



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

March 20, 2020

Re: Animal Welfare Assurance
A3304-01 [OLAW Case 3R]

Dana L. Director, Ph.D.
Vice President for Research Operations
And Student Affairs
Oregon Health and Science University
3181 SW Sam Jackson Park Rd.
Portland, OR 97239-3098

Dear Dr. Director,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your March 19, 2020 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Oregon Health & Science University, following up on an initial telephone report on February 26, 2020. According to the information provided, OLAW understands that two individuals attempted to euthanize eleven rats for tissue harvest although neither person was approved to work with live animals, neither was qualified to handle animals, and neither was qualified to conduct euthanasia. Unfamiliar animals were combined in the same cage for euthanasia and one rat escaped and injured its tail.

The immediate action taken upon discovery consisted of an animal care technician capturing the rat. The incident was reported to a supervisor and access to the vivarium was revoked for all members of the laboratory. The corrective actions consisted of prohibiting taking live animals to the laboratory that needed the carcasses for tissue harvest, allowing only qualified staff to conduct euthanasia, ensuring staff conducting animal activities are listed on the protocol, and retraining the laboratory staff on regulatory requirements for conducting live animal activities.

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,

(b) (6)

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

cc: IACUC Chair



Research & Innovation Office

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Dana Director, PhD
Vice President of Research
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Officer

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March 19, 2020

Brent Morse, DVM, DACLAM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare (OLAW)
National Institutes of Health
6700B Rockledge Drive, Suite 2500, MSC 6910
Bethesda, MD 20892

Dear Dr. Morse:

Oregon Health & Science University (OHSU), in accordance with Assurance D16-00195 (A3304-01) and PHS Policy IV.F.3., provides this report of non-compliance involving the conduct of animal activities by personnel not approved on an animal care and use protocol. This was first reported to you on February 26, 2020 via a telephone voice message from Vickie L. Jarrell, Ph.D., Director, Animal Care & Use Program.

The incident occurred on January 21, 2020 and involved 11 rats assigned to one Animal Use Protocol (#0160). The investigator's laboratory routinely provided surplus rat carcasses to another investigator for tissue harvest. In this specific instance, a graduate student from the recipient laboratory was informed that animals were available. No one from the donor laboratory was available to conduct the euthanasia at the time.

The graduate student had approved access to a room adjacent to the animal area based upon a need to operate equipment in that location. The student did not have permission to enter the animal housing rooms. The graduate student solicited the help of another member of the recipient laboratory and entered the animal facility. Neither individual was approved to work with live animals. Neither individual was qualified to handle the animals or conduct euthanasia. The individuals inappropriately removed animals from their home cages and combined several unfamiliar animals from multiple cages. Inappropriate handling of one rat resulted in its escape within the room and an injury to the tip of its tail. An animal care technician was alerted to the problem, caught the rat, and returned it to the cage. The animal caretaker recognized that procedures were not being conducted appropriately and reported the incident to her supervisor the next day. Access to the animal facility and the adjacent laboratory space was revoked immediately for all members of the recipient laboratory.

The incident was reported to the IACUC on March 18, 2020. After careful consideration, it was determined this incident was not reflective of a larger

problem. The committee discussed and approved the following corrective action plan in response to this event:

- No live animals will be provided to the recipient laboratory in the future. The Principal Investigator of the donor laboratory will ensure that only qualified personnel listed on an approved animal use protocol will conduct euthanasia and provide animal carcasses to the recipient laboratory.
- All personnel in the recipient laboratory have been trained regarding regulatory compliance requirements for the use of live animals.

We have determined there were no expenditures from PHS funding associated with this incident.

OHSU is committed to protecting the welfare of animals used in research and appreciates the guidance and assistance provided by OLAW in this regard. Should you have any questions regarding this report, please contact Dr. Jarrell (b) (6) or jarrellv@ohsu.edu).

Thank you for your consideration of this matter.

Sincerely,

(b) (6)

Dana L. Director, Ph.D.

Vice President of Research Administration & Senior Staff Officer
Institutional Official
Oregon Health & Science University

cc: Attending Veterinarian
IACUC Chair
Director, Animal Care & Use Program

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Friday, March 20, 2020 7:03 AM
To: Vickie Jarrell
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: report of noncompliance

Thank you for this report, Dr. Jarrell. We will send a response soon.

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

From: Vickie Jarrell <jarrellv@ohsu.edu>
Sent: Thursday, March 19, 2020 6:07 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: (b) (6) Dana Director <director@ohsu.edu>; (b) (6)
Vickie Jarrell <jarrellv@ohsu.edu>
Subject: report of noncompliance

Dear Dr. Morse:

Please find attached the final report of a noncompliance incident that occurred at the Oregon Health & Science University, Assurance D16-00195 (A3304-01).

Respectfully,

Vickie Jarrell, PhD
Director, Animal Care and Use Program
OHSU Research Integrity
(b) (6)
jarrellv@ohsu.edu



Initial Report of Noncompliance

By: (b) (6)

Date: 2/26/20

Time: 5:45 voice mail

Name of Person reporting: Vicky Jarrell

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: Oregon Health + Science U

Assurance number: A3304

Did incident involve PHS funded activity? _____

Funding component: _____

Was funding component contacted (if necessary): _____

What happened?

11 rats euthanized by people not on protocol, not trained

Species involved: Rats

Personnel involved:

Dates and times:

Animal deaths:

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

I Amc investigating

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY

Case # _____