



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

August 22, 2018

Re: Animal Welfare Assurance  
#A3971-01 (OLAW Case B]

Dr. William Polik  
Associate Dean for Research and Scholarship  
IACUC Institutional Officer  
Hope College  
36 East 12<sup>th</sup> Street  
Holland, Michigan 49423

Dear Dr. Polik,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your June 30, 2018 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Hope College, following up on an initial telephone report on May 23, 2018. According to the information provided, OLAW understands that a live fish was brought into the facility for display purposes without prior approval by the Institutional Animal Care and Use Committee. There were no problems with the health or care of the fish.

The corrective action consisted of the Institutional Official, Attending Veterinarian, IACUC Chair, and the Biology Laboratory Coordinator confirming institutional policy which states that animals may only be added to the museum collection following IACUC approval and provision of a veterinary care sheet. The fish would be maintained and the decisions were shared with the Animal Care Specialist.

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. Thank you for keeping OLAW apprised on this matter.

Sincerely,

(b) (6)

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

cc: IACUC Chair



# Hope COLLEGE

June 30, 2018

Axel Wolff, DVM  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
Rockledge 1, Suite 360  
6705 Rockledge Drive  
Bethesda, MD 20892

Dear Dr. Wolff:

Hope College, in accordance with Assurance A3971-01 and PHS Policy IV.F.3., provides this report of noncompliance regarding a situation where a vertebrate animal (green coris wrasse) was admitted into our facilities without an approved IACUC protocol.

On May 1, 2018, it came to the attention of the IACUC Chair, Susan M. Fraley, DVM, that there was a fish in our live animal museum (the Van Kley Museum) that had not been specifically approved by the IACUC. There is an approved protocol for housing vertebrate animals in this space, "Van Kley Museum Animal Presentations," approval number 011801, but the Committee has previously mandated that no new vertebrate animals are to be housed there without specific Committee approval, including a new proposal and veterinary care guides. Consequently, we are out of compliance. However, we would like to make it clear that there at no time has been concern regarding the health and welfare of this or any other animal. The Animal Care Specialist and her staff have a great deal of experience taking care of salt water fish, and this fish's habitat and nutritional plan has been excellent.

The following corrective action plan was implemented:

1. Upon discovery of the fish on May 1, 2018, Dr. Harris (Program Veterinarian) and Dr. Fraley (Chair of IACUC and Consulting Veterinarian) asked (b) (6) about the arrival of the fish. Since (b) (6) was on leave at the time the fish was admitted to the facility, she had no information as to how this came about. Dr. Harris asked if she could gather some more information over the next week or so to report back.
2. On May 2, 2018 Dr. Fraley contacted Dr. Will Polik (Institutional Officer) to alert him to the issue and expressed hope of meeting with relevant parties within the next few weeks. Dr. Fraley also called the Division of Compliance Oversight to inform your office of the situation.
3. It was (b) (6) who admitted the fish into the museum. It was placed in a quarantine tank at that time, in accordance with the protocol for salt water fish and was cared for appropriately.
3. There were many email communications over the next many weeks between Dr. Harris, Dr. Fraley and Dr. Polik but unfortunately travel plans prevented a meeting as quickly as was originally hoped. On June 14, a meeting took place to discuss the situation. The meeting was attended by Dr. Polik, Dr. Fraley, Dr. Harris and (b) (6). We discussed and confirmed the

OFFICE OF THE ASSOCIATE DEAN FOR RESEARCH AND SCHOLARSHIP

35 East 12th Street, Room 3107, PO Box 9000, Holland, MI 49422-9000 | 616.395.7265 | fax 616.395.7639 | [hope.edu/research-scholarship](http://hope.edu/research-scholarship)

Dr. Wolff, page 2:

policy that vertebrate animals may only be added to the museum collection after a proposal has been approved and that the proposal must include a veterinary care sheet. It was decided that we would keep the fish in question.

4. The discussion was relayed to (b) (6) who is in charge of the museum.

Hope College is dedicated to ensuring the health and welfare of the animals we use in research and teaching. We deeply regret this noncompliance. We have reviewed our Program and are confident that this oversight will not happen again.

We also appreciate the guidance and assistance provided by OLAW. If you have any questions regarding this report, please contact:

Susan M. Fraley, DVM, Hope College IACUC Chair

[fraleys@hope.edu](mailto:fraleys@hope.edu)

(b) (6)

Sincerely,

(b) (6)

William Polik, PhD  
Associate Dean for Research and Scholarship  
IACUC Institutional Officer

**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Wednesday, August 22, 2018 6:20 AM  
**To:** Susan Fraley  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Letter re Noncompliance

Thank you for this report, Dr. Fraley. I would have contacted you soon to remind you but as you have submitted the letter, I will send an official response shortly.

Axel Wolff, M.S. D.V.M.  
Deputy Director, OLAW

**From:** Susan Fraley [mailto:fraleys@hope.edu]  
**Sent:** Tuesday, August 21, 2018 3:09 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** Re: Letter re Noncompliance

Oops, here's the actual letter.

Susan M. Fraley, D.V.M.  
HCACUC Chair - Hope College  
Veterinarian - South Crossing Veterinary Center  
Adjunct Professor, Department of Biology - Hope College  
email: [fraleys@hope.edu](mailto:fraleys@hope.edu)  
phone: (b) (6)  
fax: (b) (6)

On Tue, Aug 21, 2018 at 3:08 PM, Susan Fraley <[fraleys@hope.edu](mailto:fraleys@hope.edu)> wrote:

Dear Dr. Wolff,

I am so very sorry this letter took such a long time to make its way to you. Summer travel plans never seemed to mesh. Please let me know if you need any more information and thank you for your help when I called back in May! Have a wonderful afternoon!  
Susan

Susan M. Fraley, D.V.M.  
HCACUC Chair - Hope College  
Veterinarian - South Crossing Veterinary Center  
Adjunct Professor, Department of Biology - Hope College  
email: [fraleys@hope.edu](mailto:fraleys@hope.edu)  
phone: (b) (6)  
fax: (b) (6)



## Initial Report of Noncompliance

By: aw

Date: 5/23/18

Time: 2:00

Name of Person reporting: Susan Freely

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: Hope College

Assurance number: A3971

Did incident involve PHS funded activity? \_\_\_\_\_

Funding component: \_\_\_\_\_

Was funding component contacted (if necessary): \_\_\_\_\_

What happened?

Collection of live vertebrates for display. Fish brought in without protocol.

Species involved: Fish

Personnel involved:

Dates and times:

Animal deaths:

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

Make a policy that only animals on protocol can be brought in.

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY

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