



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 17, 2020

Re: Animal Welfare Assurance  
#A3596-01 (OLAW Case 3Z]

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 June 8, 2020 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Massachusetts General Hospital (MGH). This letter had not been preceded by a preliminary report to OLAW.

According to the information provided, this Office understands that the MGH Animal Care and Use Committee (ACUC) determined that instances of noncompliance occurred with respect to: failure to adhere to the IACUC-approved protocol. The final report states during the IACUC semiannual facility inspection on March 2, 2020, a cage of 4 mice was found with cage side documentation indicating that the animals had undergone skin transplant surgery on February 14, 2020. This research involves study of a novel antibody to prevent graft rejection of heart, skin and pancreatic islets in a mouse model. It was determined the mice had received post-operative analgesia but not in accordance with the schedule described in the protocol. Following discovery of the matter, the IACUC compliance officer notified the Principal Investigator (PI). The approved analgesic regimen was discussed with the research staff the same day by the PI. The PI met with the IACUC compliance officer and the facility veterinarian on March 23, 2020 to review the event.

A compliance subcommittee of the IACUC reviewed the event on May 7<sup>th</sup> and the convened IACUC reviewed the matter at the monthly meeting on May 21<sup>st</sup>. The PI worked with the IACUC compliance officer to develop a corrective action plan to prevent future recurrence. The IACUC approved the following corrective actions:

- Appointment of a co-investigator on the protocol as a point of contact for the protocol, with the responsibility for ensuring the lab members adhere to the protocol and IACUC policies.
- The PI reviewed the protocol analgesia regimen and documentation requirements with laboratory members.
- The PI will schedule time at a laboratory meeting for the facility veterinarian and the IACUC Compliance Lead to provide training on rodent record card documentation requirements. This will occur when research operations resume post-COVID-19.
- The laboratory's animal research activities on the protocol will be monitored for a period of 3 months. This will occur when research operations resume post-COVID-19.

Page 2 – Dr. Orf  
June 17, 2020  
OLAW Case A3596-3Z

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: 2020.06.18  
08:57:04 -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  
RESEARCH INSTITUTE



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Phone: 617-724-9079  
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**Harry W. Orf, PhD**  
Senior Vice President for Research  
Massachusetts General Hospital  
Principal Associate in Genetics  
Harvard Medical School

June 8, 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/NSF/NASA Grants: R01AI057851

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 studying a novel antibody to prevent graft rejection of heart, skin, and pancreatic islets in a mouse model. During the IACUC semiannual facility inspection on 3/2/2020, a cage of 4 mice was found with cage side documentation indicating that the animals had undergone skin transplant surgery on 2/14/2020. The mice had been administered post-operative analgesia but not in accordance with the schedule described in the protocol. Instead of administering the analgesic twice daily, the research fellow administered a higher dose once per day. Immediately on finding this issue, the IACUC compliance officer notified the Principal Investigator (PI). The PI discussed the approved analgesic regimen with the research staff the same day. The PI met with the IACUC compliance officer and the facility veterinarian on 3/23/2020 to review the event. The IACUC Compliance Officer followed up with the research fellow by email to obtain documentation related to the incident.

A compliance subcommittee of the IACUC reviewed the event on May 7 and the convened IACUC reviewed the event at its monthly meeting on May 21. 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 PI has appointed a co-investigator on the protocol as a point of contact for the protocol, with the responsibility for ensuring that lab members adhere to the protocol and IACUC policies.

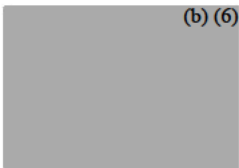
Brent Morse, DVM Ltr.  
June 8, 2020

- The PI has reviewed the protocol analgesia regimen and documentation requirements with laboratory members.
- When research operations have resumed post-COVID-19, the PI will schedule time at a laboratory meeting for the facility veterinarian and the IACUC Compliance Lead to provide training on rodent record card documentation requirements. 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 have resumed post-COVID-19, the laboratory's animal research activities on the protocol will be monitored for a period of 3 months, including review of experimental documentation and spot checks of the housing facilities.


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]

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Wednesday, June 10, 2020 7:59 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:** Monday, June 8, 2020 1:48 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)  
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[aclancy1@mgh.harvard.edu](mailto: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!](#)

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