



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

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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

December 10, 2019

Re: Animal Welfare Assurance  
A3865-01 [OLAW Case X]

Professor Joseph Incandella  
Vice Chancellor for Research  
University of California-Santa Barbara  
Office of Research  
(b) (4) Cheadle Hall  
Santa Barbara, CA 93106-2050

Dear Dr. Incandella,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your November 25, 2019 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of California – Santa Barbara. Your letter supplements the information contained in the preliminary phone report to our office on October 28, 2019. According to the information provided, OLAW understands that, subsequent to a PI submitting on July 15, 2019 a request to modify a protocol and behavior assay standard operating procedure to include cocaine, it was determined that a mouse had died on May 7, 2019 after cocaine administration. This mouse was one of 35 mice in the experimental cohort. Complications from the PI's IP injection technique may have led to the death of the one mouse. It is understood that the animal activity was funded by the PHS through a sub-award.

Corrective and preventive measures included the IACUC Chair reminding the PI that the data from the unapproved activities cannot be used for publication. The IACUC also determined that an email should be sent to the PI emphasizing the importance of the development of a plan to prevent future noncompliant incidents. In addition, the issue will be addressed as part of a seminar to be presented to the campus animal use community.

OLAW believes that the corrective and preventative measures put in place by the University of California – Santa Barbara are consistent with the provisions of the PHS Policy on Humane Care and Use of Laboratory Animals. **Please be advised** that it is your institution's responsibility to report this incident to the NIDA Chief Grants Management Officer copied below and to make sure that no expenses related to these noncompliant activities are charged to the grant. We appreciate being informed of this unfortunate incident and find no cause for further action by this office.

Sincerely,

(b) (6)

Brent C. Morse, DVM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare

cc: IACUC Contact  
Pamela Fleming, Chief Grants Management Officer, NIDA

# UC SANTA BARBARA

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Institutional Animal Care and Use Committee

Santa Barbara CA 93106-5062

Tel: (b) (6)

Fax:

Email: [iacuc@lifesci.ucsb.edu](mailto:iacuc@lifesci.ucsb.edu)

<https://www.research.ucsb.edu/compliance/animal-subjects/>

November 25, 2019

Animal Welfare Assurance A3865-01 (D16-00497)

Dr. Axel V. Wolff, Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
Rockledge One, Suite 360  
6705 Rockledge Drive  
Bethesda, MD 20892-7982

Dear Dr. Wolff,

In accordance with our Assurance and PHS Policy IV.F.3, I am writing to report an incident of protocol non-compliance involving the care and use of animals at the University of California, Santa Barbara. Below is the full investigation report into protocol #5-17-829.2 regarding the incident preliminarily reported to OLAW via a phone call from our IACUC Chair on October 28, 2019. The IACUC is convinced that appropriate remediations were enacted to prevent recurrence of the incidents described below.

## Summary of Investigation:

On July 15, 2019, the Principal Investigator (PI) submitted a request to modify a protocol and behavioral assay standard operating procedure (SOP) to include the use of cocaine with a place-conditioning assay and a taste-conditioning assay in

mice. During the subsequent pre-review of the modifications, the Attending Veterinarian (AV) inquired about a mouse that had died on May 7, 2019 during a cocaine place-conditioning experiment. The PI responded that the mouse was part of a cohort being used on his/her protocol 829.2. Since the modification request to conduct the cocaine place-conditioning assay had only just been submitted, the AV was able to determine that the experiment was performed without prior IACUC review and approval. The use of mice for any cocaine self-administration experiments had not been approved on the protocol, but had been approved in a previous version. A place-conditioning assay using mice had been approved for use on the protocol, but with methamphetamine as the experimental substance, not cocaine. At this point, the IACUC Office was notified of the situation by the AV. The IACUC Chair appointed a sub-Committee, comprised of himself and the AV, to investigate this incident further. The modification to the behavioral assay SOP was approved on July 23, 2019 and the protocol modification was approved on July 26, 2019.

On July 31, 2019, the IACUC Chair, Coordinator and AV met with the PI. The PI stated that s/he had assumed that the assay was approved for use in the current version of her/his protocol and had instructed one of his/her undergraduate lab personnel to conduct the assay. Of the 35 mice that had been run in this experiment, one mouse died and no other mice were reported as exhibiting health complications. Ten mice received injections of cocaine, while the rest were either being used as controls or were receiving other drugs. The AV stated that during the necropsy of the mouse that died on May 7th, he noted an abnormally large amount of fluid accumulated in the peritoneal cavity. The AV was unable to positively determine the exact cause of death, but stated that damage due to a misplaced intraperitoneal (IP) injection could have contributed. Misplaced IP injections have the potential to cause damage to the animal's bladder, which could account for the excess fluid (i.e., urine) in the peritoneal cavity. The AV also proposed that cocaine toxicity could have been a contributing factor to the animal's death. The mouse had received daily alternating IP injections of saline and cocaine over the course of five days (i.e., three injections of saline and two of cocaine), prior to death. The final IP injection the mouse received was of saline on May 6, 2019. The PI

confirmed that s/he was the individual that administered the injections. The AV subsequently observed the PI performing IP injections and provided some guidance on how to improve his/her technique.

