



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 12, 2019

Re: Animal Welfare Assurance
#A3971-01 (OLAW Case D)

Gerald Griffin, PhD
Associate Provost for Academic Affairs
Associate Professor of Biology & Psychology
IACUC Institutional Officer
Hope College
36 East 12th Street
Holland, Michigan 49423

Dear Dr. Griffin,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your July 23, 2019 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Hope College. According to the information provided, OLAW understands that 22 fish were captured in the wild, euthanized, and tested for heavy metals although this activity had not been approved by the Institutional Animal Care and Use Committee (IACUC). Appropriate licenses were in place.

Another such study was scheduled to begin but the IACUC chair directed the investigators to obtain IACUC approval. A protocol was submitted and approved by the IACUC. The professors and students were counseled on the institutional training requirements, deans and department heads were informed about the requirement for IACUC approval for all live vertebrate animal activities, and the institutional website will be updated regarding animal care and use regulations.

Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate, correct, and prevent recurrence of the noncompliance. Please also advise your staff that IACUC approval is usually required by scientific journals for publication of animal generated data. We appreciate having been informed about this matter and find no cause for further action by this Office.

Sincerely,

(b) (6)

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

cc: IACUC Chair



Hope COLLEGE

July 23, 2019

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 an occurrence where vertebrate animals were used for teaching and research purposes without IACUC approval.

On May 31, 2019 it came to the attention of the IACUC Chair, Susan M. Fraley, DVM, that there was a course during the Fall 2018 semester (Geological & Environmental Sciences 401: Advanced Environmental Seminar) during which fish were being caught from a local lake for the purposes of measuring heavy metals. This was an independent project and the student and advisor were not aware that an Animal Protocol needed to be submitted and approved. From September to November, the student (who is reportedly an excellent fisherman) caught 17 yellow perch and 5 channel catfish. After being caught they were suffocated on ice in a cooler and decapitated, after which tissues were harvested for heavy metal testing. The appropriate local and state licenses had been obtained prior to fishing.

The following corrective action plan was implemented after the incident:

On May 31, 2019, after discovering this and learning that the Geology Department was about to proceed with a further study along these lines, Dr. Fraley emailed the Geology professors involved to explain what the regulations are and that they could not start that project until the proper applications had been submitted and approved by the IACUC. The (b) (6) and incoming Institutional Officer (Dr. Gerald D. Griffin) and the (b) (6) were included in this email conversation as well. There were several more email conversations between the Chair and Geology professors over the next few days to gather information about the non-compliance.

On June 2 Dr. Fraley contacted your office via email to alert you of the problem and to set up a time for a phone call. You set up a time for the morning (in the U.S.) of June 5. Unfortunately, these numbers were blocked from China so she sent a detailed email describing the noncompliance. You immediately wrote back with much-appreciated counsel. Dr. Fraley also had an email conversation with Dr. Gopee at your office about requirements for live-caught fish.

After several email and in-person conversations with Dr. Fraley, (b) (6) submitted a proposal for a similar project this summer. The proposal was reviewed by the Full Animal Care and Use Committee and accepted with minor clarifications that were done and finally approved by Designated Member Review (Dr. Fraley was the DMR for this application). Dr. Fraley also met with (b) (6) and the two students who will be catching the fish to go through all of Hope

DEPARTMENT OF GEOLOGY

35 East 12th Street, PO Box 9000, Holland, MI 49422-9000 | 616.395.7720 | fax 616.395.7125

College's regular training requirements, on June 28.

On July 9 Dr. Fraley met in person with (b) (6)

(b) (6)

to gather details about the noncompliance last Fall.

On July 24 Dr. Fraley met with me about what further action needs to occur. As Hope College's Institutional Officer and Associate Provost for Academic Affairs, I am in the process of communicating with all Deans and department heads about the IACUC requirements for the use of any vertebrate animal. They will be provided with written resources that explain our commitment to the execution of quality, ethical research. Additionally, my office is in the process of making the college's website even more clear in regards to research policies, including animal care and use regulations.

Hope College is dedicated to ensuring the health and welfare of the animals we use in research and teaching and we deeply regret this noncompliance. 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

(b) (6)

Sincerely,

(b) (6)

Gerald Griffin, PhD
IACUC Institutional Officer
Associate Provost for Academic Affairs
Associate Professor of Biology & Psychology
Hope College

Ward, Joan (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Monday, August 5, 2019 9:37 AM
To: 'Susan Fraley'
Subject: RE: Noncompliance Report from Hope College

Thank you for this report Dr. Fraley. Dr. Morse will respond soon.

Regards,
Joan

From: Susan Fraley <fraleys@hope.edu>
Sent: Thursday, August 1, 2019 10:31 AM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Subject: Noncompliance Report from Hope College

Please find attached our report about a noncompliance that occurred last fall and came to our attention this summer. Please let me know if you have any questions.
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
phone: (b) (6)
fax: (b) (6)