



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

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Office of Laboratory Animal Welfare  
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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) 480-3387

June 19, 2020

Re: Animal Welfare Assurance  
#A3245-01 (OLAW Case 3Y)

Dr. Melur K. Ramasubramanian  
Vice President for Research  
Professor, Mechanical Engineering  
University of Virginia  
Box 400301  
Charlottesville VA 22904-4301

Dear Dr. Ramasubramanian,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your June 18, 2020 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of Virginia, following up on an initial report on April 16, 2020. According to the information provided, OLAW understands that four live mice were found among carcasses in a procedure room due to a failure to ensure death by a secondary physical method following exposure to CO2 for euthanasia.

The immediate action taken upon discovery consisted of appropriately euthanizing the mice. The individual responsible could not be identified therefore all investigators housing mice in the vivarium were retrained. The investigators and animal handlers were retrained on appropriate methods of euthanasia and on confirming death. The training was documented.

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. Please remember, as Institutional Official, to sign all final reports of noncompliance to this Office. Thank you for keeping OLAW apprised on this matter.

Sincerely,

(b) (6)

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

cc: IACUC Chair

A3245-

**University of Virginia**  
**Animal Welfare Compliance Report**  
**PHS Assurance # A3245-01**

A preliminary email notification was sent to the OLAW Division of Compliance Oversight by Angela Gamble, Director of the Office of Animal Welfare. Dr. Axel Wolff acknowledged receipt. It was understood that a full report would follow IACUC investigation. This document is a summary of the incident, actions taken, and final resolution.

**UVA Compliance Case #: 2020-E**

<b>Nature of Incident(s):</b>	Failure to ensure death of animals after euthanasia procedures (mice)
<b>Summary of Incident:</b>	The husbandry staff discovered that a researcher failed to ensure the death of four animals following CO <sub>2</sub> euthanasia. The four alive animals were found with other mouse carcasses in a procedure room used for CO <sub>2</sub> euthanasia. The four animals were immediately euthanized by the husbandry staff.
<b>Action taken by IACUC:</b>	<p>At the next convened monthly meeting, the IACUC reviewed the information gathered by the Office of Animal Welfare which determined that the laboratory responsible for the event could not be identified with absolute certainty. Due to the significant impact on animal welfare, the IACUC mandated retraining for all researchers housing mice in the specific vivaria at the time of the incident.</p> <p>Thirty two researchers (PIs) were provided a training document describing the accepted methodologies for performing a secondary physical method for confirming death in mice that have been euthanized following CO<sub>2</sub> inhalation or anesthetic overdose. Each PI received individualized training documents containing a list of animal handlers requiring retraining. Additionally, the IACUC policy on euthanasia, confirmation of death, and carcass disposal was provided and included for retraining. Upon retraining completion, each PI was asked to resubmit the training document indicating which animal handlers were retrained and signify completion with their own signature.</p> <p>All of the PIs submitted the signed documentation as required.</p>
<b>Decision/Resolution:</b>	The IACUC felt that no further action was deemed necessary and considered the incident resolved.
<b>Federal Funding:</b>	This was considered to be an isolated issue but had the potential for affecting funded research animals.
<b>Notification of Final Disposition:</b>	<input checked="" type="checkbox"/> IO <input checked="" type="checkbox"/> OLAW

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, June 19, 2020 7:01 AM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: UVA OLAW Compliance Report 2020-E

Thank you for this report, (b) (6) We will send a response soon.

Axel Wolff

**From:** (b) (6)  
**Sent:** Thursday, June 18, 2020 8:45 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>; Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>  
**Cc:** Ramasubramanian, Melur K (mkr5a) <mkr5a@virginia.edu>; (b) (6) Gamble, Angela (adr8s) <adr8s@virginia.edu>  
**Subject:** UVA OLAW Compliance Report 2020-E

Dr. Axel Wolff, Director of Compliance Oversight Office of Laboratory Animal Welfare National Institutes of Health RKL 1,  
Suite 360, MSC 7982  
6705 Rockledge Dr., Bethesda, MD

Dr. Wolff:

I attach a compliance report from our IACUC. These is our case 2020=E.

In this case, the IACUC has investigated thoroughly, taken appropriate action and the committee has determined that this matter are now resolved to their satisfaction.

I have reviewed the report and I concur with the committee responses and final determinations.

Regards,

(b) (6)

For Melur K. Ramasubramanian

(b) (6)

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, April 17, 2020 7:27 AM  
**To:** Gamble, Angela (adr8s)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: preliminary notification - UVA (Assurance A3245-01): 2020-E

Thank you for this preliminary report, Ms. Gamble. We will start a new case file and look forward to receiving the final report from the IO after the IACUC has completed its investigation.

Axel Wolff, M.S., D.V.M.  
 Deputy Director, OLAW

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**From:** Gamble, Angela (adr8s) <adr8s@virginia.edu>  
**Sent:** Thursday, April 16, 2020 3:45 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Gamble, Angela (adr8s) <adr8s@virginia.edu>; (b) (6)  
**Subject:** preliminary notification - UVA (Assurance A3245-01): 2020-E

Dear OLAW Division of Compliance Oversight,

This is to provide preliminary notification that the University of Virginia IACUC (PHS Assurance #A3245-01) has identified a significant deficiency. The UVA tracking number is 2020-E. The issue is under investigation and review by the IACUC. Specifically, an individual failed to ensure death after performing CO<sub>2</sub> euthanasia in mice. We are working towards resolution and will send a complete report once the issue has been resolved.

Should you have any questions or concerns prior to receiving our final report, please do not hesitate to contact me.

Sincerely,  
 Angela Gamble

*Angela Gamble*  
*University of Virginia*  
*Director, Office of Animal Welfare*  
*Charlottesville, VA 22908*  
 PH: (b) (6)