



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

November 26, 2021

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

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 November 22, 2021 letter reporting a serious deviation from the provisions of the *Guide for the Care and Use of Laboratory Animals* at Oregon Health & Science University, following up on an initial telephone report on November 11, 2021. According to the information provided, OLAW understands that five gerbils on a behavioral study involving a restricted diet failed to receive food and one animal became lethargic. Miscommunication between laboratory and husbandry staff led to this problem.

The immediate action taken upon discovery consisted of providing food and having the veterinarian examine the gerbils. Despite receiving treatment and supportive care, the lethargic gerbil subsequently died. The corrective actions consisted of the Institutional Animal Care and Use Committee (IACUC) requiring use of a formal electronic request for husbandry services, training staff on use of the new procedure, clearly identifying cages containing animals on restricted diets and having caretakers provide feed on weekends, having caretakers initial a log confirming feeding, having a live-stream camera show the log to research staff who will contact the veterinarian if animals were not fed, and posting pictures in the animal room on where feeders are to be placed in the cage.

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 on Humane Care and Use of Laboratory Animals.

Sincerely,

(b) (6)

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

cc: IACUC Chair  
Robert Gibbens, D.V.M., USDA-APHIS-AC



November 22, 2021

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

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Dana Director, PhD  
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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 November 11, 2021 via a telephone voice message from (b) (6) (b) (6)

The incident occurred on October 2 through October 4, 2021 and involved five gerbils assigned to a study funded by the PHS. The gerbils were undergoing regulated access to their daily ration to encourage them to conduct behavioral tests for food rewards. Controlled access to the ration was scientifically justified and approved by the IACUC. Daily monitoring of the animals was conducted as approved, and no animal had exceeded endpoints defined in the protocol.

A verbal request for services by a laboratory staff member to the husbandry supervisor was not communicated to the husbandry technician responsible for feeding in the room. Consequently, five animals were not given their daily ration on October 2. The problem was identified on October 3 and the animals were immediately provided food. The veterinarian was notified and conducted a physical examination.

Four of five animals were bright and alert. One animal presented as lethargic and was administered fluids by the veterinarian. The animal's condition improved and all five animals consumed their rations provided on October 3. On October 4, when the veterinarian rechecked the animals, the one animal was again lethargic. Thermal and nutritional support were administered, but the animal died shortly after. We cannot confirm that the absence of nutrition was the cause of death, but the coincidence of this error with the animal's demise leads us to report this event.

A quorum of the IACUC discussed the incident at a convened meeting on November 17 and approved the following corrective action plans:

- A formal, electronic service request must be used to request husbandry services. All personnel have been trained to communicate requests for service through this procedure.
- Individual cages containing animals on regulated rations will be marked with a bright yellow card to provide a visual reminder to the husbandry staff of their responsibilities to feed those animals during the weekends.
- Pictorial signage will be placed in the room indicating where to place food containers to facilitate easy access by the animals.
- Husbandry staff will initial a food log indicating the regulated rations have been provided.
- A live-stream camera will be placed in the room allowing visual review of the food log by laboratory personnel from remote sites. If the food log is not initialed by the end of the feeding period each day, the laboratory personnel will contact the veterinarian on call.

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

(b) (6)

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, November 26, 2021 7:16 AM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: final report D16-00195 OHSU

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:** Monday, November 22, 2021 1:56 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Dana Director <director@ohsu.edu>; (b) (6)  
**Subject:** final report D16-00195 OHSU

Dear Dr. Morse,  
Please find attached a final report of a serious deviation from the standards in The Guide from Oregon Health & Science University.

If you have any questions, please feel free to contact me directly.  
Respectfully,

(b) (6)





## Initial Report of Noncompliance

By: (b) (6)

Voicemail

Date: 11/11/21

Time: 2:45

Name of Person reporting: (b) (6)

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: Oregon Health+Science UAssurance number: A3304Did incident involve PHS funded activity? Yes

Funding component: \_\_\_\_\_

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

What happened?

5 Gerbils on restricted diet, didn't get special food and 1 diedSpecies involved: Gerbils

Personnel involved: \_\_\_\_\_

Dates and times: \_\_\_\_\_

Animal deaths: 1

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

I am investigating

Projected submission to OLAW of final report from Institutional Official: \_\_\_\_\_

OFFICE USE ONLY

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