



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

June 1, 2020

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

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 22, 2020 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Massachusetts General Hospital. This letter had not been preceded by a preliminary report to OLAW.

According to the information provided, this Office understands that the Massachusetts General Hospital Animal Care and Use Committee (ACUC) determined that instances of noncompliance occurred with respect to: failure to adhere to IACUC-approved protocol. The final report states that on January 28, 2020, two mice underwent surgery and were returned to the housing facility prior to full recovery from anesthesia. The researcher responsible was contacted by the veterinary technician and returned and remained with the mice until they were ambulatory. The facility veterinarian noted the mice were provided post-operative analgesics at a protracted schedule relative to that required by the approved protocol. The veterinarian worked with the fellow to ensure the animals were provided adequate analgesia per the protocol. A record review was performed and identified additional mice that had not received post-operative analgesics at the required schedule. The principal investigator (PI) was notified and immediately halted surgeries.

On February 12th the PI and laboratory manager met with the facility veterinarian and the IACUC compliance officer to review the incident. On March 5th, a compliance subcommittee of the IACUC reviewed the event, and it was discussed at the convened IACUC meeting on March 18th. The report states the PI took full responsibility for the incident and worked with the IACUC compliance officer to develop a corrective action plan to prevent recurrence. The following corrective actions were approved by the IACUC:

- The PI submitted an amendment to the protocol to modify the anesthesia and analgesia regimens, supportive care, and the post-operative recovery criteria. The amendment was approved on March 6, 2020.
- The laboratory has implemented a plan to ensure that post-procedural analgesia is administered as described in the protocol, including pre-operative planning and posting of a schedule with assigned responsibilities and contact information in the animal housing room. The laboratory manager will be responsible for ensuring that the research team members adhere to the plan.

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June 1, 2020
OLAW Case A3596-3Y

- The laboratory's activities will be monitored for 3 months (including audits of experimental documentation and spot checks of the housing facility). This oversight will occur when research operations resume post-COVID-19.

It is noted that this research is supported by PHS funds. Based on its assessment of this explanation, OLAW understands that the Massachusetts General Hospital has implemented appropriate measures to correct and prevent recurrences of these problems and is now compliant with provisions of the PHS Policy. We appreciate being informed of these matters and find no cause for further action by this Office.

Sincerely,

Jacquelyn T.
Tubbs -S

Digitally signed by
Jacquelyn T. Tubbs -S
Date: 2020.06.01 12:10:07
-04'00'

Jacquelyn T. Tubbs, DVM
Animal Welfare Program Specialist
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC Contact



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

May 22, 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 Grants: R01HL135886, R01HL146464, R01AG061034, R01HL122987

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 goal of the research study is to identify novel therapeutic approaches to treat cardiac hypertrophy. On January 28, 2 mice that underwent cardiac ischemia/reperfusion surgery were returned to the housing facility before full recovery from anesthesia, inconsistent with IACUC policy. The veterinary technician contacted the responsible researcher, who returned to the facility and remained with the mice until they were ambulatory. The facility veterinarian noted that these mice were provided post-operative analgesics at a protracted schedule relative to that required by the approved protocol (15-18 h instead of 8-12 h) and worked with the fellow to ensure the animals were provided adequate analgesia per the protocol. A record review identified additional mice (43 animals) that had not been provided with post-operative analgesics at the required schedule. The principal investigator was notified and immediately halted all surgeries.

The principal investigator and laboratory manager met with the facility veterinarian and the IACUC compliance officer on February 12 to review the incident. 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.

Brent Morse, DVM Ltr.
May 22, 2020

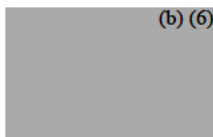
The IACUC approved the following corrective actions:

- The PI has amended the protocol to modify the anesthesia and analgesia regimens, supportive care, and the post-operative recovery criteria. The amendment was approved on 3/6/2020.
- The laboratory has implemented a plan to ensure that post-procedural analgesia is administered as described in the protocol, including preoperative planning and posting of a schedule with assigned responsibilities and contact information in the animal housing room. The laboratory manager will be responsible for ensuring that the research team members adhere to the plan.
- When research operations resume post-COVID-19, the laboratory's activities will be monitored for a period of 3 months, including audits of experimental documentation and spot checks of the housing facility.

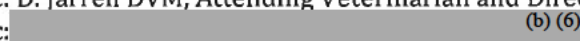
The institution will ensure that applicable costs paid from the NIH grants will be removed, and the relevant agencies will be notified, as appropriate.

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: Tuesday, May 26, 2020 7:28 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 reply soon.

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

From: Clancy, Anne <ACLANCY1@mgh.harvard.edu>
Sent: Friday, May 22, 2020 3:48 PM
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](#)

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