



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

April 27, 2020

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

Dr. Dana Director  
Vice President for Research Operations  
And Student Affairs  
Oregon Health and Science University  
3181 SW Sam Jackson Park Rd., MC L335  
Portland, OR 97239-3098

Dear Dr. Director,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your April 22, 2020 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Oregon Health and Science University. Your letter supplements the information in a telephone prompt report received on March 24, 2020. According to the information provided, OLAW understands that on January 31, 2020 an animal care technician at the Oregon National Primate Research Center (ONPRC) neglected to secure a drain cover in an outdoor enclosure after conducting animal husbandry duties. Upon return, the technician found a juvenile rhesus macaque trapped in the drain. The animal was treated medically after release from the drain and eventually fully recovered from the event. Support for this animal as part of the colony was funded by the PHS.

Corrective actions for this incident included a root-cause analysis by an ONPRC committee as well as a separate investigation by the IACUC Chair and the Director of the Animal Care and Use Program. Both investigations revealed that the incident was caused by human error. Further corrective and preventive actions included retraining of the animal care technician responsible and addressing the issue with all husbandry personnel. Husbandry practices have been updated to verify that enclosures are returned to proper configurations before animals are reintroduced. Training and husbandry documentation has been reviewed as well as the drain cover design.

The consideration of this matter by the Oregon Health and Science University was consistent with the philosophy of institutional self-regulation. Similarly, the actions taken to resolve the issue and prevent recurrence were appropriate. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

**Brent C. Morse -S** Digitally signed by Brent C. Morse -S  
Date: 2020.04.27 12:41:56 -04'00'

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

cc: IACUC Contact

Director, Animal Care & Use program  
Dr. Robert M. Gibbens, USDA, APHIS, AC



April 22, 2020

Brent Morse, DVM, DACLAM  
 Director, Division of Compliance Oversight  
 Office of Laboratory Animal Welfare (OLAW)  
 National Institutes of Health  
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Mail code: L335  
 3181 S.W. Sam Jackson Park Rd.  
 Portland, OR 97239-3098

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 a serious deviation from the provisions of the Guide for the Care and Use of Laboratory Animals. This was first reported to you on March 24, 2020 via a telephone voice message from Vickie L. Jarrell, Ph.D., Director, Animal Care & Use Program.

The incident occurred on January 31, 2020 and involved one juvenile male rhesus macaque of approximately two years of age housed in an outdoor sheltering facility of the Oregon National Primate Research Center (ONPRC). The animal was a member of the ONPRC colony and not assigned to a specific research protocol.

An animal care technician conducted husbandry duties in an outdoor shelter at the ONPRC. The duties included opening the stainless steel cover on a trough drain to sanitize the underside. The employee neglected to close the drain cover before exiting the facility. The employee returned three – four hours later and found an animal with its head and right shoulder protruding from the partially closed drain cover. The animal was released from entrapment and taken directly to the hospital. The animal presented with partial paralysis and ataxia of the right side of its body. A thorough physical examination was performed. Radiographs did not reveal any fractured bones or dislocated joints. The animal received supportive care with analgesics, anti-inflammatory drugs, and oral rehydration therapy.

The animal's condition improved steadily over the next 3 weeks. No residual impacts of the incident remained and the animal was returned to group housing on February 20, 2020. Short-term social separation has demonstrated no negative consequences to animal's behavior. The animal continues to thrive without sustained harm from the injury.

As is standard procedure, an ONPRC committee conducted a root-cause analysis of this incident. The IACUC Chair and Director, Animal Care and Use Program, conducted an independent investigation. Both investigations concluded human error was the cause of the incident.

The OHSU West Campus (ONPRC) IACUC was informed of the incident on March 17, 2020. A full analysis of the incident was presented to the Committee on April 21, 2020. After careful consideration, the IACUC agreed this incident was due to human error and not reflective of a larger problem. The IACUC discussed and approved the following corrective action plan in response to this event:

- Management has re-trained the employee regarding the importance of ensuring equipment has been returned to its original status before leaving the enclosures. Management has also addressed this issue with all husbandry staff responsible for washing the sheltered housing areas.
- Husbandry practices have been modified to include verification that facility issues, such as the drain covers, have been returned to their former state prior to the reintroduction of animals into an area.
- The ONPRC education and training staff have reviewed and revised training and husbandry documentation.
- A working group has been appointed to review the design of the drain covers. An ideal design must not impact the cleanliness of the enclosures, but should allow for washing of the shelter without requiring the drain covers to be opened.

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]**

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, April 24, 2020 7:56 AM  
**To:** Vickie Jarrell  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: final report animal entrapment A3304-01

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

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

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**From:** Vickie Jarrell <jarrellv@ohsu.edu>  
**Sent:** Thursday, April 23, 2020 11:22 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** (b) (6) Hallberg, Gwynn M - APHIS  
<gwynn.m.hallberg@usda.gov>; Vickie Jarrell <jarrellv@ohsu.edu>; Dana Director <director@ohsu.edu>; (b) (6)  
(b) (6)  
**Subject:** final report animal entrapment A3304-01

Dear Dr. Morse: Please find attached the final report from assured institution A3304-01, Oregon Health & Science University, regarding an entrapped rhesus macaque.

If you have any questions, please do not hesitate to contact me.

Respectfully,  
Vickie

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