



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 30, 2022

Re: Animal Welfare Assurance  
#A3180-01 (OLAW Case 6G)

Dr. Robert Nobles  
Vice President for Research Administration  
Emory University  
1599 Clifton Road NE – 1599-001-1BE  
Atlanta, GA 30322

Dear Dr. Nobles,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your March 14, 2022 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Emory University following up on an initial February 1, 2022 notification by telephone.

According to the information provided, this Office understands that the Emory University Animal Care and Use Committee (ACUC) determined that instances of noncompliance occurred with respect to: failure to adhere to the IACUC-approved protocol. The final report states on January 29, 2022, analgesia was not administered to mice as described in the protocol and monitoring checks were also not performed as per protocol. In response to the incident, the following corrective actions were implemented:

- The lab was instructed to cease all surgeries until the approved analgesia could be obtained for use.
- A PAM was requested and completed on February 9, 2022, which involved coaching the lab on adherence the approved protocol and coaching the lab on correctly completing monitoring checks.
- A modification to the protocol regarding the use of analgesia was submitted by the lab and approved by the IACUC on February 28, 2022.

The IACUC determined the corrective actions were appropriate to prevent recurrence of this type of incident, and it is noted that this research is supported by NIH funding.

Based on its assessment of this explanation, OLAW understands that the Emory University has implemented appropriate measures to correct and prevent recurrences of these problems and is now compliant with provisions of the PHS Policy.

We appreciate being informed of these matters and find no cause for further action by this Office.

Sincerely,

Jacquelyn T.

Tubbs -S

Jacquelyn Tubbs, DVM, DACLAM

Senior Animal Welfare Program Specialist

Division of Compliance Oversight

Office of Laboratory Animal Welfare

Digitally signed by Jacquelyn  
T. Tubbs -S  
Date: 2022.03.30 14:18:32  
-04'00'

cc: IACUC Contact



EMORY  
UNIVERSITY

Institutional Animal Care and Use Committee

March 14, 2022

Jacquelyn Tubbs, DVM  
Veterinary Medical Officer  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health

Re: Emory University, Animal Welfare Assurance #A3180-01

Dear Dr. Tubbs,

The Emory University Institutional Animal Care and Use Committee (IACUC), through the Institutional Official, is reporting the results of an event as required by section IV, F, 3a of the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy). A preliminary report was provided via phone call to your office on 2/1/22. This is the final report regarding a protocol violation of the use of analgesia and incomplete monitoring checks. The associated NIH-funded grants are R01HL145644.

Situation and Assessment

On January 29, 2022, it was determined that analgesia was not being used as per protocol and monitoring checks were not performed as per protocol.

The corrective actions to prevent a recurrence were:

- The lab was told to cease all surgeries until the approved analgesia could be obtained and used.
- A PAM was requested and completed on 2/9/22. The PAM consisted of coaching the lab on correctly following the approved protocol and coaching the lab on correctly completing monitoring checks.
- A modification to the protocol regarding the use of analgesia was submitted by the lab and approved by the IACUC Committee on 2/28/22.

The IACUC believes its investigation of this incident was thorough and the corrective actions appropriate to prevent a similar occurrence. If you have questions regarding this incident, please contact me or (b) (6)

Thank you, (b) (6)

3/22/2022 | 4:35 PM EDT

Robert Nobles, DrPH, MPH, CIP  
Vice President for Research Administration  
Emory University  
1599 Clifton Road NE  
Atlanta, GA 30322  
Office: (b) (6)  
Email: [Robert.e.nobles@emory.edu](mailto:Robert.e.nobles@emory.edu)

## Tubbs, Jai (NIH/OD) [E]

---

**From:** (b) (6)  
**Sent:** Wednesday, March 23, 2022 2:03 PM  
**To:** Tubbs, Jai (NIH/OD) [E]  
**Cc:** (b) (6)  
**Subject:** [EXTERNAL] Final OLAW letters for Emory University, Animal Welfare Assurance #A3180-01  
**Attachments:** Please\_DocuSign\_Final\_letter\_to\_OLAW-3-2022\_.zip;  
Please\_DocuSign\_Final\_letter\_to\_OLAW-4-2022\_.zip;  
Please\_DocuSign\_Final\_letter\_to\_OLAW-1-2022\_.zip  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**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.

Good afternoon Dr. Tubbs,

Please find the attached final OLAW letters. If there are any concerns, please feel free to contact me. This is my first time sending them via DocuSign. Please let me know if you need them in a different format. There should be four in all.

Warm Regards,

(b) (6)



**A3180-6G**

## **Initial Report of Noncompliance**

By: J. Tubbs

Date: **02-01-2022**

Time: 307P

Name of Person reporting: (b) (6)

Telephone #: (b) (6)

Fax #:

Email: (b) (6)

Name of Institution: Emory University

Assurance number: A3180-01

Did incident involve PHS funded activity? TBD

Funding component:

Was funding component contacted (if necessary): \_\_\_\_\_

What happened?

Protocol violation- analgesia administered was not on the protocol.

Species involved: mice

Personnel involved:

Dates and times: Jan 2022

Animal deaths: none

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

Corrective action plan in development

Projected submission to OLAW of final report from Institutional Official:

60-90d

**OFFICE USE ONLY**

Case # \_\_\_\_\_