



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

July 10, 2020

Re: Animal Welfare Assurance  
A3837-01 [OLAW Case U]

Dr. Nettie La Belle-Hamer  
Vice Chancellor for Research  
University of Alaska-Fairbanks  
2145 N. Tanana Loop, (b) (6)  
P.O. Box 757270  
Fairbanks, AK 99775-7560

Dear Dr. La Belle-Hamer,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your June 23, 2020 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of Alaska Fairbanks. Your letter supplemented information provided in a telephone report on October 22, 2019. According to the information provided, OLAW understands that in October, 2019 your institution became aware that a PI had collected 299 snowshoe hares when only 200 were approved in the protocol. The animal activity was partially funded by the NSF (DEB-1026415)

In November, 2019 the PI submitted a letter to the IACUC explaining that this was an unfortunate incident, admitted that they did not keep careful tallies of the total animals collected and took responsibility for the noncompliance. The PI assured the IACUC that an incident of this nature would not occur again.

In the November, 2019 IACUC meeting, the committee determined that this was an isolated incident and not a programmatic failure. During the meeting, the PI assured the IACUC that all research staff will from now on carefully review and adhere to approved study protocols. That they will keep an updated tally of snowshoe hare captures daily during active trapping periods.

The prompt consideration of this matter by the University of Alaska Fairbanks was consistent with the philosophy of institutional self-regulation. OLAW concurs that the incident warranted reporting. Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate this incident and prevent recurrence. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

**Brent C. Morse -S**

Digitally signed by Brent C.

Morse -S

Date: 2020.07.13 11:27:10 -04'00'

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

cc: IACUC contact  
NSF Animal Welfare Officer



A3837 - U  
Nettie La Belle-Hamer, PhD  
Interim Vice Chancellor for Research  
907-474-6167  
907-474-5993 fax  
nettie.labellehamer@alaska.edu  
research.uaf.edu

**Vice Chancellor for Research**

P.O. Box 757270, Fairbanks, Alaska 99775-7270

June 23, 2020

**Brent Morse, DVM, Director**  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
Rockledge 1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, MD 20892-7982

**Re:** Final report for a non-compliance event at the University of Alaska Fairbanks (UAF).

**Animal Welfare Assurance number:**  
D16-00482

**Applicable reporting requirement:**

The event constitutes non-compliance with an IACUC protocol. The project is funded by the National Science Foundation, United States Department of Agriculture and United States Fish and Wildlife.

**Preliminary report to OLAW:**

Via phone call to OLAW's Brent Morse on October 22, 2019.

**Incident Description:**

In October, 2019 the PI submitted a progress report which was reviewed by the IACUC. In the review, the IACUC reviewer determined that the total number of live-captured snowshoe hares exceeded the amount approved on the protocol. The research team reported they collected 299 snowshoe hares and 200 were approved in the protocol. The Alaska Department of Fish and Game permit for 2019 granted approval to live trap, mark, and release up to 200 snowshoe hares, attach radio transmitters on up to 40 of those hares, and recapture and release of up to 300 previously-marked hares.

In November, 2019 the PI submitted an explanation for the total number of live-captured snowshoe hares exceeding the approved amount. The PI indicated that in the course of the long-term study, the graduate student was researching the nutritional status of hares and how it may fluctuate throughout the year in relationship to food availability/quality, reproductive status, and other potential stressors. The study necessitated capturing hares at five stages during the year to collect blood samples, which were analyzed for distinct biomarkers. During the course of the trapping sessions the student was successful in obtaining a sufficient number of samples (approximately 30 animals/session) due to the abundance of hare populations across the Interior, which brought the project over the maximum number specified in their protocol.

The PI expressed in the letter to the IACUC that this was an unfortunate incident, admitted that they did not keep careful tallies of the total animals collected and took responsibility for the noncompliance. The PI assured the IACUC that an incident of this nature would not occur again.

**Corrective actions:**

In the November, 2019 IACUC meeting, the committee determined that this was an isolated incident and not a programmatic failure. The IACUC requested the PI provide the committee with the most recent ADF&G permit as soon as available and that the PI provide a plan to ensure the incident will not be repeated.

