



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare  
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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 8, 2022

Re: Animal Welfare Assurance  
#A3283-01 (OLAW Case 3K)

Dr. Milan Mrksich,  
Vice President for Research  
Northwestern University  
750 North Shore Drive, (b) (4)  
Chicago, IL 60611

Dear Dr. Mrksich,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your January 31, 2022 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Northwestern University (NU). This letter had not been preceded by a preliminary report to OLAW.

According to the information provided, this Office understands that the NU 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 a Principal Investigator (PI) reported that 9 mice underwent cervical dislocation as a method of euthanasia on December 7, 2021. It was determined that cervical dislocation was the primary method of euthanasia used on the animals, and it is not approved in the protocol. Per the report, the procedure was properly conducted by a trained laboratory member. It is understood that performing euthanasia in the CCM holding room is noncompliant with the CCM Policy on Holding Room Use.

The IACUC discussed the matter at the January 20, 2022 meeting and reviewed the PI's corrective action plan. The plan included the following:

- Review the CCM Policy on Animal Holding Room Use with laboratory members.
- Laboratory members involved in the incident must complete microisolator retraining.
- Amend the protocol to include all primary methods of euthanasia.

It is noted that this research is supported by PHS funding. Based on its assessment of this explanation, OLAW understands that the Northwestern 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

Digitally signed by  
Jacquelyn T. Tubbs -S  
Date: 2022.02.08  
15:32:14 -05'00'

Jacquelyn Tubbs, DVM, DACLAM  
Senior Animal Welfare Program Specialist  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare

cc: IACUC Contact

January 31, 2022

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

Dear Dr. Morse:

I have been informed by the Northwestern University Institutional Animal Care and Use Committee (NU IACUC; Assurance # A3283-01) that a Principal Investigator (PI) reported to the NU IACUC that an incident involving animals occurred. This project is supported by federal funds (RO1 DK116568). The incident report is as follows:

Incident Description:

The Principal Investigator (PI) reported that nine mice underwent cervical dislocation euthanasia on December 7, 2021. After review of the matter, it was found that cervical dislocation as a primary method of euthanasia was not approved in the protocol. The procedure was conducted appropriately by a laboratory member trained and proficient in performing cervical dislocation. Additionally, the conduct of euthanasia in the CCM holding room is noncompliant with the CCM Policy on Holding room Use.

At the January 20, 2022 NU IACUC meeting, the Committee discussed this incident and reviewed the PI's corrective action plan, which included the following elements:

- Discuss the importance of following approved euthanasia procedures with laboratory members.
- Review the approved protocols with all laboratory members at a laboratory meeting.

The Committee accepted the PI's plan, but implemented the following additional requirements:

- Review the CCM Policy on Animal Holding Room Use with laboratory members.
- Laboratory members involved in the incident must complete microisolator retraining.
- Amend the protocol to include all primary methods of euthanasia.

Please let me know if you need any further information.

Sincerely,

(b) (6)

Milan Mrksich, Ph.D.  
Vice President for Research  
Institutional Official

cc:

(b) (6)

C. Heckman, Ph.D., Chair - IACUC

(b) (6)

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Monday, January 31, 2022 9:17 AM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Northwestern Report - OLAW January 2022

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

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

**From:** (b) (6)  
**Sent:** Monday, January 31, 2022 8:41 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Milan Mrksich <milan.mrksich@northwestern.edu>; (b) (6)  
**Subject:** [EXTERNAL] Northwestern Report - OLAW January 2022

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Dear Dr. Morse,

Please the attached letter from Milan Mrksich, Institutional Official.

Thanks,

(b) (6)