



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 21, 2020

Re: Animal Welfare Assurance  
#A3336-01 (OLAW Case 60)

Dr. Lisa Cassis  
Vice President for Research  
University of Kentucky  
(b) (4) Main Building  
Lexington, KY 40506-0032

Dear Dr. Cassis,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your February 20, 2020 letter reporting a serious deviation from the provisions of the Guide for the Care and Use of Laboratory Animals at the University of Kentucky. According to the information provided, OLAW understands that mice from multiple cages were crowded into one cage in order to apply CO2 for euthanasia.

The immediate action taken upon discovery consisted of counseling the research staffer, separating the mice, and then appropriately euthanizing them. Although the individual had been trained, he was unaware that overcrowding was prohibited. The institutional policy on euthanasia was forwarded to the Principal Investigator (PI), the PI was counseled to follow the policy, and all staff conducting euthanasia under this protocol was retrained.

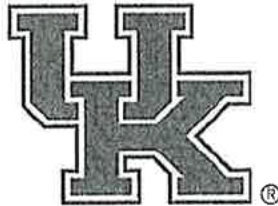
Based on its assessment of this explanation, OLAW understands that measures have been implemented to correct and prevent recurrence of this problem. OLAW concurs with the actions taken by the institution to comply with the PHS Policy on Humane Care and Use of Laboratory Animals.

Sincerely,

(b) (6)

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

cc: IACUC Chair

**Office of the Vice President for Research**

311 Main Building  
Lexington, KY 40506-0032  
(859) 257-5294  
Fax: (859) 323-2800  
[www.research.uky.edu](http://www.research.uky.edu)

February 20, 2020

Axel Wolff, M.S., D.V.M.  
Deputy Directory  
Office of Laboratory Animal Welfare  
National Institutes of Health  
RKL1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, MD 20892-7982

Reference: Animal Welfare Assurance D16-00217 (A 3336-01)  
University of Kentucky

Dear Dr. Wolff:

The University of Kentucky Institutional Animal Care and Use Committee (IACUC), through the Institutional Official, is reporting the following noncompliance and deviation from the *PHS Policy on the Humane Care and Use of Laboratory Animals* as required by section IV, F, 3a of the PHS Policy.

This incident was initially reported by email on February 20, 2020.

A research staff member was observed to be preparing to euthanize mice using carbon dioxide. Mice from multiple cages had been combined into one and were overcrowded. The research staff member was immediately counseled and assisted with separating the mice into groups that avoided overcrowding; the mice were then euthanized. Though this staff member had undergone IACUC-required training and was confirmed by the PI as being proficient with respect to euthanasia, he claimed that he did not understand that mice should not be combined and overcrowded prior to euthanasia.

In response to this noncompliance, the IACUC has forwarded to the PI the institutional policy regarding euthanasia along with the expectation that the policy be followed by all those performing euthanasia. In addition, all personnel conducting euthanasia under the associated protocol have been required to undergo a formal hands-on euthanasia training session offered by the University of Kentucky Division of Laboratory Animal Resources within 30 days.

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The IACUC believes that this action is an appropriate response to prevent similar future incidents. These studies were funded through grants from the NIH National Cancer Institute (2R01CA133429-08; and 1R01CA208343).

If you have questions concerning this incident, please contact Dr. Mark A. Suckow, Attending Veterinarian ([msuckow@uky.edu](mailto:msuckow@uky.edu); (b) (6)), Dr. M. Paul Murphy, IACUC Chair ([mpmurp3@uky.edu](mailto:mpmurp3@uky.edu); (b) (6)), or Dr. Lisa A. Cassis, Institutional Official ([lcassis@uky.edu](mailto:lcassis@uky.edu); (b) (6)).

Sincerely,

(b) (6)

Lisa A. Cassis, Ph.D.  
Vice President for Research  
Institutional Official

(b) (6)

M. Paul Murphy, Ph.D.  
Chair, Institutional Animal Care and Use Committee

(b) (6)

Mark A. Suckow, DVM, DACLAM  
Attending Veterinarian

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, February 21, 2020 6:50 AM  
**To:** Suckow, Mark A.  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Preliminary reports

Thank you for these reports, Dr. Suckow. In this instance, if the final report is sent a few hours after the preliminary then please just send the final. The preliminary should be sent as soon as the problem is discovered. For instance, in the fish case the report should have been sent as soon as the missed inspection was discovered in November or shortly thereafter.

Thanks.

Axel Wolff

**From:** Suckow, Mark A. <msuckow@uky.edu>  
**Sent:** Thursday, February 20, 2020 2:55 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** Re: Preliminary reports

Dear Dr. Morse,

Attached please find full reports for the two instances of non-compliance that I communicated to you earlier today, February 20, 2020.

Best,

Mark A. Suckow, DVM, DACLAM  
Associate Vice President for Research  
Attending Veterinarian  
Professor, Department of Biomedical Engineering  
University of Kentucky  
(b) (4) Bowman Hall  
Lexington, KY 40506

(b) (6)

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**From:** Suckow, Mark A.  
**Sent:** Thursday, February 20, 2020 10:05 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** Preliminary reports

Dear Dr. Morse,

I wish to submit two preliminary reports of non-compliance for the University of Kentucky (Assurance #D16-00217; A3336-01):

1. A new satellite facility housing zebrafish was not included in the most recent semi-annual facility inspection. The inspection was done once the omission was recognized.
2. Cages of mice were combined for euthanasia and the combined number resulted in crowding of mice within the chamber. This occurrence was the result of research personnel not following institutional policy.

Full reports for both instances of non-compliance will be submitted.

Regards,

Mark A. Suckow, DVM, DACLAM  
Associate Vice President for Research  
Attending Veterinarian  
Professor, Department of Biomedical Engineering  
University of Kentucky  
(b) (4) Bowman Hall  
Lexington, KY 40506  
(b) (6)