



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  
Facsimile: (301) 402-7065

July 23, 2018

Re: Animal Welfare Assurance  
A3049-01 [OLAW Case 10]

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 July 19, 2018 email reporting an instance of noncompliance with the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals (Policy) at the University of South Carolina. According to the information provided, OLAW understands that on July 10, 2018, a veterinary technician discovered that a surgical procedure that was only approved for rats in the IACUC protocol was performed on five mice. The email indicated that the animal activities were not PHS funded.

The corrective actions included notifying the PI who had thought that the protocol included both species. It was stated that no further surgical procedures would be performed on the PI's mice until a protocol amendment was approved by the IACUC. OLAW assumes that this will be carried out as stated. Additionally, your email indicated that this incident was discovered when the veterinary technician was responding to the lab who reported that three mice removed their sutures. It was noted that the attending veterinarian and veterinary technician repaired the open wounds, but the email did not mention whether or not there was any indication that the surgical procedure had been performed improperly by the lab. OLAW assumes that either there was insufficient information to make this determination or an assessment regarding appropriate surgical technique, training, and experience was made to rule out the potential that the sutures were improperly placed. Please inform our office if either of the listed assumptions are not accurate.

OLAW commends the University of South Carolina for prompt consideration of this matter and concurs with the corrective actions to address this incident of noncompliance. Although the involved animal activity was not PHS funded, the application of the standards of the PHS Policy across the animal care and use program reduces any potential appearance of a double standard. We appreciate being informed of these matters and find no cause for further action by this Office.

Sincerely,

(b) (6)

Jane Na, DVM  
Veterinary Medical Officer  
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:** Friday, July 20, 2018 8:46 AM  
**To:** COGGINS, TOMMY; OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** (b) (6) (b) (6) (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:** Thursday, July 19, 2018 5:01 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** (b) (6)@uscmmed.sc.edu; (b) (6)@mailbox.sc.edu; (b) (6)@mailbox.sc.edu  
**Subject:** Report of Non-Compliance - A3049 (D16-00028)

July 18, 2018

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

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. The non-compliance did not occur on a Federally funded grant.

On Tuesday, July 10, 2018, a research technician contacted the USC Department of Laboratory Animal Resources (DLAR) concerning three mice who had removed their own sutures postoperatively. A DLAR Veterinary Technician examined the animals and suggested that wound clips be used to repair the open wounds, and that wound clips be used to close the skin in future surgeries. The DLAR Veterinary Technician reviewed the Animal Use Protocol to determine if an amendment is required to use wound clips for future surgeries. Upon reviewing the AUP, she discovered that the approved surgical procedure was for rats, not mice.

The PI was notified, and she indicated that the surgical procedure is identical for both rats and mice, and she believed that both species were covered in her AUP. The surgery had been performed on five mice before this oversight was discovered. No additional surgical procedures will be performed on mice until an appropriate amendment is approved. The Attending Veterinarian and Veterinary Technician repaired the open wounds on the three mice that had removed their sutures.

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.

Thomas Coggins  
Director  
Office of Sponsored Awards Management & Research Compliance  
University of South Carolina  
(b) (6)  
[tcoggins@mailbox.sc.edu](mailto:tcoggins@mailbox.sc.edu)