



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
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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

September 11, 2020

Re: Animal Welfare Assurance  
A3217-01 [OLAW Case 1F]

Ms. Tamara Deuser  
Associate Vice President  
Arizona State University  
660 South Mill Avenue, (b) (4)  
Tempe, AZ 85287-6111

Dear Ms. Deuser,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your September 9, 2020 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Arizona State University, following up on an initial report on August 18, 2020. According to the information provided, OLAW understands that a rat had been inadvertently left in a behavioral testing chamber overnight by a student undergoing training.

The immediate action taken upon discovery consisted of placing the rat in its home cage and providing food and water. The corrective actions consisted of having laboratory staff check all cages when in the housing rooms; resetting the training timeline for the student responsible; modifying a checklist to now include checking all chambers and counting cages in the vivarium along with the person's initials, and having laboratory staff take responsibility for all animals not just those on their project. The Principal Investigator was counseled to follow the corrective action plan and to update the Institutional Animal Care and Use Committee (IACUC) as to the plan's status.

Based on its assessment of this explanation, OLAW understands that measures have been implemented to correct and prevent recurrence of this problem. OLAW concurs with the actions taken by the IACUC to comply with the PHS Policy.

Sincerely,

(b) (6)

Axel Wolff, M.S., D.V.M.  
Deputy Director  
Office of Laboratory Animal Welfare

cc: IACUC Chair

September 9, 2020

A3217

Brent Morse, DVM  
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: Report of Noncompliance under Animal Welfare Assurance #D16-00136

Research Facility: ISTB-1  
Species: *Rattus norvegicus*  
Principal Investigator: Janet Neisewander  
Funding Source: National Institutes of Health  
Incident: Failure to return rat to home cage

On July 31, 2020 the lab manager was conducting the final session of training with a student. They had performed a rat self-administration study in which the rats are moved from the vivarium to the lab study rooms where the behavior chambers are housed. Following completion of the study, the lab manager asked the student to transfer the rats to their home cages for transport to the vivarium while he (the lab manager) tended to an experiment within the research lab proper. When the lab manager returned to the study room, the rat cages were already covered on the cart in preparation for their return to the vivarium. The lab manager asked the student to go ahead and return the rats to the vivarium.

The following day, the lab manager discovered that one rat had been left in the study chamber rather than having been transported back to the vivarium. He immediately provided food and water to the rat in its home cage in the vivarium and contacted the Principal Investigator (PI). Together, they then contacted the IACUC Chair and IACUC Compliance office.

#### Corrective Action

The lab implemented the following steps to help ensure that this does not happen again:

- All lab personnel check all cages (not only those for their own project) when in the housing rooms;
- The training clock was reset for the student (this is written in the lab's training plan);
- A checklist in current use was modified to include active checking of all chambers in the study room and cage count in the vivarium, to be initialed for every procedure that includes moving the rats from the vivarium;

- Lab leaders established an emphasis on each person taking responsibility for all animals, regardless of project participation.

A preliminary report was filed with OLAW on August 18, 2020. The IACUC reviewed the PI's Action Plan at the fully convened meeting on August 27, 2020. The committee agreed with the steps taken by the lab and did not add any further requirements. However, at the suggestion of the committee, the Chair and IACUC Compliance Coordinator joined the PI in a Zoom call on September 1, 2020, to discuss the importance of making sure the chosen Action Plan is working and is accomplishing the goals set by the lab. The PI agreed with the importance of monitoring and will periodically update the committee of success or changes as needed.

The committee feels that the PI has made an appropriate commitment to monitoring practices put into place to ensure that this incident is not repeated in the future.

Please let us know if you have any questions.

Sincerely,

(b) (6)

Karen Kibler, PhD  
Chair, IACUC  
Assistant Research Professor  
(b) (6)  
[Karen.Kibler@asu.edu](mailto:Karen.Kibler@asu.edu)

(b) (6)

Tamara Deuser, MBA, PMP  
Institutional Official  
Associate Vice President  
(b) (6)  
[Tamara.Deuser@asu.edu](mailto:Tamara.Deuser@asu.edu)

**Wolff, Axel (NIH/OD) [E]**

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, September 11, 2020 7:59 AM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Final Report of Noncompliance under Assurance D16-00136

Thank you for this report, (b) (6) We will send a response soon.  
Axel Wolff

**From:** (b) (6)  
**Sent:** Thursday, September 10, 2020 5:07 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Tamara Deuser <Tamara.Deuser@asu.edu>; Karen Kibler <Karen.Kibler@asu.edu> (b) (6)  
(b) (6) iacuc@asu.edu; (b) (6)  
(b) (6)  
**Subject:** Final Report of Noncompliance under Assurance D16-00136  
**Importance:** High

Good Afternoon,

On behalf of the ASU IACUC, I am submitting the final Noncompliance Report for the event reported to you below on August 18, 2020.

If you have any questions or need further information please don't hesitate to contact me.

Best Regards,  
(b) (6)

(b) (6)

*This message may contain information that is privileged, confidential and exempt from disclosure under applicable law. Please do not copy or forward this message without permission. If you are not the intended recipient, please delete all copies and notify me immediately by reply e-mail or by telephone (480) 965-6792 so we may correct our records*

**From:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Sent:** Wednesday, August 19, 2020 4:23 AM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** RE: Preliminary Report of Noncompliance under Assurance D16-00136

Thank you for this preliminary report, (b) (6) We will start a new case file.

Axel Wolff, M.S., D.V.M.

Deputy Director, OLAW

**From:** [REDACTED] (b) (6)

**Sent:** Tuesday, August 18, 2020 1:30 PM

**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>

**Cc:** Tamara Deuser <Tamara.Deuser@asu.edu>; Karen Kibler <Karen.Kibler@asu.edu>; [REDACTED] (b) (6)

(b) (6)

[iacuc@asu.edu](mailto:iacuc@asu.edu)

**Subject:** Preliminary Report of Noncompliance under Assurance D16-00136

**Importance:** High

Good Morning,

On behalf of the ASU IACUC, I am submitting a preliminary report of a failure to adhere to an IACUC-approved protocol to remove mice from a testing chamber. The IACUC is investigating this matter. A follow up message with a final report will be provided when the inquiry is complete.

If you have any questions please contact me.

Thank you,

[REDACTED] (b) (6)

[REDACTED] (b) (6)

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**Wolff, Axel (NIH/OD) [E]**

A3217-1F

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**Sent:** Wednesday, August 19, 2020 7:23 AM  
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Deputy Director, OLAW

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**Cc:** Tamara Deuser <Tamara.Deuser@asu.edu>; Karen Kibler <Karen.Kibler@asu.edu>; (b) (6)  
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iacuc@asu.edu  
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