The IACUC Chair presented this investigation report to the IACUC at a convened meeting on September 20, 2019. The sub-Committee determined that this incident occurred because the PI had mistakenly assumed that a procedure was approved for use on one protocol when in fact it had only been approved for use on a different protocol. The IACUC anticipates that the soon to be deployed Office of Research Animal Management System (ORAMS) will be helpful for all members of a protocol's roster determine what procedures are approved on each of their protocols. This protocol is funded by a subaward of NIH grant 1R01DA039168. The Committee voted that this incident is reportable to both OLAW and AAALAC.

On October 6, 2019, a letter was sent to the PI from the IACUC Chair to remind him/her that the IACUC cannot grant retrospective approvals; therefore, the data obtained from the animal experiments that were performed without IACUC approval (i.e., the cocaine place-conditioning experiment) cannot be used for publication. Additionally, the NIH could potentially ask for a reimbursement of funds that were used during the noncompliance. During the October 18, 2019 IACUC meeting, the Chair informed the Committee that he had sent this follow-up email to the PI. Due to other recent noncompliant incidents involving this PI, the Committee voted that another follow-up email should be sent to the PI to further emphasize the importance of her/him developing a plan to prevent future noncompliant incidents. The Committee also discussed how incidents such as these will be addressed at an upcoming "continuing education/refresher" seminar to be presented to the campus animal use community by the Chair to (i) remind everyone of the general principles involved in animal care and use, and (ii) review some of the most common issues that have arisen over the past few years on campus, with the goal of reducing the probability of future incidents. On October 28, 2019, the IACUC Chair made a preliminary report of this incident via phone call to OLAW's Division of Compliance Oversight. On November 4, 2019, the UCSB IACUC confirmed with the primary

awardee that it is acceptable for UCSB to send the final investigation report directly to OLAW and AAALAC.

If you have any additional questions or comments, please feel free to contact us.  
Thank you for your time.

Sincerely,

(b) (6)

Prof. Joseph Incandela  
Institutional Official  
Vice Chancellor for Research  
3227 Cheadle Hall  
University of California, Santa Barbara  
Santa Barbara, CA 93106-2050  
incandela@research.ucsb.edu

Cc: Dr. Stuart Feinstein, IACUC Chair  
Dr. Manuel Garcia, Campus Veterinarian  
IACUC Office

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, December 06, 2019 7:30 AM  
**To:** IACUC Office; OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** Joseph Incandela; Manny Garcia; Stu Feinstein; (b) (6)  
**Subject:** RE: Incident Report for A3865-01

Thank you for providing this report. We will send an official response soon.

Best regards, Brent Morse

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

Please note that this message and any of its attachments are intended for the named recipient(s) only and may contain confidential, protected or privileged information that should not be distributed to unauthorized individuals. If you have received this message in error, please contact the sender.

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

**From:** IACUC Office [mailto:iacuc@lifesci.ucsb.edu]  
**Sent:** Thursday, December 05, 2019 7:00 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Joseph Incandela <incandela@research.ucsb.edu>; Manny Garcia <manuel.garcia@ucsb.edu>; Stu Feinstein <feinstei@ucsb.edu>; (b) (6)  
**Subject:** Incident Report for A3865-01

To Whom It May Concern:

Attached is a letter that details an incident of protocol noncompliance at the University of California, Santa Barbara (A3865-01).

The UCSB IACUC has investigated and reviewed the incident. This report includes the summary of the incident, as well as any Committee corrective actions.

Please let me know if there are any questions.

Sincerely,  
(b) (6)

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(b) (6)





## Initial Report of Noncompliance

By: BGMDate: 10/28/19Time: 2:05

Name of Person reporting: George Feinstein, Chair  
 Telephone #: (b) (6)  
 Fax #: (b) (6)  
 Email: (b) (6)

Name of Institution: UC Santa Barbara  
 Assurance number: A3865

Did incident involve PHS funded activity? \_\_\_\_\_Funding component: \_\_\_\_\_Was funding component contacted (if necessary): \_\_\_\_\_

What happened? Cocaine given to mice for behavioral assays but cocaine not on current protocol. Possible death of mouse due to poor I.P. injection.  
 Species involved: Mouse  
 Personnel involved: PI  
 Dates and times: 1st death on May 8th, IACUC informed in July  
 Animal deaths: Yes, total 4 mice

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

Retraining of PI by Vet + retraining of researchers at a symposium.

Projected submission to OLAW of final report from Institutional Official:

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Case # \_\_\_\_\_