



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

October 2, 2019

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

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 July 10, 2019 letter reporting an incident of noncompliance with the Public Health Service 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 June 10, 2019, a principal investigator (PI) informed the University of Kansas Medical Center Office of Regulatory Affairs for Biological Sciences that a laboratory member did not perform a secondary method of euthanasia following CO₂ asphyxiation according to the approved IACUC protocol and failed to ensure animal death per the AVMA Guidelines for the Euthanasia of Animals. As a result, one rat regained consciousness and was discovered in the freezer. Upon discovery, the rat was immediately euthanized, and death was confirmed in all remaining animals. The letter indicated that the associated animal work was funded by a National Institutes of Health grant.

The PI ordered laboratory members to cease euthanasia procedures until each member demonstrated proficiency and was certified by the PI or laboratory manager. The responsible laboratory member's live animal use privileges were revoked for the remainder of the individual's time at the University of Kansas Medical Center. The lab member was said to be accepting a position at another institution later in the summer. The IACUC, Office of Regulatory Affairs for Biological Sciences, and Laboratory Animal Resources will continue to stress the importance of performance of euthanasia per the AVMA Guidelines for the Euthanasia of Animals as approved on each protocol through continued training, communications during research department meetings, post-approval monitoring reviews, signage, and quarterly newsletters.

OLAW concurs with the IACUC that the PI-initiated corrective actions were appropriate and accepts the described continued efforts to ensure proper euthanasia is carried out. We appreciate being informed of these matters and find no cause for further action by this Office at this time.

Sincerely,

(b) (6)

Jane Na, DVM, CPIA
Veterinary Medical Officer, OLAW
National Institutes of Health

cc: IACUC Contact



July 10, 2019

Axel Wolff, MS, DVM
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: Reproduction Research: Rat Models
IACUC Number: 2019-2495

Funding Agency: NIH-NICHD R01-HD020676

Dear Dr. Wolff:

In accordance with PHS Policy IV.F.3, the University of Kansas Medical Center (KUMC) Institutional Animal Care and Use Committee (IACUC) is reporting a deviation from the provisions of the *Guide*, the AVMA Guidelines for Euthanasia, and our institutional policies and SOPs.

On June 10, 2019 the PI associated with ACUP 2016-2335 contacted the KUMC Office of Regulatory Affairs for Biological Sciences (RABS) to report that a laboratory member had failed to properly perform a secondary method of euthanasia following CO₂ asphyxiation. As a result, one rat regained consciousness and was discovered in the morgue freezer soon after while training a new member of the lab. Upon discovery, the rat was immediately euthanized, and Laboratory Animal Resources (LAR) and research personnel worked in concert to identify and confirm death in all remaining animals.

Specific Corrective Action:

After tending to immediate animal welfare concerns, the PI ordered a cessation of euthanasia procedures by each laboratory member until proficiency was demonstrated and certified by the PI or laboratory manager. In addition, the responsible lab member, who will be accepting a position at another institution later in the summer, was restricted from future live animal work while completing studies at KUMC.

Axel Wolff, MS, DVM
July 10, 2019
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IACUC and RABS Action:

This information was presented to the convened IACUC on June 18, 2019. Following discussion, the IACUC determined that PI-initiated remediation was appropriate and further voted unanimously to report this incident 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 humanely performing euthanasia per AVMA guidelines and as approved on each ACUP. Rodent euthanasia by CO2 asphyxiation followed by an approved secondary method is a required component of training for all new animal users at KUMC. Additional avenues of training include research department meetings, Post-Approval Monitoring reviews and/or additional communications through signage and quarterly newsletters. 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: Friday, July 12, 2019 10:42 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 send responses soon.
Axel Wolff

From: Nathan Culley <nculley@kumc.edu>
Sent: Friday, July 12, 2019 9:59 AM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Subject: Incident Report for the University of Kansas Medical Center A3237-01

Dr. Wolff,

Please find attached, three (3) animal welfare compliance report letters from the University of Kansas Medical Center (A3237-01). One report is a little delayed due to our AAALAC site visit in June, I apologize for that. Please let me know if you have any further questions regarding the reports.

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)