



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 1, 2021

Re: Animal Welfare Assurance  
A3230-01 [OLAW Case 50]

Ms. Pamela S. Caudill  
Senior Associate Provost  
for Research Administration  
Yale University – New Haven  
25 Science Park, (b) (4)  
New Haven, Connecticut 06520

Dear Ms. Caudill,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your October 11, 2021 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals within the animal care and use program at Yale University. Your letter supplemented the information contained in an initial email report to this office on June 15, 2021. According to the information provided, OLAW understands that 138 mice did not receive perioperative analgesia as approved in the protocol. The responsible laboratory member changed the surgical analgesic regimen from pre-emptive buprenorphine to a pre-emptive nonsteroidal anti-inflammatory drug without consulting the principal investigator (PI). The laboratory member also did not administer postoperative analgesia or maintain postoperative records for survival surgeries performed. The PI self-reported the incident which was discovered after review of analgesia use and surgery records. No animal health or welfare concerns were reported associated with the surgical procedures. The mice involved were supported by PHS funds.

Corrective and preventive measures included retraining of all laboratory personnel involved in surgical procedures, including the PI. The responsible laboratory member was also counseled regarding the seriousness of the noncompliance issues. The noncompliant laboratory and responsible laboratory member are subject to enhanced monitoring by the university's Office of Animal Research Support (OARS). The responsible laboratory member has transferred to a laboratory that does not conduct surgical procedures, but if surgery is ever added to the current protocol, a meeting will be held with the PI, laboratory member, and representatives from the veterinary and OARS teams to reinforce the expectations of the Institutional Animal Care and Use Committee (IACUC) when conducting surgery. In accordance with university procedure, this incident will be reported to the appropriate NIH Institute/Center.

OLAW appreciates the consideration of this matter by Yale University, which was consistent with the philosophy of institutional self-regulation. Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate this incident and prevent recurrence. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

Robyn M. Engel -S Digitally signed by Robyn M. Engel-S  
Date: 2021.11.01 13:49:33 -0400

Robyn M. Engel, DVM  
Animal Welfare Program Specialist  
Office of Laboratory Animal Welfare

cc: IACUC contact

Yale Office of Research Administration

A3230

PAMELA S. CAUDILL  
Senior Associate Provost  
for Research Administration

PO Box 208327  
New Haven CT 06520-8327  
T 203 785-3012  
F 203 785-3510  
pamela.caudill@yale.edu  
courier  
25 Science Park, Suite 322  
New Haven CT 06511

October 11, 2021

Brent Morse, DVM, DACLAM  
Office of Laboratory Animal Welfare  
National Institutes of Health  
6700B Rockledge Drive  
Suite 2500, MSC 6910  
Bethesda, MD 20892

Dear Dr. Morse:

In accordance with the Public Health Service Policy and Yale University's Animal Welfare Assurance (#D16-00146), I am writing to report the fact-finding results of an animal welfare-related incident self-reported by a Principal Investigator (PI).

On April 26, 2021, a PI self-reported to the Office of Animal Research Support (OARS) that an unknown number of mice that underwent surgery had not received analgesics as approved in the protocol. The need to order additional anesthetic agent for upcoming surgeries led to the review of analgesic use and surgery records.

During OARS' fact-finding activity with the PI and lab personnel, the following information was relayed:

- During the summer of 2020, a lab member expressed a concern regarding the use of isoflurane anesthesia, consulted with a veterinarian, and the protocol was modified and approved to use ketamine/xylazine for surgical procedures.
- Subsequent to this change, without notifying the PI, the lab member discontinued the use of pre-emptive buprenorphine due to the longer recovery time when using ketamine/xylazine.
- During the period of August to December 2020, the lab member did not administer postoperative analgesia or maintain post-operative records for survival surgeries performed.
  - o Controlled substance logs and vial stocks were reviewed, and it was confirmed this information was not included.
  - o Surgery records reviewed by OARS indicated that nonsteroidal anti-inflammatory drugs were pre-emptively administered instead.
- There were no animal health or welfare concerns reported by YARC or VCS during this time and related to this protocol.
- During the months of November and December 2020, the same lab member began training a new student to cover for the lab member's anticipated leave of

absence. Training was abbreviated due to an earlier-than-expected departure and resignation of the lab member. The lab did not request addition training from OARS.

- During this period of time a total of 235 surgeries were performed on 138 mice.
- Effective June 2021, the lab member took a position working in another laboratory and on an unrelated protocol.

In May 2021, all current lab personnel involved in surgical procedures, including the PI, were re-trained by OARS. The IACUC reviewed the details of the incidents at the May and June 2021 meetings. The IACUC Chair and OARS leadership met with the PI. In a separate meeting, the OARS leadership met with the lab member to emphasize the seriousness of the non-compliance issues described above.

In addition, OARS is conducting enhanced monitoring of the non-compliant laboratory and of the responsible lab member in the new laboratory. It should be noted that the lab member's current laboratory does not conduct surgery, but if surgery is ever added to the current protocol, a meeting will be held with the PI, lab member, and representatives from the veterinary and OARS teams to reinforce the IACUC's expectations when conducting surgery. Throughout the investigation, the PI was very cooperative and contrite that something so serious could have happened in their lab.

In accordance with university procedure, this incident will be reported to the appropriate NIH Institute/Center. If you have questions regarding this report, please contact (b) (6)

(b) (6)

Sincerely,

**Pamela  
Caudill**

Pamela S. Caudill  
Institutional Official  
Senior Associate Provost for Research Administration

Digitally signed by  
Pamela Caudill  
Date: 2021.10.11  
13:40:21 -04'00'

Cc:

(b) (6)

Gary Cline, IACUC Chair, Yale University  
James Macy, Attending Veterinarian, Yale University

(b) (6)

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

---

**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Tuesday, October 12, 2021 4:59 AM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: A Final Report from Pamela Caudill of Yale University dated October 11, 2021

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, October 11, 2021 2:08 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Macy, James <james.macy@yale.edu>; (b) (6) Caudill, Pamela  
<pamela.caudill@yale.edu>; accredit@AAALAC.org; (b) (6)  
**Subject:** A Final Report from Pamela Caudill of Yale University dated October 11, 2021

Dear Dr. Morse,

I've attached a final report from Pamela Caudill of Yale dated October 11, 2021.

Regards,

(b) (6)

**Morse, Brent (NIH/OD) [E]**

A3230-50  
New Case

**From:** Morse, Brent (NIH/OD) [E]  
**Sent:** Wednesday, June 16, 2021 10:33 AM  
**To:** (b) (6)  
**Cc:**  
**Subject:** RE: Self report

Thank you for this preliminary report, Troy. We'll open a case file and await the final report.

Best regards, Brent Morse

Brent C. Morse, DVM, DACLAM  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health

**From:** (b) (6)  
**Sent:** Tuesday, June 15, 2021 12:11 PM  
**To:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>  
**Cc:** (b) (6)  
**Subject:** Self report

Hi Brent,

At last week's IACUC meeting, the Committee determined that we should report an on-going NIH-supported incident. The PI self-reported to us that a former member of her lab decided on their own not to provide post-op care as was expected in the IACUC-approved in the protocol. We'll provide the details, including the resolution plan, in a letter in the coming weeks.

(b) (6)