

DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:
Office of Laboratory Animal Welfare
Rockledge One, Suite 360
6705 Rockledge Drive - MSC 7982
Bethesda, Maryland 20892-7982
Home Page: http://grants.nih.gov/grants/olaw/olaw.htm

FOR EXPRESS MAIL:
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Rockledge One, Suite 360
6705 Rockledge Drive
Bethesda, Maryland 20817
Telephone: (301) 496-7163
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July 20, 2017

Re: Animal Welfare Assurance #A3073-01 (OLAW Case D)

Andrew M. Welch, MHA, FACHE Medical Center Director New Mexico VA Health Care System 1501 San Pedro Drive SE Albuquerque, NM 87108

Dear Mr. Welch,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your July 19, 2017 letter reporting an adverse event involving mice at the New Mexico VA Health Care System, following up on an initial telephone notification on June 27, 2017. According to the information provided, OLAW understands that 6 of the 12 knockout mice died unexpectedly following tamoxifen administration, exceeding the estimated 25% mortality rate. The IACUC determined that the observed elevated mortality may have been related to drug formulation since no mortality occurred when the study was repeated at a later date. The associated animal activity was not PHS funded.

The corrective actions consisted of reformulating the drug to ensure that all parameters, including concentration, purity, sterility and pH are appropriate; performing necropsies on mice that die following tamoxifen treatment in the future in an effort to discern the cause of death and enhancing vigilance regarding quality assurance in the preparation of agents that will be administered to mice.

Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate, correct and prevent recurrence of the noncompliance. We appreciate being informed of these matters and find no cause for further action by this Office.

| Sincerely, |
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| (b)(6) |
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| Neera V. Gopee, DVM, PhD, DACLAM, DABT |
| Animal Welfare Program Specialist |
| Division of Compliance Oversight |

| cc: | IACUC Chair | _ | |
|-----|-------------|-------------------------------------|---|
| | (b)(6) | D.V.M., Chief Veterinary Officer, V | 1 |
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Department of Veterans Affairs

New Mexico VA Health Care System 1501 San Pedro Drive SE Albuquerque, NM 87108-5154

> In Reply Refer to: 501/151 Unexpected Study Outcome Final Report D16-00040 (A3073-01)

Dr. Neera Gopee Division of Compliance Oversight Office of Laboratory Animal Welfare National Institutes of Health Rockledge 1, Suite 360, MSC 7982 Bethesda, MD 20892-7982

RE: Assurance D16-00040 (A3073-01) - Unexpected Study Outcome

Dear Dr. Gopee:

As per our telephonic report on June 27, 2017, we had higher than expected mortality of mutant mice associated with an approved Tamoxifen dosing experiment conducted December 20, 2016 through January 6, 2017. This concern was reported and reviewed by the IACUC on January 10, 2017. Since we were uncertain about expected morbidity/mortality for this particular mutant strain, the committee requested refinement of the drug preparation and dosing methods to determine whether this outcome was inherent to the strain or due to methods. For this reason, we delayed reporting this unexpected event. However, based upon discussion with you and input from AAALAC site visitors on June 22, 2017, we recognize that we should have reported this at the time of the incident since mortality was not defined as an expectation in the approved protocol.

Unexpected Adverse Study Outcome

During an experiment in late December 2016 through early January 2017 when 12 conditional knockout mice were injected with Tamoxifen, 50% (6 total) either were euthanized due to morbidity or died. Although we were uncertain about expected outcomes for this genotype, mortality with this procedure for most strains is generally minimal and definitely not greater than 25%. The activity was not PHS funded.

Corrective Actions

During the initial IACUC review, January 2017, we were not sure what level of mortality might be expected with this particular genotype. For that reason, the committee requested that the PI: 1) reformulate the drug to assure concentration, purity, sterility,

D16-00040 (A3073-01)

pH and other parameters meet safety and efficacy standards; 2) allow the veterinarian the opportunity to conduct necropsies on future mice, if any, that die following tamoxifen dosing to determine whether cause of death is associated with drug toxicity effects or other potential causes.

Subsequent to reformulating, the experiment was repeated June 6-13, 2017 and all mice survived with no morbidity. The committee reviewed the outcome of the second experiment on July 11, 2017. The committee decided that the adverse outcome was likely related to the drug formulation. The IACUC requested that in the future the PI and laboratory staff assure more vigilance in quality assurance and preparations of agents for administration to animals.

| If you have questions or need additional information, please contact of the least o | at |
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| Sincerely, | |
| (b)(6) | |
| Andrew M. Welch, MHA, FACHE | |
| Medical Center Director | |
| Institutional Official | |
| cc: Ph.D., IACUC Chair D.V.M., Chief Veterinary Officer, VA | |
| (D)(O) | |

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Wolff, Axel (NIH/OD) [E] OLAW Division of Compliance Oversight (NIH/OD) From: Wednesday, July 19, 2017 11:47 AM Sent: (b)(6)To: RE: D16-00040 (A3073-01) Final Report Subject: Thank you for this report, (b)(6) Dr. Gopee will send a response soon. Axel Wolff, M.S., D.V.M. Director, Division of Compliance Oversight **OLAW** From: (b)(6) @va.gov] Sent: Wednesday, July 19, 2017 10:48 AM To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov> @va.gov>;^{(b)(6)} @va.gov>; Fallon, Michael DVM PhD Cc:(b)(6) @va.gov>(^{(b)(6)} @va.gov>;^{(b)(6)} @va.gov> (b)(6) Subject: D16-00040 (A3073-01) Final Report Hello Dr. Gopee,

Please see attached Final Report.

New Mexico VA Health Care System

@va.gov

Albuquerque, NM

email: (b)(6)

(b)(6)



Initial Report of Noncompliance

By: Neara Gogea

| Date: \-27-17 | Time: 3-346W |
|--|---------------------------------------|
| Name of Person reporting: Telephone #: Fax #: Email: | |
| Name of Institution: Assurance number: | |
| Did incident involve PHS funded activity Funding component: Was funding component contacted (if | |
| What happened? | you doing 12 mice with tamoxiper . |
| Species involved: New Personnel involved: Dates and times: Animal deaths: | |
| Projected plan and schedule for correct | ion/prevention (if known): |
| Projected submission to OLAW of fina | l report from Institutional Official: |
| OFFICE USE ONLY Case # | 8 |