



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

February 20, 2020

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

(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 your 7 February 2020 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the U. S. Army Medical Research Institute of Chemical Defense (USAMRICD). According to the information provided, OLAW understands that three rats died from apparent anesthetic complications associated with surgery to implant a transmitter device. There was no report of protocol noncompliance but surgical records were found to be incomplete. It was noted that the involved animals were assigned to an activity funded by the PHS.

A protocol amendment was drafted to lower the dose of ketamine. The clinical veterinarian also agreed on a following day to lower the ketamine dose as requested. The IACUC also requested that the clinical veterinarian observe more surgeries, monitor and retrain the observer who filled the surgical records, verify the mixing and dose of anesthesia, and review the animal training records of individuals involved. The IACUC requested that a Post Approval Monitoring visit be completed by the attending veterinarian and one other IACUC member during the next surgery.

The consideration of this matter by the USAMRICD was consistent with the philosophy of institutional self-regulation. Similarly, the actions taken to resolve the issue and prevent recurrence were appropriate. OLAW appreciates being informed of this incident and finds no cause for further action by this office at this time.

Sincerely,

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

cc: IACUC Contact



A4528-2I

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

7 February 2020

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 #AOD18013-001-00000.

**ANIMAL WELFARE CONCERN.** The investigator reported three rats died after receiving meloxicam 30 minutes prior to admixed ketamine and dexmedetomidine. The first rat was not fully anesthetized and given a booster of a third of the original dose of ketamine. After failing to reach a surgical plane the investigator decided not to do surgery on that rat, however, the rat died in the recovery chamber approximately 3 hours after administration of the anesthetics. The other two rats underwent a 30 minute surgery to implant a transmitter device. After surgery the rats were placed in a recovery chamber and were administered sustained release buprenorphine. One rat died unexpectedly in the recovery chamber approximately 2 hours after the anesthetics were administered. The second rat died approximately 5 hours after administration of the anesthetics. Attempts to restore breathing were unsuccessful. It is unlikely that any further action could have been taken to prevent this as unusual or unpredictable responses to anesthesia are known to sometimes occur. Surgery was stopped for the day and a protocol amendment was drafted to lower the dose of ketamine. The clinical veterinarian stated she observed surgeries on a following day and agreed to lower the ketamine dose as requested. When the IACUC reviewed the surgical records they found them to be incomplete.

**CORRECTIVE ACTIONS.** The committee requested that the clinical veterinarian observe more surgeries, monitor and retrain the observer who filled the surgical records, verify the mixing and dose of anesthesia, and review the animal training records of individuals involved. The IACUC requested that a Post Approval Monitoring visit be completed by the attending veterinarian and one other IACUC member during the next surgery.

My point of contact for this matter is (b) (6), our IACUC Chairman,  
at (b) (6)

Sincerely,

(b) (6)

Institutional Official/Commanding

cc:  
U.S. Army Medical Research and Development Command, Animal Care and Use  
Review Office

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Monday, February 10, 2020 11:11 AM  
**To:** (b) (6) USARMY MEDCOM USAMRICD (USA)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: USAMRICD Noncompliance Report (UNCLASSIFIED)

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

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

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

**From:** (b) (6) USARMY MEDCOM USAMRICD (USA) <(b) (6)>  
**Sent:** Monday, February 10, 2020 10:29 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** USARMY APG MEDCOM USAMRICD Mailbox IACUC <usarmy.apg.medcom-usamricd.mbx.iacuc@mail.mil>  
**Subject:** USAMRICD Noncompliance Report (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Good morning.

Reference: Assurance #D16-00776

Attached is letter reporting a recent noncompliance that was reported to our office.

If you have any questions, please contact (b) (6)

Thank you.

(b) (6)

(b) (6)  
IACUC Coordinator  
US Army Medical Research Institute of Chemical Defense  
8350 Ricketts Point Road  
(b) (6)  
Aberdeen Proving Ground, MD 21010-5400  
(b) (6)

CLASSIFICATION: UNCLASSIFIED