



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

May 12, 2020

Re: Animal Welfare Assurance
#A3596-01 (OLAW Case 3U)

Dr. Harry Orf
Senior Vice President for Research
Massachusetts General Hospital
(b) (4) 55 Fruit Street
Boston, MA 02114

Dear Dr. Orf,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your May 1, 2020 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Massachusetts General Hospital. According to the information provided, OLAW understands that on November 26, 2019 an incident was identified wherein a student had anesthetized and then recovered 80 tadpoles per protocol before the student was approved by the IACUC to work with animals on the protocol. It was noted that several animals had died while in the recovery water, possibly due to improper dechlorination of the water by the system. This issue was resolved. Also, animals had been kept in the laboratory overnight, in excess of the 12-hour limit. It was stated that the animal activity was supported by the PHS.

Corrective actions included amending the protocol to add the student to the protocol study staff, and the student completed the required facility training. The protocol was amended to change the euthanasia method to immersion in buffered tricaine and protocol staff were trained to use this method. The PI and facility manager identified a way to accommodate tadpoles in the vivarium during the overnight recovery period that meets experimental needs, thus eliminating the need for animals to be housed in the laboratory overnight. IACUC compliance confirmed animals are being housed in the approved housing room in Comparative Medicine since this incident, and Comparative Medicine will inform the IACUC if there are future concerns of animal deaths. It is further understood that the institution will ensure that applicable costs paid from the NIH grant will be removed, and the relevant agencies will be notified.

OLAW believes that the corrective measures put in place by the Massachusetts General Hospital are consistent with the provisions of the PHS Policy on Humane Care and Use of Laboratory Animals regarding the philosophy of institutional self-assessment, self-reporting and self-regulation. We appreciate being informed of this matter and find no cause for further action by this office at this time.

Sincerely,

Brent C. Morse -S

Digitally signed by Brent C.
Morse -S
Date: 2020.05.12 11:30:47 -04'00'

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

cc: IACUC contact

A3596-34



MASSACHUSETTS
GENERAL HOSPITAL
RESEARCH INSTITUTE



HARVARD
MEDICAL SCHOOL

55 Fruit Street, Bul240E
Boston, MA 02114
Phone: 617-724-9079
Fax: 617-724-3307
Email: horf@mgm.harvard.edu

Harry W. Orf, PhD
Senior Vice President for Research
Massachusetts General Hospital
Principal Associate in Genetics
Harvard Medical School

May 1, 2020

Brent Morse, DVM
Acting Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health
Rockledge 1, Room 3615, MSC 7982
6705 Rockledge Drive
Bethesda, MD 20892-7982

Subject: Serious Noncompliance with PHS Policy
Institution: The Massachusetts General Hospital
Animal Welfare Assurance #: D16-00361 (A3596-01)
NIH Grant: 5P01GM058448-20

Dear Dr. Morse:

This letter is to provide you with a full explanation of the circumstances and actions taken by the Massachusetts General Hospital (MGH) Institutional Animal Care and Use Committee (IACUC) as required by Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy) Section IV.F.3 following an incident that occurred. The incident was determined by the IACUC to constitute serious noncompliance with PHS Policy and is therefore reportable.

The incident was identified on November 26 and involved 80 tadpoles that were on a protocol investigating toxicity, anesthetic potency, and reversibility of novel anesthetic agents. The animals are recovered from anesthesia in oxygenated water overnight. The Principal Investigator (PI) submitted a report to the IACUC that a student conducted two experiments prior to being approved to work on the protocol. MGH policy requires all research staff be added to the protocol by amendment; in this case the amendment had been submitted but approval not finalized due to a pending occupational health clearance. The PI instructed the student to stop work until the incident was discussed with the IACUC.

The PI met with the IACUC compliance officer and the facility veterinarian on December 20 to review the incident. Comparative Medicine is contracted to euthanize the animals for the laboratory and noted there were several animal deaths prior to euthanasia. The PI determined this was due to a failure of the water dechlorination system used as a source of water for recovery, which was resolved by the time of the meeting. The investigation revealed that the animals were recovered overnight in the laboratory. MGH policy limits laboratory housing to 12 hours. The veterinarian also recommended the PI use buffered

tricaine as a euthanasia method for the laboratory, which is the method used by the comparative medicine group. A compliance subcommittee of the IACUC reviewed the event on February 6 and the convened IACUC reviewed the event at its monthly meeting on February 19. The PI took full responsibility for the incident and worked with the IACUC compliance officer to develop a corrective action plan to prevent a recurrence of this event.

The IACUC approved the following corrective actions:

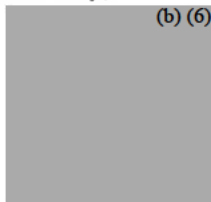
- The protocol was amended to add the student to the protocol study staff, and the student completed the required facility training.
- The protocol was amended to change the euthanasia method to immersion in buffered tricaine and protocol staff were trained to use this method.
- The PI and facility manager identified a way to accommodate tadpoles in the vivarium during the overnight recovery period that meets experimental needs, thus eliminating the need for animals to be housed in the laboratory overnight.
- IACUC compliance confirmed animals are being housed in the approved housing room in Comparative Medicine since this incident, and Comparative Medicine will inform the IACUC if there are future concerns of animal deaths.

The institution will ensure that applicable costs paid from the NIH grant will be removed, and the relevant agencies will be notified, as appropriate.

The Massachusetts General Hospital 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 regarding this report, please contact me at your convenience.

Sincerely,

(b) (6)



Harry W. Orf, PhD
Senior Vice President for Research
Institutional Official
The Massachusetts General Hospital

cc: W. Zapol MD, Chair, Institutional Animal Care and Use Committee
cc: A. Clancy PhD, Director, Animal Welfare Assurance
cc: D. Jarrell DVM, Attending Veterinarian and Director, Center for Comparative Medicine
cc: (b) (6)

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Monday, May 4, 2020 7:38 AM
To: Clancy, Anne
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Report of Serious Noncompliance with PHS Policy_Massachusetts General Hospital_AWA # D16-00361 (A3596-01)

Thank you for this report, Dr. Clancy. We will respond soon.
Axel Wolff

From: Clancy, Anne <ACLANCY1@mgh.harvard.edu>
Sent: Friday, May 1, 2020 11:34 AM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Orf, Harry W., Ph.D. <HORF@mgh.harvard.edu>; Jarrell, Donna M. <DJARRELL@mgh.harvard.edu>
Subject: Report of Serious Noncompliance with PHS Policy_Massachusetts General Hospital_AWA # D16-00361 (A3596-01)

Dear Dr. Morse,
Please find attached a report submitted on behalf of Dr. Harry Orf, Senior Vice President for Research and Institutional Official, The Massachusetts General Hospital, in accordance with PHS Policy IV.F.3.

Please let me know if you have any questions or require additional information.

Kind regards,
Anne Clancy

Anne Clancy, PhD | Director, Animal Welfare Assurance
Phone: (b) (6)
Fax: (b) (6)
aclancy1@mgh.harvard.edu

For 24/7 assistance with critical research matters, call 617-726-HOW2 (4692)

Have an idea or a suggestion on how we can improve? Please submit a suggestion to Isuggest !
Isuggest ?

The information in this e-mail is intended only for the person to whom it is addressed. If you believe this e-mail was sent to you in error and the e-mail contains patient information, please contact the Partners Compliance HelpLine at <http://www.partners.org/complianceline> . If the e-mail was sent to you in error but does not contain patient information, please contact the sender and properly dispose of the e-mail.