



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) 402-7065

November 21, 2019

Re: Animal Welfare Assurance  
A3217-01 [OLAW Case 1C]

Ms. Tamara Deuser  
Associate Vice President  
Arizona State University  
660 South Mill Avenue, (b) (4)  
Tempe, AZ 85287-6111

Dear Ms. Deuser,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your November 15, 2019 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Arizona State University, following up on an initial report on June 21, 2019. According to the information provided, OLAW understands that two rats died after being given an incorrectly calculated anesthetic dose. In addition, the intended dose was not the one approved in the protocol. A total of four rats had been given the anesthetic, two survived, and all were lighter in weight than previous rats.

The corrective actions consisted of having the approved anesthetic dose listed on the bottle, posting a dose per weight chart in the procedure area, developing a standard operating procedure outlining laboratory activities, and having the Principal Investigator spend more time in the laboratory. The Institutional Animal Care and Use Committee (IACUC) recommended that the PI seek other institutional investigators as mentors.

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 institution to comply with the PHS Policy.

Sincerely,

(b) (6)

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

cc: IACUC Chair

November 15, 2019

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

Re: Report of Noncompliance under Animal Welfare Assurance #D16-00136

Research Facility: ISTB-1  
Species: *Rattus norvegicus*  
Principal Investigator: Wade Van Horn  
Funding Source: N/A - Unfunded  
Incident: Death of two rats following incorrect anesthesia dose

On June 14, 2019, a Van Horn lab member reported to the IACUC that during a routine procedure to implant transponders in four rats, two of the rats did not survive. The Chair and Attending Veterinarian met with the PI, and the cause of death was determined to be an incorrect calculation on the dose of anesthesia; a potential confounding factor was that all four rats were smaller in weight than what was usual. The two surviving rats had no symptoms of distress or negative effect from the procedure.

Following the meeting with the PI, the IACUC learned that the intended dose was not the dose approved in the protocol, and the PI was made aware of this during a follow-up meeting.

#### Corrective Action

The lab implemented the following steps to help ensure that this does not happen again:

- The IACUC-approved dose of ketamine per set weight of the animal will be listed on the bottle, rather than personnel having to do calculations at the time of administering the dose;
- A dose per weight chart will be posted in the procedure area for members to reference;
- A Standard Operating Procedure will be developed for the lab to use and reference when performing the procedures in the lab;
- Dr. Van Horn will be more present in the lab.

The IACUC reviewed the PI's Action Plan at the fully convened meeting on June 27, 2019. The committee voted on and approved the plan, and also recommended that the PI consult with other ASU animal researchers who could serve as mentors for the studies.

The lab has now implemented all steps of the Action Plan and there have been no subsequent issues with anesthesia. The committee feels that the PI has made an appropriate commitment to establishing sound practices that will benefit both animal welfare and compliant scientific study.

Please let us know if you have any questions.

Sincerely,

(b) (6)

Karen Kibler, PhD  
Chair, IACUC  
Assistant Research Professor

(b) (6)  
[Karen.Kibler@asu.edu](mailto:Karen.Kibler@asu.edu)

(b) (6)

Tamara Deuser, MBA, PMP  
Institutional Official  
Associate Vice President

(b) (6)  
[Tamara.Deuser@asu.edu](mailto:Tamara.Deuser@asu.edu)

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Thursday, November 21, 2019 6:44 AM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Preliminary Report under Assurance D16-00136 (A3217-01)

Thank you for this report. We will send a response soon.  
Axel Wolff

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**From:** (b) (6)  
**Sent:** Wednesday, November 20, 2019 5:05 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** iacuc@asu.edu; Tamara Deuser <Tamara.Deuser@asu.edu>; (b) (6)  
(b) (6) Karen Kibler  
<Karen.Kibler@asu.edu>  
**Subject:** RE: Preliminary Report under Assurance D16-00136 (A3217-01)

Hello Dr. Morse,

On behalf of the ASU IACUC, I am submitting the final report for the preliminary report initially submitted June 21, 2019.

If you have any questions, please contact [IAUCUC@asu.edu](mailto:IAUCUC@asu.edu).

Thank you,

(b) (6)

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**From:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Sent:** Monday, June 24, 2019 3:28 AM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** RE: Preliminary Report under Assurance D16-00136 (A3217-01)

Thank you for this preliminary report, (b) (6) We will start a new case file and look forward to receiving the final report from the IO after the IACUC has completed its investigation.

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

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**From:** (b) (6)  
**Sent:** Friday, June 21, 2019 6:30 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>

Cc: Tamara Deuser <Tamara.Deuser@asu.edu>; Karen Kibler <Karen.Kibler@asu.edu>; (b) (6)  
(b) (6)

**Subject:** Preliminary Report under Assurance D16-00136 (A3217-01)

Dear OLAW,

On behalf of the ASU IACUC, I am submitting a preliminary report of the death of two animals due to administration of an incorrect dose of medication. The IACUC is investigating and we will submit a final report on the outcome as soon as it is available.

Please let me know if you have any questions.

Thank you,

(b) (6)