



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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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  
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November 27, 2018

Re: Animal Welfare Assurance  
A3049-01 [OLAW Case 1P]

Mr. Thomas Coggins  
Director, Office of Research Compliance  
University of South Carolina  
(b) (4) Byrnes Building  
Columbia, SC 29208

Dear Mr. Coggins,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your November 14, 2018 email reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of South Carolina. According to the information provided, OLAW understands that on October 31, 2018 your IACUC was notified that some or all animals were not being anesthetized for retro-orbital blood collection as described in the Animal Use Protocol (AUP). It was subsequently determined that a bell jar had been used to administer isoflurane in the animal room although the room did not have a fume hood. It was not stated if the animals were supported by PHS/NSF funding.

Corrective actions included the IACUC Chair directing that all retro-orbital blood collection by lab staff be discontinued immediately and the responsible senior student be barred from animal work. The IACUC subsequently suspended the senior student from performing animal work until she and all lab personnel are properly trained in retro-orbital blood collection. The training was completed as of November 7<sup>th</sup> and the senior student regained facility access as of November 12, 2018.

The prompt consideration of this matter by the University of South Carolina was consistent with the philosophy of institutional self-regulation. Similarly, the additional actions taken to resolve the issue and prevent recurrence were appropriate. For all future reports please remember to include the animal species and whether or not the work was supported by the PHS or NSF. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

(b) (6)

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

cc: IACUC Contact

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Wednesday, November 14, 2018 4:19 PM  
**To:** COGGINS, TOMMY; OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** [REDACTED] (b) (6)  
**Subject:** RE: Report of Non-Compliance - A3049 (D16-00028)

Thank you for providing this report. 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:** COGGINS, TOMMY [mailto:TCOGGINS@mailbox.sc.edu]  
**Sent:** Wednesday, November 14, 2018 1:38 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** [REDACTED] (b) (6)  
**Subject:** Report of Non-Compliance - A3049 (D16-00028)

VIA EMAIL: [olawdco@mail.nih.gov](mailto:olawdco@mail.nih.gov)

November 14, 2018

Brent Morse, DVM  
 Director, Division 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

Dear Dr. Morse:

The University of South Carolina, in accordance with Assurance D16-00028 and PHS Policy IV.F.3., provides this report regarding a recent case of non-compliance. An anonymous complaint to the IACUC on October 31, 2018 suggested that some or all animals involved in experiments under an approved Animal Use Protocol were not being anesthetized for retro-orbital blood collection as described in the AUP. The IACUC Chair directed that all retro-orbital blood collection by lab staff be discontinued immediately; that the person responsible for doing the procedure be barred from any further animal work; and that records of retro-orbital blood collections be forwarded to the IACUC for review and discussion at the November meeting. The PI complied immediately.

During the investigation, it came to light that a bell jar was being used, at least occasionally, to administer isoflurane in the animal room. This was also not approved in the protocol, and posed a health risk to animals and personnel because there is no fume hood in the room.

The IACUC discussed the reports and records at its meeting on November 1, 2018. The findings were:

1. Withholding anesthetic for the retro-orbital blood collection is not approved and will not be approved by the IACUC.
2. The use of a bell jar for isoflurane administration is not approved and is not allowed in an animal room where no fume hoods are present.

The IACUC suspended the senior student in the lab, who is responsible for retro-orbital blood collection, from performing any animal work until she and all lab personnel are properly trained in performing retro-orbital blood collection. Training will be conducted by university veterinary staff. The suspension is for a minimum of one week, or until the student and lab personnel are retrained. All lab personnel completed retraining as of November 7, 2018; the senior student regained facility access on November 12, 2018.

The University of South Carolina is committed to protecting the welfare of animals used in research and appreciates the guidance and assistance provided by OLAW in this regard. Should you have any questions concerning this report, please do not hesitate to contact me.

Sincerely,

Thomas Coggins  
Institutional Official  
Director, Office Research Compliance  
University of South Carolina  
(b) (6)  
[tcoggins@mailbox.sc.edu](mailto:tcoggins@mailbox.sc.edu)