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

August 9, 2017

Re: Animal Welfare Assurance
A3102-01 [OLAW Case 1T]

Dr. Ann B. Nattinger
Senior Associate Dean for Research
Medical College of Wisconsin
8701 Watertown Plank Road
Milwaukee, WI 53226

Dear Dr. Nattinger,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your August 7, 2017 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Medical College of Wisconsin. According to the information provided, OLAW understands that eight live mice were found in the carcass cooler due to a failure to ensure death following exposure to CO₂ for euthanasia. The secondary physical method of euthanasia described in the protocol had not been used.

The immediate action taken upon discovery consisted of the veterinarian directing the Principal Investigator (PI) responsible to euthanize the animals using a secondary physical method of euthanasia. The Institutional Animal Care and Use Committee (IACUC) counseled the PI and required the PI and staff to undertake retraining on the appropriate conduct of euthanasia and to demonstrate proficiency. The protocol was amended to include a more robust method of ensuring appropriate euthanasia.

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,

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

cc: IACUC Chair



August 7, 2017

Axel V. Wolff, MS, DVM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
RKL 1, Suite 360, MSC 7982
6705 Rockledge Drive
Bethesda, MD 20892-7982

Re: Medical College of Wisconsin
Assurance Number: A3102-01
Animal Use Application: 3642

Dear Dr. Wolff,

We wish to report a noncompliant situation involving the euthanasia of some mice in a manner not consistent with IACUC approval. This letter will detail the incident and our IACUC's response. We are also notifying AAALAC, International.

Incident

On July 14, 2017, during a routine check of the necropsy cooler, some animal husbandry technicians noted movement in one of the cadaver bags. Upon closer inspection, they discovered that the bag had been recently placed in the cooler and contained 2 live adults and approximately 6 live neonatal pups in addition to several other deceased adult and neonatal mice. They immediately contacted a veterinarian.

The veterinarian assessed the animals in the bag and determined that in addition to the live adults and neonates, the bag contained approximately 30 deceased adults and 6 additional deceased pups. After confirming that the mice were separated appropriately and the surviving animals were stable, he immediately contacted the PI. She admitted that she was the one who had performed the euthanasias and that she may not have included the secondary method to ensure death for all the mice as was approved in her Animal Use Application. Under the veterinarian's supervision, she performed CO₂ euthanasia followed by cervical dislocation on the living adults and then proceeded to cervically dislocate all remaining (deceased) adults. The veterinarian decapitated each of the neonates.

IACUC Action

During the IACUC Meeting on July 19, 2017, the veterinarian informed the IACUC of the incident. The IACUC subsequently contacted the PI and due to the serious nature of the incident, instructed her to attend the next IACUC Meeting on August 2, 2017 in order to provide the provide a formal report describing her actions, the reason(s) behind them, and the steps she would take to prevent similar noncompliance in the future. She was also warned to come prepared to answer any additional questions the IACUC might pose.

The PI attended the August 2, 2017 IACUC Meeting and provided the information as requested. Based on her input and following a thorough discussion, the IACUC required the following actions be taken:

1. She and all members of her lab staff are to attend a BRC training session on how to properly perform physical methods of euthanasia (i.e. cervical dislocation, decapitation, and thoracotomy) in mice. As part of this session, anyone who will be performing euthanasia under AUA 3642 will be expected to demonstrate proficiency in the techniques. This training is to be completed within 2 weeks, by August 16, 2017.
2. Based on the results of this training session, the PI was instructed to amend AUA 3642 to incorporate a more robust method of ensuring euthanasia. This Animal Amendment (AA) is to be submitted after the training session but no later than August 23, 2017.

Records indicate that funding for AUA 3642 includes a grant from the National Institutes of Health (NIH) entitled *VISTA, a novel checkpoint that suppresses anti-tumor T cell responses*, R01CA164225.

Please let me know if you have questions.

Respectfully,



Ann B. Nattinger, MD, MPH
Senior Associate Dean for Research
8701 Watertown Plank Road
Milwaukee, WI 53226
O: [redacted]
F: [redacted] telephone #
Email: anatting@mcw.edu

cc: John D. Imig, PhD, MCW IACUC Chair
[redacted] Secondary individual MCW IACUC Manager
Joseph Thulin, DVM, DACLAM, MCW Attending Veterinarian
[redacted] Secondary individual MCW Legal Counsel

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Tuesday, August 08, 2017 1:56 PM
To: [REDACTED]
Subject: RE: Reportable Event - Medical College of Wisconsin, Assurance Number D16-00064 (A3102-01)

Thank you for this report. We will respond soon.

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

From: [REDACTED] [mailto:[REDACTED]@mcw.edu]
Sent: Tuesday, August 08, 2017 1:32 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Imig, John <jdimig@mcw.edu>; Thulin, Joseph <jthulin@mcw.edu>; [REDACTED] <[REDACTED]@mcw.edu>; Nattinger, Ann <anatting@mcw.edu>
Subject: Reportable Event - Medical College of Wisconsin, Assurance Number D16-00064 (A3102-01)

Hello,

Attached please find a written report of a reportable situation from the Medical College of Wisconsin, Assurance Number D16-00064 (A3102-01).

Respectfully,

[REDACTED]
[REDACTED]
IACUC Manager, Office of Research
Medical College of Wisconsin
8701 Watertown Plank Road
Milwaukee, WI 53226
Phone: [REDACTED]
Fax: [REDACTED]
Email: [REDACTED]@mcw.edu