



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) 402-7065

July 1, 2019

Re: Animal Welfare Assurance  
A4528-01 [OLAW Case 2F]

(b) (6)

Commander  
US Army Medical Research Institute of  
Chemical Defense  
3100 Ricketts Point Road  
Aberdeen Proving Ground, MD 21010-5400

Dear (b) (6)

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your June 19, 2019 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the US Army Medical Research Institute of Chemical Defense. According to the information provided, OLAW understands that eight rats were euthanized at an earlier timepoint than described in the approved protocol. This change did not lead to any increase in pain or distress.

The corrective actions consisted of amending the protocol.

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 institution to comply with the PHS Policy.

Sincerely,

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

cc: IACUC Chair



DEPARTMENT OF THE ARMY  
U.S. ARMY MEDICAL RESEARCH INSTITUTE OF CHEMICAL DEFENSE  
8350 RICKETTS POINT ROAD  
ABERDEEN PROVING GROUND, MD 21010-5400

June 19, 2019

Office of the Commander

Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
6700B Rockledge Drive  
Suite 2500, MSC 6910  
Bethesda, MD 20892

Dear Sir:

Please reference the Office of Laboratory Animal Welfare Assurance number D16-00776. The incident described below occurred on a protocol funded by the National Institutes of Health, grant #AOD18015-001-00000.

**ANIMAL WELFARE CONCERN.** During a recent review of a publication, our Institutional Animal Care and Use Committee (IACUC) Chair discovered that the investigator stated that eight rats were euthanized at two hours versus six hours (which was approved in the protocol). The investigator stated that they, in conjunction with their collaborator, determined that the genomic data generated from the six hour would be of less value than data generated from a two hour time point, due to the fact that major signs of sodium fluoroacetate poisoning (e.g. whole body convulsions) typically present sometime after the two hour mark. Even though the adjustment was made without approval of the IACUC, it did not result in any increase in the unalleviated pain or distress to the animals.

**CORRECTIVE ACTION.** Upon discovery and notification the investigator immediately submitted an amendment to the IACUC for review and approval.

Since this change in euthanasia time was a protocol noncompliance on a protocol funded by the National Institutes of Health, the IACUC determined it needed to be reported to the Office of Laboratory Animal Welfare.

My point of contact for this matter is (b) (6), our Institutional Animal Care and Use Committee Chairman, at (b) (6)

Sincerely,

(b) (6)

(b) (6)

Institutional Official/Commanding

cc:

U.S. Army Medical Research and Development Command, Animal Care and Use  
Review Office  
Association for the Assessment and Accreditation of Laboratory Animal Care,  
International

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Thursday, June 27, 2019 6:58 AM  
**To:** (b) (6) USARMY MEDCOM USAMRICD (USA)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: USAMRICD Noncompliance Letters (Assurance #D16-00776)

Thank you for these reports, (b) (6). We will respond soon.

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

-----Original Message-----

**From:** (b) (6) USARMY MEDCOM USAMRICD (USA) <(b) (6)>  
**Sent:** Wednesday, June 26, 2019 1:24 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** USAMRICD Noncompliance Letters (Assurance #D16-00776)

Good afternoon.

Attached are two letters of non-compliances that were recently reported to our IACUC office.

If you have any questions on this please contact (b) (6)

Thank you.

(b) (6)

(b) (6)

IACUC Coordinator  
8350 Ricketts Point Road

(b) (6)

Aberdeen Proving Ground, MD 21010-5400

(b) (6)