



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 25, 2021

Re: Animal Welfare Assurance
A3377-01 [OLAW Case 8F]

Dr. David P. Norton
Vice President for Research
University of Florida
(b) (4) Grinter Hall
Gainesville, FL 32611-5500

Dear Dr. Norton,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your May 4, 2021 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of Florida following up on an initial March 26, 2021 notification by email.

According to the information provided, this Office understands that the University of Florida Animal Care and Use Committee (ACUC) determined that instances of noncompliance occurred with respect to: the conduct of animal-related activities prior to IACUC review and approval and failure to adhere to the IACUC-approved protocol. The final report states it was self-reported that water and food deprivation occurred on three occasions prior to intestinal permeability tests using FITC-dextran gavage. The protocol does not describe the conduct of these procedures prior to permeability tests. It is understood that food restriction of mice occurred in September 2019 and occurred again in another subset of mice in November 2019. The final instances of noncompliance involved food and water restriction of mice in March 2021. The report further states that the IACUC protocol describes special diet feeding of animals for 16 weeks. However, the feeding period was extended without IACUC approval to 22wk because the development of colitis was determined to be much slower than the laboratory anticipated.

The IACUC voted the matter as a noncompliance on April 20, 2021 and required the following corrective actions:

- A post-approval monitoring (PAM) visit was done on April 7, 2021. Another PAM is scheduled for later this month to observe lab personnel perform the gavage procedure.
- Within 2 weeks of this receipt of this report, the principal investigator must submit to the IACUC a plan to ensure protocol compliance within the laboratory. This should include plans for onboarding new staff as well as ongoing compliance plans with current staff.
- A modification has been submitted and is currently under IACUC review to add food/water deprivation and increase the special diet feeding phase to 25 weeks.
- Data collected during the time of noncompliance and because of the unapproved activities cannot be used and must be discarded.

It is noted that this research is not supported by PHS funds. Based on its assessment of this explanation, OLAW understands that the University of Florida has implemented appropriate measures to correct and prevent recurrences of these problems.

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: 2021.05.25
15:28:56 -04'00'

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

cc: IACUC Contact



Office of the Vice President for Research

223 Grinter Hall
PO Box 115500
Gainesville, FL 32611-5500
352-392-1582

May 4, 2021

Axel Wolff, DVM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health
Rockledge 1, Suite 360
6705 Rockledge Drive
Bethesda, MD 20892

Dear Dr. Wolff:

The University of Florida, in accordance with Assurance D16-00244 (A3377-01) and PHS Policy IV.F.3., provides this report of non-compliance regarding unapproved procedures performed in mice. A preliminary report was sent on March 26, 2021 by Dr. Daniel R. Brown.

It was self-reported that water/food deprivation occurred on three occasions before intestinal permeability tests using FITC-dextran gavage. The IACUC protocol does not describe water/food deprivation before the permeability tests.

- Occasion 1: Twelve C57BL mice and twelve IL-10 knockout mice had food restricted for 5 hours (from 8:00 am to 1:00 pm) on 9/24/2019 and 9/25/2019.
- Occasion 2: Eight C57BL mice and eight IL-10 knockout mice had food restricted for 3.5 hours (from 8:30 am to 12:00 pm) on 11/20/2019 and 11/21/2019.
- Occasion 3: Twenty C57BL mice had food restricted for 16 hours (from 8:00 pm to 12:00 pm of next day) on 3/18/2021. Additional twenty C57BL mice had water restricted 12 hours (from 8:00 pm to 8:00 am of next day) on 3/19/2021.

The IACUC protocol states that 24 wildtype C57BL mice and 24 IL10-deficient mice will be fed AIN93M diet or AIN93M diet supplemented with 5.5% (v/w) of concentrated and dealcoholized muscadine for 16 weeks. The feeding period was extended without IACUC approval to 22 weeks 7/1/2019-12/5/2019 because the development of colitis was found to be much slower than the laboratory anticipated.

The IACUC full committee voted on April 20, 2021 that this incident was a non-compliance and was reportable through the IO to regulatory agencies. The IACUC has required the following corrective actions:

The Foundation for The Gator Nation

An Equal Opportunity Institution

Report of non-compliance

May 4, 2021

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1. A post approval monitoring (PAM) visit was done on 4/7/2021. Another PAM is scheduled for later this month to watch lab personnel perform the gavage procedure.
2. Within 2 weeks of this receipt of this report, the PI must submit to the IACUC a plan to ensure protocol compliance within the laboratory. This should include plans for onboarding new staff as well as ongoing compliance plans with current staff.
3. A modification has been submitted and is currently under IACUC review to add food/water deprivation and increase the special diet feeding phase to 25 weeks.
4. Data collected during the time of noncompliance and as a result of the unapproved activities cannot be used and must be discarded.

The animals involved in this noncompliance were not funded by PHS.

The University of Florida 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 Daniel R. Brown, Ph.D., IACUC Chair.

Thank you for your consideration of this matter.

Sincerely,

(b) (6)

David Norton, Ph.D.
Vice President for Research
Institutional Official

MPM gw

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Monday, May 17, 2021 7:30 AM
To: Research - IACUC
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Reportable noncompliance (2021Mar02) [ref:_00D412ElGo._5001K11k2DO:ref]

Thank you for this report. We will respond soon.

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

From: Research - IACUC <iacuc-crm@research.ufl.edu>
Sent: Friday, May 14, 2021 4:21 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: drbrown@ufl.edu; (b) (6)
Subject: Reportable noncompliance (2021Mar02) [ref:_00D412ElGo._5001K11k2DO:ref]

To All Concerned,

Please see the attached report of noncompliance from the University of Florida (Assurance #D16-00244). A preliminary report was sent via email from Dr. Daniel R. Brown on March 26, 2021. The animals involved in this noncompliance were not funded by the PHS.

Please confirm receipt and let me know if you have any questions.

Best,

(b) (6)



----- Original Message -----

From: res-svc-iacuc-crm [iacuc-crm@research.ufl.edu]
Sent: 5/3/2021, 12:41 PM
To: operations@research.ufl.edu
Subject: 2021Mar02 OLAW letter for IO signature [ref:_00D412ElGo._5001K11k2DO:ref]

[External Email]

[External Email]

Please see attached OLAW letter for IO signature.

(b) (6)



Wolff, Axel (NIH/OD) [E]

A 3377 - 8F

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Friday, March 26, 2021 10:22 AM
To: Brown, Daniel R
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Potential IACUC Non-Compliance

Thank you, Dr. Brown. We will open a new case file.
Axel Wolff

From: Brown, Daniel R <drbrown@ufl.edu>
Sent: Friday, March 26, 2021 10:13 AM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: [REDACTED] (b) (6)
Subject: Potential IACUC Non-Compliance
Importance: High

To All Concerned,

This is preliminary report of a situation potentially involving "failure to adhere to IACUC-approved protocols" at the University of Florida (Assurance #D16-00244). Briefly, through routine monitoring it was discovered that mouse food and water had been restricted for unapproved durations by study staff. The IACUC-approved protocol involved (UF #201910540) is an inflammatory bowel disease study funded by USDA.

On 3/26/2021 I directed IACUC staff to initiate an investigation. A final report to our IACUC is expected within 30 days.

Please contact me with any questions or concerns.

Dan Brown



Daniel R. Brown, PhD
Chairman, UF Institutional Animal Care and Use Committee
Associate Professor of Infectious Diseases & Immunology
College of Veterinary Medicine
University of Florida
Gainesville FL 32611-0880 USA
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