



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare  
Rockledge One, Suite 360  
6705 Rockledge Drive - MSC 7982  
Bethesda, Maryland 20892-7982  
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  
Facsimile: (301) 402-7065

March 16, 2018

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

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 March 14, 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 February 6, 2018. According to the information provided, OLAW understands that an individual was cleaning salt water fish tanks and interacting with the animals but had not completed formal training.

The corrective actions consisted of having the individual stop the animal activity until training was completed. The training was successfully completed and the individual resumed the activities with the fish.

Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate, correct, and prevent recurrence of the noncompliance. Your prompt and thorough resolution of this matter is commendable and consistent with the PHS Policy philosophy of monitored self-regulation. 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



March 14, 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 an individual was interacting with vertebrate animals (fish) without completing the training required by our Assurance. This occurred with animals approved by the IACUC, "Van Kley Museum Animal Presentations," approval number 011801.

On February 2, 2018, it came to the attention of the IACUC Chair, Susan M. Fraley, DVM, that (b) (6) a Hope College Business Services employee, had been cleaning our salt water tanks without having gone through the IACUC required training. While (b) (6) has extensive experience with maintaining salt water tanks and the animals therein, because he had not undergone the formal IACUC approved training, this was a situation of noncompliance. That day Dr. Fraley contacted the Primary Investigator (PI) of record for this protocol Lori Hertel as well the (b) (6) about this oversight. On February 6, Dr. Fraley had a phone conversation with you about the situation during which you suggested that this was a reportable noncompliance issue because (b) (6) was having contact with the inside of the salt water tanks. Also on February 6 Dr. Fraley informed the Institutional Officer (IO) Dr. William Polik of the noncompliance and the plan to correct it.

The following corrective action plan was implemented after the incident:

1. On February 2, The Chair of the IACUC Dr. Fraley informed the (b) (6) and the PI for this protocol Lori Hertel that (b) (6) would need to undergo the required training, and could not interact with any campus animals until that training had been completed.
2. Ms. Hertel and (b) (6) emailed the Chair Dr. Fraley that day and February 5 (respectively) that they recognized this oversight was a noncompliance matter and would correct it immediately.
3. On February 6, Dr. Fraley called the OLAW Division of Compliance to report the matter.
4. On February 6, Dr. Fraley informed the IO Dr. Polik about the matter.
5. On February 6, Dr. Fraley informed (b) (6) that he would need to go through the requisite training prior to working with animals again.
6. (b) (6) responded that day with his willingness to comply.
7. On February 13, (b) (6) completed the training required by the IACUC.

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 have confirmed that there are no other individuals who interact with vertebrates who have not completed the required training.

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

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

**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, March 16, 2018 8:03 AM  
**To:** Susan Fraley; OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Noncompliance Self-Report

Thank you for the updated letter. The previous one will be shredded. Unfortunately I'll be traveling on business.

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:** Susan Fraley [mailto:fraleys@hope.edu]  
**Sent:** Friday, March 16, 2018 7:57 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** Re: Noncompliance Self-Report

OK, here is the most recent letter, so the first one can be trashed. Again, thanks for your understanding. Dr. Morse, I hope you are out of the office for something fun!  
 Thanks, everyone,  
 Susan Fraley DVM

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 Fri, Mar 16, 2018 at 7:33 AM, OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov> wrote:

Thank you very much for the kind words. We try hard to be as user friendly as the Federal Gov't can be. Please feel free to wait until next week to send the document. I will be out of the office most of the week but Ms. Ward will monitor the inbox and I'll alert her to your updated letter.

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:** Susan Fraley [mailto:[fraleys@hope.edu](mailto:fraleys@hope.edu)]

**Sent:** Thursday, March 15, 2018 7:14 PM

**To:** OLAW Division of Compliance Oversight (NIH/OD) <[olawdco@od.nih.gov](mailto:olawdco@od.nih.gov)>

**Subject:** Re: Noncompliance Self-Report

Thanks so very much!! My IO has signed it but I need to get it scanned. I'm not on campus tomorrow but I'll try to make it happen. I really appreciate how helpful you all are! I'm a relatively new chair and assumed (WRONGLY!!!) that any interaction with OLAW would be scary. Not so!! Have a nice evening.

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)

On Thu, Mar 15, 2018 at 2:51 PM, OLAW Division of Compliance Oversight (NIH/OD)  
<[olawdco@od.nih.gov](mailto:olawdco@od.nih.gov)> wrote:

Not a problem. Happened to me last week! I still have your previous letter as a place-holder, so go ahead and send the final version when ready and I'll shred the previous one.

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:** Susan Fraley [<mailto:fraleys@hope.edu>]

**Sent:** Thursday, March 15, 2018 2:32 PM

**To:** OLAW Division of Compliance Oversight (NIH/OD) <[olawdco@od.nih.gov](mailto:olawdco@od.nih.gov)>

**Subject:** Re: Noncompliance Self-Report

Well Dr. Morse, this is embarrassing!!! I did not send the final version of the letter. There were just a few styling changes so nothing substantive but is it too late to ignore that one and allow me to send another?

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 Thu, Mar 15, 2018 at 2:28 PM, OLAW Division of Compliance Oversight (NIH/OD) <[olawdco@od.nih.gov](mailto:olawdco@od.nih.gov)> wrote:

Hello Dr. Fraley,

Thank you for this report. We will review it and send an official response to the I.O. and the IACUC contact soon. We will contact you if we have any questions. We are pleased that you found the sample letters helpful!

Sincerely, 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:** Susan Fraley [<mailto:fraleys@hope.edu>]

**Sent:** Thursday, March 15, 2018 2:23 PM

**To:** OLAW Division of Compliance Oversight (NIH/OD) <[olawdco@od.nih.gov](mailto:olawdco@od.nih.gov)>

**Subject:** Noncompliance Self-Report

Please let me know if this report is missing anything - this is the first time I have had to write such a letter. I really appreciate the sample letters - thank you!

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: awDate: 2/6/18Time: 2:00Name of Person reporting: Suzanne FrableyTelephone #: (b) (6)

Fax #:

Email:

Name of Institution: Hope CollegeAssurance number: A3971Did incident involve PHS funded activity? \_\_\_\_\_Funding component: \_\_\_\_\_Was funding component contacted (if necessary): \_\_\_\_\_

What happened?

Person working with fish, cleaning tanks but not trained.Species involved: Fish

Personnel involved:

Dates and times:

Animal deaths:

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

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY

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