



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

April 27, 2020

Re: Animal Welfare Assurance
#A3237-01 (OLAW Case 3G)

Ms. Steffani Webb
Vice Chancellor for Administration
Institutional Official
University of Kansas Medical Center
3901 Rainbow Road, MS 2015
Kansas City, KS 66160

Dear Ms. Webb,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your April 15, 2020 letter reporting an incident of noncompliance with the PHS Policy on the Humane Care and Use of Laboratory Animals at the University of Kansas Medical Center. According to the information provided, OLAW understands that on February 28, 2020 a Senior Research Associate found a live rat in a carcass freezer. The rat was subsequently euthanized with CO₂ followed by bilateral thoracotomy. Four additional frozen rat carcasses were found in the freezer and subsequently found to have been euthanized improperly. The animal activity associated with this incident was PHS supported.

Corrective and preventive actions included the lab member associated with the incident being restricted from performing euthanasia until retraining was completed. This training was completed on March 18, 2020. The IACUC will continue to stress the requirement for a secondary, mechanical method of euthanasia via various outreach methods.

OLAW believes that the corrective and preventive measures put in place by the University of Kansas Medical Center are consistent with the provisions of the PHS Policy on Humane Care and Use of Laboratory Animals for self-monitoring and self-correction. We appreciate being informed of this incident and find no cause for further action by this office.

Sincerely,

Brent C. Morse -S

Digitally signed by Brent C.
Morse -S
Date: 2020.04.27 12:43:16 -04'00'

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

cc: IACUC Contact

April 15, 2020

Brent Morse, DVM, DACLAM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
Rockledge One, Suite 360
6705 Rockledge Drive – MSC 7982
Bethesda, MD 20892-7982

Regarding: University of Kansas Medical Center -- Assurance #A3237-01

Research Project: Transcriptional Control of Mammalian Placenta Development
IACUC Number: 2017-2391

Funding Agency: NIH-NICHD R01 HD062546

Dear Dr. Morse:

In accordance with PHS Policy IVF.3b and internal policy, the University of Kansas Medical Center (KUMC) Institutional Animal Care and Use Committee (IACUC) is reporting a deviation from the provisions of the *Guide* as well as our institutional policies and SOPs.

On Friday, 2/28/20, a Senior Research Associate (SRA) opened a vivarium morgue freezer and discovered a conscious and ambulatory rat with a superficial cut through the skin on the back of the neck. The SRA immediately called the LAR Clinical Veterinarian (CV) and was asked to begin CO2 asphyxiation. Please note that the SRA has over 18 years of rat handling experience and is PI on a microsurgical skills training protocol involving rats as models for surgical residents at KUMC. The CV subsequently arrived and performed bilateral thoracotomy to complete euthanasia.

Importantly, this event occurred prior to and is unrelated to any reduction in workforce (beginning 3/17/2020) and/or rodent colonies due to the COVID-19 pandemic.

Specific Corrective Action:

After the animal described above was euthanized, LAR staff found 4 additional rats dead in the morgue freezer which were then allowed to thaw. Further examination also indicated that an improper or incomplete secondary method of euthanasia had been performed on each of these animals. Based upon ear tags and deactivated LAR census cards, the AV determined that the rats were likely associated with the ACUP listed above and on 3/4/20 contacted the PI. On 3/6/2020, the PI confirmed these findings and agreed send an Adverse Event report to the IACUC. In addition, on 3/9/2020, the PI stated that the lab member responsible had been restricted from performing euthanasia pending retraining by LAR, and retraining was completed on 3/18/2020.

IACUC and Regulatory Affairs for Biological Sciences (RABS) Action:

This information was presented to the convened IACUC on 3/17/2020. After discussion, the IACUC determined that the incident was remediated appropriately pending completion of retraining. In addition, the IACUC voted unanimously to report this incident of noncompliance to the relevant regulatory and accrediting agencies. This information is also being provided to the Association for the Accreditation of Laboratory Animal Care (AAALAC).

The IACUC and RABS office, in conjunction with LAR, will continue to stress the importance of performing a complete secondary mechanical method of euthanasia following CO2 asphyxiation per 2011 AVMA Guidelines and KUMC policy during animal user training, post-approval monitoring and additional outreach efforts such as elevator signage and quarterly newsletters or institutional "town-hall" events.

If you have questions or need more information, please feel free to contact me at (b) (6)

Sincerely,

(b) (6)

Steffani Webb
Vice Chancellor for Administration

cc:

(b) (6)

Nathan Culley, DVM, DACLAM, Chair, IACUC
Douglas Brandt, DVM, Executive Director, Laboratory Animal Sciences, Attending Veterinarian

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Wednesday, April 22, 2020 7:17 AM
To: Nathan Culley
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Incident Report for the University of Kansas Medical Center A3237-01

Thank you for these reports, Dr. Culley. We will respond soon.
Axel Wolff

From: Nathan Culley <nculley@kumc.edu>
Sent: Monday, April 20, 2020 3:24 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Iacuc <IACUC@kumc.edu>
Subject: Incident Report for the University of Kansas Medical Center A3237-01

Dr. Morse,

Please find attached, two (2) animal welfare compliance report letters from the University of Kansas Medical Center (A3237-01). Please let me know if you have any further questions regarding the reports. Hope you are staying safe.

Regards,

Nathan C Culley, DVM, DACLAM
IACUC Chair
Executive Director, Regulatory Affairs for Biological Sciences
University of Kansas Medical Center
nculley@kumc.edu
(b) (6)