



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare  
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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  
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October 30, 2017

Re: Animal Welfare Assurance  
A4499-01 [OLAW Case T]

Laura Levy, Ph.D.  
Vice President for Research  
Tulane University Uptown Campus  
1440 Canal Street, [REDACTED] TW-5  
New Orleans, LA 70112-2709

Dear Dr. Levy,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your October 17, 2017 letter reporting non-compliances with the PHS Policy on the Humane Care and Use of Laboratory Animals at Tulane University documented in the IACUC's Calendar Year 2017 semi-annual inspections. According to the information provided, OLAW understands that:

1. For protocol 0329R3 Performing mouse CO2 euthanasia using a broken regulator/flow meter. Corrective actions included moving the euthanasia procedure to DCM facilities until a new regulator/flow meter was installed. After new meter was installed the lab was give the CO2 rate formula calculation. The lab was also performing CO2 euthanasia without the required secondary method. The lab was retrained on secondary method. On the same protocol adult mice were tail-snipped without the required anesthesia. All staff were trained on the proper procedure. Also, a lab member was performing animal procedures under this protocol without being approved to do so. The protocol was amended to add the lab member. This protocol was funded by the NIH.
2. For protocol 0474 expired Xylazine had been used to anesthetize rats in the lab. Corrective actions included instructing the lab staff to discard the drug and purchase new stock. A follow-up visit confirmed that this was done. This protocol was funded by the NIH and the NSF.

OLAW believes that the corrective measures put in place by Tulane University are consistent with the provisions of the PHS Policy on Humane Care and Use of Laboratory Animals. It is understood that, although the animal activities were funded by NIH and NSF, the non-compliances did not result in financial impacts that required reporting to the funding components or financial reconciliation. Subsequent PAM showed compliance with the IACUC-approved protocols. OLAW requests that you review the reporting requirements as outlined under "Reporting Noncompliance" on our website and that your program institute prompt reporting of incidents and not "batch" the reports. Our office is available if you wish to discuss this further. OLAW accepts the corrective and preventive measures and finds no cause for further action by this office.

Page 2 – Dr. Levy  
October 30, 2017  
OLAW Case A4499-T

Sincerely,

Signature

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

cc: IACUC contact  
NSF Animal Welfare Officer



Laura S. Levy, Ph.D.  
*Professor of Microbiology & Immunology*  
*Vice President for Research*

October 17, 2017

Brent Morse, DVM  
 Acting Director  
 Division of Compliance Oversight  
 Office of Laboratory Animal Welfare ("OLAW")  
 Via email: [morseb@mail.nih.gov](mailto:morseb@mail.nih.gov)

Initial Final Report re. Noncompliance; Semi-annual Inspections Conducted in Calendar Year 2017

Dear Dr. Morse:

Tulane University, in accordance with Animal Welfare Assurance and PHS Policy IV.F.3, provides this initial and final report of noncompliance regarding the following reportable issues identified during the IACUC's semi-annual inspections conducted during calendar year 2017 and where the research was funded by the PHS or the NSF:

Protocol No.	Species	Reportable Issue	Corrective Actions	Completion Date	Funding
January/February 2017 Inspection					
0329R3	Mice	Performing CO <sub>2</sub> euthanasia with a broken regulator/flow meter gauge on the CO <sub>2</sub> tank.	Conduct CO <sub>2</sub> euthanasia in DCM facilities until regulator/flow meter gauge is repaired.	Follow-up visit conducted 2/6/17 confirmed that a new regulator/flow meter was installed. CO <sub>2</sub> flow rate formula calculation was given to lab members.	NIH
0329R3	Mice	Performing CO <sub>2</sub> euthanasia without performing the secondary method per protocol.	Training for all staff on secondary method.	Training conducted on 1/26/17.	NIH

Signature

Secondary Individual

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

**From:** Morse, Brent (NIH/OD) [E]  
**Sent:** Wednesday, October 18, 2017 7:42 AM  
**To:** Secondary Individual  
**Cc:** Levy, Laura S; Garrison, Sheila H  
**Subject:** RE: Initial and Final Report - Noncompliance

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

Regards, Brent Morse

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

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**From:** Secondary Individual [mailto:Secondary Individual@tulane.edu]  
**Sent:** Tuesday, October 17, 2017 2:38 PM  
**To:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>  
**Cc:** Levy, Laura S <llevy@tulane.edu>; Garrison, Sheila H <sgarriso@tulane.edu>  
**Subject:** Initial and Final Report - Noncompliance

Dear Dr. Morse,

Attached, please find the Tulane University Institutional Official's initial and final report regarding issues identified as part of the Tulane IACUC's semi-annual inspections conducted in 2017.

Thank you for your assistance and consideration, and please do not hesitate to contact us if you have questions or require further information.

Sincerely,

Secondary Individual

University Research Compliance Officer  
 Tulane University #8401  
 1440 Canal Street, Room #  
 New Orleans, LA 70112-2709  
 office phone: Phone Number  
 mobile phone: Phone Number  
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