During the meeting, the PI assured the IACUC that all research staff will from now on carefully review and adhere to approved study protocols. That they will keep an updated tally of snowshoe hare captures daily during active trapping periods. The PI stated that they would not be submitting an amendment increasing animal numbers as the team does not intend on collecting more than 200 snowshoe hares each year as indicated in the protocol application.

In January, 2020 the PI submitted a plan to ensure the incident will not be repeated and the current ADF&G permit.

The IACUC accepted the corrective action plan indicated by the PI.

**Grant/contract number:**

DEB-1026415, PNW01-JV11261952-231

**Impact on PHS-supported activities:**

There were no other effects on PHS or NSF supported projects or in functional, programmatic or physical areas of PHS or NSF supported projects.

Sincerely,

DocuSigned by:  
(b) (6)

556F4A47D9864F4...  
Dr. Nettie La Belle-Hamer  
Interim Vice Chancellor for Research  
Institutional Official

**Morse, Brent (NIH/OD) [E]**

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**From:** Morse, Brent (NIH/OD) [E]  
**Sent:** Wednesday, July 01, 2020 4:08 PM  
**To:** (b) (6)  
**Cc:** IACUC  
**Subject:** RE: Final report for non-compliance

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thank you (b) (6) I'll send an official response soon.

Best regards, Brent Morse

Brent C. Morse, DVM, DACLAM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health

Please note that this message and any of its attachments are intended for the named recipient(s) only and may contain confidential, protected or privileged information that should not be distributed to unauthorized individuals. If you have received this message in error, please contact the sender.

**From:** (b) (6)  
**Sent:** Wednesday, July 01, 2020 2:16 PM  
**To:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>  
**Cc:** IACUC <uaf-iacuc@alaska.edu>  
**Subject:** Re: Final report for non-compliance

Hi Brent,

Attached is the final report for the snowshoe hare project (PI-Kielland). Please let me know if you have any questions.

Thank you for your patience.

Best,

(b) (6)

On Mon, Jun 29, 2020 at 5:38 AM Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov> wrote:

We do not require a "wet" signature. Thanks.

Brent C. Morse, DVM, DACLAM

Director

Division of Compliance Oversight

Office of Laboratory Animal Welfare

National Institutes of Health

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**From:** [REDACTED] (b) (6)  
**Sent:** Thursday, June 25, 2020 6:29 PM  
**To:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>  
**Subject:** Final report for non-compliance

Hi Brent,

I spoke with you on the phone last week about the final report for the snowshoe hare project (PI-Knut Kielland). I have completed it, but want to verify if a docusign by the IO is ok or do you require a wet signature?

Thank you,

[REDACTED] (b) (6)

[REDACTED] (b) (6)

(b) (6)

(b) (6)

## Morse, Brent (NIH/OD) [E]

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**From:** Morse, Brent (NIH/OD) [E]  
**Sent:** Friday, June 05, 2020 1:45 PM  
**To:** Morse, Brent (NIH/OD) [E]  
**Subject:** FW: Case A3837-U update  
**Attachments:** 0365\_001.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Spoke today with (b) (6) She will contact (b) (6) (no longer at the university) and send me an update or final report.

Brent C. Morse, DVM, DACLAM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health

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**From:** OLAW-PTR5@nih.gov <OLAW-PTR5@nih.gov>  
**Sent:** Wednesday, June 03, 2020 8:36 AM  
**To:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>  
**Subject:** Attached Image





## Initial Report of Noncompliance

By: (b) (6)

Date: 10/22/19

Time: 2:20 (b) (6)

Name of Person reporting: (b) (6)

Telephone #: (b) (6)

Fax #: (b) (6)

Email: (b) (6)

Name of Institution: University of Alaska - Fairbanks

Assurance number: A3837

Did incident involve PHS funded activity? NSF

Funding component: \_\_\_\_\_

Was funding component contacted (if necessary): \_\_\_\_\_

What happened? Protocol approved for  $\leq 200$  animals per year. PI used 290+ between Sept 2017 - Sept 2018.

Species involved: Snowshoe Hare

Personnel involved: P.I.

Dates and times: \_\_\_\_\_

Animal deaths: None

Projected plan and schedule for correction/prevention (if known):

Project is finished. The IACUC will review processes to prevent overages on field studies going forward.

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY

Case # \_\_\_\_\_