



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

July 17, 2019

Re: Animal Welfare Assurance  
A3368-01 [OLAW Case 9M]

Dr. Nadine Connor  
Associate Vice Chancellor  
for Research Policy and Compliance  
University of Wisconsin-Madison  
(b) (4) Bascom Hall – 500 Lincoln Drive  
Madison, WI 53706

Dear Dr. Connor,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your July 16, 2019 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of Wisconsin- Madison, following up on an initial telephone report on June 26, 2019. According to the information provided, OLAW understands that five infant rhesus monkeys were subjected to behavioral tests at a different frequency than described in the approved protocol. The tests involved removing the infants from the mothers for one hour and conducting the testing. Conducting the tests three in a row rather than once per month resulted in better outcomes.

The corrective action consisted of amending the protocol to reflect the actual testing schedule.

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: LSVC ACUC Chair  
Janet Welter, D.V.M., Attending Veterinarian



July 16, 2019

Dr. Brent Morse, DVM, DACLAM  
Acting Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
RKL1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, MD 20892-7892

Dear Dr. Morse:

The University of Wisconsin-Madison, in accordance with Assurance A3368-01 and PHS Policy IV.F.3, provides this report of two incidents first reported to you via telephone by Dr. Janet Welter on June 26, 2019.

- 1) In the first incident, a veterinary technician inadvertently administered the incorrect dose of an anti-inflammatory (meloxicam) to an infant rhesus macaque after identification tattoos were placed on its ears. A dose of gastric protectant was administered prophylactically to alleviate any adverse effects resulting from the incorrect anti-inflammatory dose. The animal was monitored and no adverse effects were noted. The technician has not been involved in similar incidents and underwent retraining. The animal involved was supported by NIH grant 5P51OD011106-57.
- 2) In the second incident, following a post-approval monitoring review, a PI self-reported that 5 rhesus macaque infants underwent a behavioral assessment procedure at a different frequency than outlined in the approved IACUC protocol. This "infant behavior assessment" involves removal of the infant monkey from its mother for no longer than 1 hour. In the procedure, the infant is put in a separate enclosure where its cognitive, regulation, motor and sensory responses are scored. The PI reported that these infant behavior assessments have been performed daily for 3 days in a row once a month, instead of once weekly as the protocol specifies. It was discovered that the infants acclimate to the assessments more quickly if three days of testing in a row is performed rather than weekly testing. A protocol amendment to alter the frequency of testing is being processed. The animals involved were supported by NIH grant 3R01AI116382-01A1S1.

The LSVC ACUC discussed these incidents in full committee and considered the corrective steps taken appropriate. If you have further questions, please feel free to contact either of us or Dr. Janet Welter.

Sincerely,

(b) (6)

Ricki Colman, Ph.D.

**Research Animal Resources Center**

Chair, LSVC ACUC

(b) (6)

Nadine P. Connor, Ph.D.  
Associate Vice Chancellor for Research Policy & Compliance  
Institutional Official

xc:

(b) (6)

Janet Welter  
AAALAC-I

## Wolff, Axel (NIH/OD) [E]

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Tuesday, July 16, 2019 2:14 PM  
**To:** (b) (6) OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** Nadine Connor; (b) (6) Janet Welter; RICKI J COLMAN  
**Subject:** RE: Incident Report from Nadine Connor @ UW-Madison

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:** (b) (6)  
**Sent:** Tuesday, July 16, 2019 12:00 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** accredit@AAALAC.org; Nadine Connor <nadine.connor@wisc.edu>; (b) (6)  
(b) (6) Janet Welter <welter@rarc.wisc.edu>; RICKI J COLMAN <rjcolman@wisc.edu>  
**Subject:** Incident Report from Nadine Connor @ UW-Madison

Dr. Morse:

Please see the attached incident final report from Nadine Connor @ UW-Madison. Thanks!

(b) (6)





## Initial Report of Noncompliance

By: aw

Date: 6/26/19

Time: 9:15

Name of Person reporting: Janet Welter

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: U of Wisconsin - Madison

Assurance number: A3368

Did incident involve PHS funded activity? Yes

Funding component: \_\_\_\_\_

Was funding component contacted (if necessary): \_\_\_\_\_

What happened?

Subjects underwent different behavioral assessment than described in protocol

Species involved: Infant Rhesus

Personnel involved:

Dates and times:

Animal deaths:

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

Amend protocol

Projected submission to OLAW of final report from Institutional Official:

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