



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

January 18, 2022

Re: Animal Welfare Assurance  
#A3025-01 [OLAW Case Z]

Mr. John McIntire  
Deputy General Counsel and  
Institutional Official  
SRI International  
333 Ravenswood Avenue  
Menlo Park, CA 94025

Dear Mr. McIntire,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your January 10, 2022 letter concerning a report of a noncompliance with the Public Health Service Policy on the Humane Care and Use of Laboratory Animals within the animal care and use program at SRI International. Your letter supplements the information contained in a preliminary phone report submitted on December 22, 2021. According to the information provided, OLAW understands that the Laboratory Animals Medicine Department (LAMD) husbandry staff removed food from two rats at 6 pm on 12/14/21 for a study-driven overnight fast. A fasting period of up to 24 hours is approved under the IACUC protocol. Upon completion of the study, the rats were inadvertently not fed due to a misunderstanding between the investigative and husbandry staff. Each staff assumed the other would feed the rats when the fasting period ended at 3:30 pm on 12/15/21. Consequently, the two rats were not fed until approximately 7:00 am on 12/16/21. The rats were without food for approximately 37 hours. The study was funded by the PHS. The funding agency will be notified separately.

Upon discovery of no food on 12/16, the rats were immediately fed by a LAMD staff member and examined by SRI's veterinary staff. Both rats were noted to have normal appearance and behavior. Body weights were also measured. Animals were examined and weighed again by the veterinary staff on 12/17 to ensure that the rats were continuing to thrive. The Attending Veterinarian (AV) and Principal Investigator (as well as all LAMD and the research team) were also informed of this event on the morning of 12/16. To prevent such noncompliance from recurring, emails were sent to both groups by the AV stressing the importance of verbal and written communication between groups, and in particular the importance that Service Requests regarding changes in feeding must include clear details regarding when and by whom animals will be fed after a protocol driven fast. On 12/21/21, the two research technicians involved in this incident received training from a senior LAMD staff member on how to feed and document feeding of animals that are fasted for study work. Refresher training for the entire LAMD staff was provided at the LAMD staff meeting on 12/21/21.

SRI International's reporting of the matter was consistent with the philosophy of self-regulation. Similarly, the action taken to respond to the issue and prevent recurrence was appropriate. We appreciate being informed of this matter and find no cause for further action by this office.

Page 2 – Dr. McIntire  
January 18, 2022  
OLAW Case A3025-Z

Sincerely,

**Brent C. Morse**

**-S**

Brent C. Morse, DVM

Director

Division of Compliance Oversight

Office of Laboratory Animal Welfare

Digitally signed by Brent C.  
Morse -S

Date: 2022.01.18 15:00:12  
-05'00'

cc: IACUC contact

A3025-Z

# SRI International

January 10, 2022

Brent Morse, DVM, DACLAM  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare, NIH  
6700B Rockledge Drive, Suite 2500, MSC 6910  
Bethesda, MD 20892-7982  
Re: Assurance #3025-01; D16-00012 (new number)

Dear Dr. Morse:

This letter is the written report of the incident phoned in by SRI's IACUC Chair on December 22, 2021.

The incident involved two rats on a study being conducted for the National Institute on Alcohol Abuse and Alcoholism (NIAAA), grant # U01AA013521. The Laboratory Animals Medicine Department (LAMD) husbandry staff removed food from the rats at 6 pm on 12/14/21 for a study-driven overnight fast. A fasting period of up to 24 hours is approved under the IACUC protocol in order to measure the metabolic response to glucose administration. Upon completion of the study, the rats were inadvertently not fed due to a misunderstanding between the investigative and husbandry staff. Each staff assumed other would feed the rats when the fasting period ended at 3:30 pm on 12/15/21. Consequently, the two rats were not fed until approximately 7:00 am on 12/16/21. The rats were without food for approximately 37 hours.

Upon discovery of no food on 12/16, the rats were immediately fed by a LAMD staff member, and examined by SRI's veterinary staff. Both rats were noted to have normal appearance and behavior. Body weights were also measured. Animals were examined and weighed again by the veterinary staff on 12/17 to ensure that the rats were continuing to thrive. The Attending Veterinarian (AV) and Principal Investigator (as well as all LAMD and the research team) were also informed of this event on the morning of 12/16.

To prevent such noncompliance from recurring, emails were sent to both groups by the AV stressing the importance of verbal and written communication between groups, and in particular the importance that Service Requests regarding changes in feeding must include clear details regarding when and by whom animals will be fed after a protocol driven fast. On 12/21/21, the two research technicians involved in this incident received training from a senior LAMD staff member on how to feed and document feeding of animals that are fasted for study work. Refresher training for the entire LAMD staff was provided at the LAMD staff meeting on 12/21/21.

The funding agency will be notified separately.

SRI fully understands all the implications of deviations from IACUC protocols and will take all reasonable approaches to prevent a recurrence. Please do not hesitate to contact me should you have any questions.

Sincerely,

(b) (6)

John McIntire  
Chief Legal Officer  
Institutional Official

(b) (6)

Email: [john.mcintire@sri.com](mailto:john.mcintire@sri.com)

**SRI International**

333 Ravenswood Avenue • Menlo Park, California 94025-3493 • 650.859.2000

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Wednesday, January 12, 2022 7:04 AM  
**To:** Michael Vigil  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: 1.10.22 Self-report to OLAW

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

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

**From:** Michael Vigil <michael.vigil@sri.com>  
**Sent:** Monday, January 10, 2022 3:07 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** IACUC Correspondence <anim-use@sri.com>; John McIntire <john.mcintire@sri.com>  
**Subject:** [EXTERNAL] 1.10.22 Self-report to OLAW

**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.

Dear Sir/Madam:

Enclosed is the written report of an incident initially reported to Dr. Morse on 12/22/2021.

We look forward to the formal response from OLAW. In the interim, may we request confirmation (e.g. email) that the written report has been received? Thank you very much for your time.

Best regards,  
Mike

Michael Vigil, BS, LATG, CPIA  
IACUC Manager  
IACUC Chairperson  
SRI International  
333 Ravenswood Ave  
Menlo Park, CA 94025

(b) (6)



**A3025-Z**

## **Initial Report of Noncompliance**

By: BCM

Date: 12/22/2021

Time: 4:00

Name of Person reporting: Mike Vigil, Chair

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: SRI, Intl

Assurance number: A3025

Did incident involve PHS funded activity? yes

Funding component: NIAAA

Was funding component contacted (if necessary):

What happened? Rat finished 24 hour fasting experiment but due to miscommunication between lab and animal husbandry, rat was not given food until next morning. Went 37 hours w/o food. Rat was O.K.

Species involved: Rattus

Personnel involved: Researcher

Dates and times: ?

Animal deaths: no

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

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY

Case #