



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) 480-3387

November 18, 2020

Dear Mr. Hershler,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of the allegation against University of Houston's College of Optometry in reference to activities performed under NIH grant R01EY026568. This case was referred to OLAW for investigation from Chief Grant Management Officer of the National Eye Institute-NIH. Specifically, the following concerns were raised to the organization in reference to the information you provided:

- Allegation of possible inadequate analgesia of non-human primates undergoing study.
- Potential conflict of interest as the Principal Investigator on the aforementioned grant also serves on the IACUC.

An investigation was conducted and the following was determined:

- Consideration of the approved protocol which revealed that no research-related restrictions related to providing pain relief to animals occurred and all veterinary recommendations are followed. The veterinary team monitors animal subjects during the surgical and post-recovery period and works with the research team to monitor animals for any pain or discomfort.
- Assessment of medical records revealed that all peri-operative analgesic doses for animals were reviewed by the fully convened IACUC including accuracy of data collection verification by two veterinarians independently.
- Comparison of anesthetics chosen to accepted formularies including type, dose and timing of analgesics used including consideration of extended pain-relieving benefits of some medications, in which IACUC concluded that all primates participating in the research received appropriate level of analgesia.
- Conflict of interest investigation revealed that the principal investigator was not present for the vote on any submission related to the protocol and conflict of interest was not a concern during the review.

No evidence was found in support of the other allegations following a formal investigation by the institution. Based on the information provided, OLAW is satisfied that appropriate steps have been taken to investigate this allegation and that University of Houston's College of Optometry is in compliance with PHS policy. We thank you for your interest in animal welfare and hereby close this investigation.

Sincerely,

Nicole L. Lukovsky-
akhsanov -S

Digitally signed by Nicole
L. Lukovsky-akhsanov -S
Date: 2020.11.18
17:13:35 -05'00'

Nicole Lukovsky-Akhsanov, DVM, MPH, DACLAM
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: Robert M. Gibbens, DVM, Director, Animal Welfare Operations, USDA- APHIS-AC
Karen Robinson Smith, Chief, Grants Management NEI