



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, MD 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

January 14, 2022

Re: Animal Welfare Assurance  
A3079-01 [OLAW Case 4D]

Dr. Dawn A. Bonnell  
Vice Provost for Research  
University of Pennsylvania  
1 College Hall, (b) (4)  
Philadelphia, PA 19104-6303

Dear Dr. Bonnell,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your December 14, 2021 letter reporting an adverse event at the University of Pennsylvania. This letter had not been preceded by a preliminary report to OLAW.

According to the information provided, this Office understands that the University of Pennsylvania Animal Care and Use Committee (ACUC) determined that an adverse occurred with respect to: the deaths/euthanasia of nine gerbils. The final report states that gerbils were inoculated with parasitic larvae as described in an IACUC-approved protocol. It is stated the inoculum was prepared using standard methods, but an acute nature of illness developed suggesting the inoculum was contaminated. The Principal Investigator (PI) contacted the veterinary staff and veterinary diagnostic laboratory for assistance once the event occurred. In response, the PI developed a mitigation plan and included an additional purification step to the larval isolation procedure. Per the report, the IACUC Compliance Subcommittee accepted the PI's plan.

It is noted that this project is supported by PHS funding. Based on its assessment of this explanation, OLAW understands that the University of Pennsylvania has implemented appropriate measures to prevent future recurrence of this type of incident. Please notify OLAW if the problem persists or is not solved.

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: 2022.01.14  
15:14:04 -05'00'

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

cc: IACUC contact

(b) (6)

**Office of the Vice Provost for Research**

December 14, 2021

Brent Morse, DVM, DACLAM  
Director of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
RKL 1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, MD 20892-7982

University of Pennsylvania  
A3079-01, Case 12721

Dear Dr. Morse,

The University of Pennsylvania is reporting an adverse event which resulted in the accidental death/euthanasia of nine gerbils. The gerbils were inoculated subcutaneously with parasitic larvae as part of an IACUC-approved parasite treatment study. The inoculum was prepared by standard methods, however the acute nature of illness suggested it must have been contaminated. Once the event occurred, the PI immediately notified the veterinary staff and veterinary diagnostic laboratory for assistance in the case. To avoid this outcome in the future, the PI developed a mitigation plan and has added an additional purification step to the larval isolation procedure. The IACUC Compliance Subcommittee was informed of the incident and has accepted the PI mitigation plan. The project was funded by a subaward of grant 5 R21 AL149037-02 and the sponsor was also notified.

Sincerely yours,

(b) (6)

Dawn Bonnell, PhD  
Senior Vice Provost for Research  
Trustee Professor of Materials Science and Engineering  
Institutional Official

CC: IACUC Chair, University of Pennsylvania  
Attending Veterinarian and ULAR Director, University of Pennsylvania  
Director of Animal Welfare, University of Pennsylvania  
Sponsor of Study

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Monday, December 20, 2021 7:24 AM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: UPenn Adverse Event report

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

**From:** (b) (6)  
**Sent:** Friday, December 17, 2021 11:31 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** [EXTERNAL] UPenn Adverse Event report

**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.

Attached please find an adverse report from the University of Pennsylvania.  
Please contact me if you have any questions.

Regards

(b) (6)