



DEPARTMENT OF HEALTH & HUMAN SERVICES

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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 21, 2020

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

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 12, 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 following cardiac arrest and CPR, a protocol calls for mice to be monitored continuously until fully recovered from anesthesia, then every 4-6 hours until able to access food and water. In two experiments involving a total of two mice (November 28 and December 9), the animals were found moribund by the facility staff and were euthanized at the direction of the facility veterinarian. The PI immediately put the protocol on hold. The IACUC compliance officer met with the PI, the fellow, and the facility veterinarian on February 13 to review the event. A record review determined that the animals were provided post-operative analgesia in accordance with the approved protocol but the intensive monitoring plan did not continue beyond the day of the surgery as required. The investigation also determined the post-procedural care and monitoring was not documented fully cage-side, as required by MGH policy. It was stated that the animal activity was not supported by PHS/NSF or NASA funds.

Corrective and preventive actions included the following: retraining of all members of the research team by the facility veterinarian on appropriate monitoring for this model and the criteria that must be met before intensive monitoring can be discontinued; inclusion of all members of the team in post-procedural care, with a schedule posted prior to experiments starting, to ensure sufficient coverage for appropriate monitoring of the animals in accordance with the approved protocol; all members of the research team will be retrained in the proper use of rodent record cards and other CCM cards; documentation from the next 3 experiments will be provided to the IACUC compliance officer for review.

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. Although this activity was not PHS funded, the application of the expectations of the PHS Policy across the animal care and use program reduces any potential appearance of a double standard. 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: 2020.05.21 15:46:18 -04'00'

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

cc: IACUC contact



MASSACHUSETTS
GENERAL HOSPITAL
RESEARCH INSTITUTE



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

May 12, 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)

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 involved a protocol investigating the protective role of inhaled nitric oxide or infused sedative or analgesic agents on post-cardiac arrest/CPR outcomes. Following cardiac arrest and CPR, the protocol calls for mice to be monitored continuously until fully recovered from anesthesia, then every 4-6 hours until able to access food and water. In two experiments involving a total of two mice (November 28 and December 9), the animals were found moribund by the facility staff and were euthanized at the direction of the facility veterinarian. The PI immediately put the protocol on hold. The IACUC compliance officer met with the PI, the fellow, and the facility veterinarian on February 13 to review the event. A record review determined that the animals were provided post-operative analgesia in accordance with the approved protocol but the intensive monitoring plan did not continue beyond the day of the surgery and should have. The investigation also determined the post-procedural care and monitoring was not documented fully cage-side, as required by MGH policy.

A compliance subcommittee of the IACUC reviewed the event on March 5 and the convened IACUC reviewed the event at its monthly meeting on March 18. 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:

Retraining of all members of the research team by the facility veterinarian on appropriate monitoring for this model and the criteria that must be met before intensive monitoring can be discontinued. Inclusion of all members of the team in post-procedural care, with a schedule

Brent Morse, DVM Ltr.
May 12, 2020

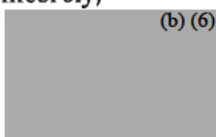
posted prior to experiments starting, to ensure sufficient coverage for appropriate monitoring of the animals in accordance with the approved protocol.

- All members of the research team will be retrained in the proper use of rodent record cards and other CCM cards. The rodent record card is used as a tool to ensure, and document, compliance with the treatment and monitoring plan of the approved protocol.
- When research operations resume post-COVID-19, documentation from the next 3 experiments will be provided to the IACUC compliance officer for review.

No PHS/NSF/NASA funds were implicated in this matter.

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

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Wednesday, May 13, 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 send a response soon.

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

From: Clancy, Anne <ACLANCY1@mgh.harvard.edu>
Sent: Tuesday, May 12, 2020 10:17 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

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