



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

January 6, 2020

Re: Animal Welfare Assurance
A3079-01 [OLAW Case 3V]

Dr. Dawn A. Bonnell
Vice Provost for Research
University of Pennsylvania
1 College Hall, (b) (4)
Philadelphia, PA 19104-6303

Dear Dr. Bonnell,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your December 18, 2019 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of Pennsylvania. According to the information provided, OLAW understands that twelve rats failed to receive post-procedure analgesics as stated in the protocol. No adverse effects were noted with the rats due to not receiving the drug.

The corrective actions consisted of counseling the Principal Investigator (PI) and staff which immediately starting using the proper analgesics. The PI will use the institutional template for surgical and post-operative care records. The laboratory was placed on enhanced post-approval monitoring.

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.

Sincerely,

(b) (6)

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

cc: IACUC Chair
Director of Animal Welfare



Office of the Vice Provost for Research

December 18, 2019

Brent Morse, DVM, DACLAM
Director of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health
RKL 1, Suite 360, MSC 7982
6705 Rockledge Drive
Bethesda, MD 20892-7982

University of Pennsylvania
A3079-01

Dear Dr. Morse,

During a routine Post Approval Monitoring (PAM) review of a protocol, it was discovered that twelve rats did not received the post-procedure analgesics as described in the IACUC approved protocol. The clinical veterinarian did not note any post procedure complications with the animals. The compliance liaison staff reviewed the issue with the PI and the laboratory staff immediately started using the proper analgesics. Additionally, the PI adopted the IACUC suggested template for surgical and post-operative care records. The IACUC Compliance committee reviewed the occurrence and the IACUC was informed at regularly scheduled meeting. The laboratory will have follow-up PAM review in the near future. The study was funded by 4459-RA-MRI-SPECT.

Sincerely yours,

(b) (6)

Dawn Bonnell, PhD
Vice Provost for Research
Trustee Professor of Materials Science and Engineering
Institutional Official

CC: IACUC Chair, University of Pennsylvania
Attending Veterinarian and ULAR Director, University of Pennsylvania
Director of Animal Welfare, University of Pennsylvania

Morse, Brent (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Monday, December 23, 2019 9:06 AM
To: Reinhard, Gregory R; OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Non Compliance report

Thank you for providing this final report Dr. Reinhard. We will send an official response soon.

Best regards, Brent Morse

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

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From: Reinhard, Gregory R [mailto:reingr@upenn.edu]
Sent: Friday, December 20, 2019 1:27 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Subject: Non Compliance report

Attached please find a non-compliance report.

Please contact me if you have any questions.

Regards
Greg

Gregory R. Reinhard, MBA, DVM, DACLAM, CPIA
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