



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

May 16, 2022

Re: Animal Welfare Assurance
A3400-01 [OLAW Case 4R]

Mr. Brian E. Smith
Associate Vice Chancellor
for Research Infrastructure and Operations
University of California, San Francisco
3333 California Street, (b) (4)
San Francisco, CA 94118

Dear Mr. Smith,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your May 10, 2022 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of California- San Francisco, following up on an initial report on April 29, 2022. According to the information provided, OLAW understands that a group of mice were administered tamoxifen via the intraperitoneal route rather than orally as described in the approved protocol. Of this cohort, several exhibited adverse clinical signs such as decreased activity and body condition, hypersalivation, and hunching.

The immediate action taken upon discovery consisted of treating the affected animals and euthanizing those that had reached the approved humane endpoint. The corrective actions consisted of amending the protocol to include all intended routes of drug administration and the mitigating actions taken to minimize any adverse events.

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 IACUC 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



University of California
San Francisco

Brian E Smith, JD, MBA
Chief Ethics and Compliance Officer
Senior Associate Vice Chancellor -
Research

Box 0294
490 Illinois Street, Room 51Q
San Francisco CA 94143

tel: 415.514.2080
mobile: 415.463.0354
Brian.Smith@ucsf.edu

www.ucsf.edu

May 10, 2022

Brent Morse, DVM
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

RE: Noncompliance Report, Assurance #D16-00253 (#A3400-01)

Dear Dr. Morse,

I am writing to provide the written report of a recent adverse event and non-compliance associated with a PHS-supported study, previously reported to you by phone on April 29, 2022. On April 6, 2022, some animals in a cohort treated the previous week using a standard dosing regimen of tamoxifen were identified by animal care staff exhibiting adverse effects of the agent (e.g., hypersalivation, hunching, decreased activity, decreased body condition). Animals that reached the established humane endpoints in the approved animal use protocol were euthanized, and the remaining animals were provided additional support under veterinary consultation.

Subsequent review of the incident revealed that tamoxifen had been administered correctly using a standard intraperitoneal injection, a protocol-approved route of administration for other agents. However, tamoxifen administration via this specific route was not approved. The laboratory reviewed the incident and submitted a protocol modification to include all intended routes of tamoxifen administration as well as mitigating actions taken to minimize the risk of adverse response. If you have any additional questions, please do not hesitate to contact me or the IACUP Director.

Sincerely,

(b) (6)

Brian E Smith, JD, MBA
Chief Ethics and Compliance Officer
Senior Associate Vice Chancellor – Research
Institutional Official

cc: IACUC Chair
IACUP Director
Attending Veterinarian and LARC Director

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Friday, May 13, 2022 7:45 AM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Final Report for 4.29.22 NC communication

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

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

From: (b) (6)
Sent: Thursday, May 12, 2022 9:23 PM
To: Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>
Cc: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>; (b) (6)
(b) (6)
Subject: [EXTERNAL] Final Report for 4.29.22 NC communication

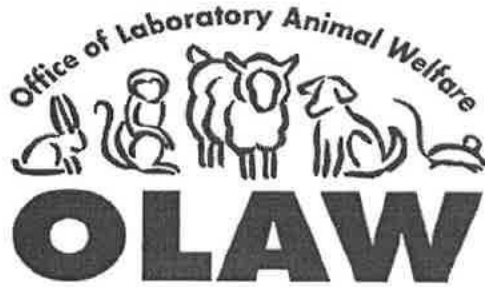
Dear Dr. Morse,

Please find attached the final report for a previously reported non-compliance. If you have any questions, feel free to call or email me.

Best,

(b) (6)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and are confident the content is safe.



Initial Report of Noncompliance

By: BCM

Date: 4/29/2022

Time: 12:35

Name of Person reporting: (b) (6)
 Telephone #: (b) (6)
 Fax #:
 Email:

Name of Institution: UCSF
 Assurance number: A3400

Did incident involve PHS funded activity? yes
 Funding component:
 Was funding component contacted (if necessary):

What happened? 20 KO mice administered tamoxifen by I.P instead of orally per protocol. Mice became ill but were treated and recovered until humane endpoint.

Species involved: mus musculus
 Personnel involved: researcher
 Dates and times: April 8, 2022
 Animal deaths: No

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

Protocol amendment under consideration by IACUC adding I.P. route.

Projected submission to OLAW of final report from Institutional Official:

< 60 days.

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Case #