



DEPARTMENT OF HEALTH & HUMAN SERVICES

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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

June 10, 2022

Re: Animal Welfare Assurance  
A3195-01 [OLAW Case 5G]

Dr. Mary Klotman  
Dean, School of Medicine and  
Vice Chancellor for Health Affairs  
Duke University Medical Center  
Duke South Clinic – 200 Trent Drive  
(b) (4) Davidson Building  
Durham, NC 27710

Dear Dr. Klotman,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your June 9, 2022 letter reporting a noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals that occurred at Duke University. Your letter supplements the information provided in the prompt, preliminary telephone report on June 2, 2022. According to the information provided, OLAW understands that on April 2, 2022, two mice were found moribund at a CO2 euthanasia station. Upon identification, the animals were humanely euthanized. After further investigation it was determined that there was a failure to ensure death after CO2 euthanasia. The mice were assigned to a PHS-funded project.

Corrective actions to prevent reoccurrence included:

1. The Principal Investigator and responsible individual met with animal program leadership (i.e., the Attending Veterinarian, the IACUC Chair, and/or their designees) to review the concern, the underlying cause, and corrective actions taken to prevent reoccurrence. This included a review of appropriate CO2 euthanasia and euthanasia confirmation procedures.
2. Hands-on re-training of the responsible individual on appropriate mouse CO2 euthanasia and euthanasia confirmation procedures.
3. Internal laboratory review and retraining of this item to help ensure understanding and prevent reoccurrence.

Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate this incident, correct the noncompliance, and prevent recurrence. OLAW concurs that the incident warranted reporting. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

**Brent C. Morse -S**

Digitally signed by Brent C.

Morse -S

Date: 2022.06.10 15:15:46 -04'00'

Brent C. Morse, DVM, DACLAM

Director

Division of Compliance Oversight

Office of Laboratory Animal Welfare

cc: IACUC contact  
Director OAWA



Duke University  
Durham, North Carolina 27705

Voice: 919.668.6720  
Fax: 919.668.6725  
<https://myresearchpath.duke.edu/topics/conduct-research-animals>

June 9, 2022

Duke University; Animal Welfare Assurance # D16-00123 (A3195-01)

Office of Laboratory Animal Welfare (OLAW)  
National Institutes of Health  
6700B Rockledge Drive, Suite 2500, MSC 6910  
Bethesda, MD 20892

Duke University, in accordance with PHS Policy IV.F.3., provides this report of an incident, which involved an animal activity conducted or supported with PHS-funds or other funds with OLAW oversight. This incident was reviewed and determined to be reportable by the Duke Institutional Animal Care & Use Committee (IACUC).

**Reportable requirement:** Failure to ensure death of animals after euthanasia procedures (e.g., failed euthanasia with CO<sub>2</sub>).

**Preliminary report:** A preliminary, verbal report was provided to Dr. Brent Morse on June 2<sup>nd</sup>, 2022 by Dr. Anna Hampton (Duke University Office of Animal Welfare Assurance Director and IACUC Chair).

**Number of animals affected:** 2 mice

**Date:** April 2, 2022

**Description, outcome, and actions taken:** Two mice were found moribund at a CO<sub>2</sub> euthanasia station. Upon identification, the animals were humanely euthanized. After further investigation it was determined that there was a failure to ensure death after CO<sub>2</sub> euthanasia.

Corrective actions to prevent reoccurrence included:

- The Principal Investigator and responsible individual met with animal program leadership (i.e., the Attending Veterinarian, the IACUC Chair, and/or their designees) to review the concern, the underlying cause, and corrective actions taken to prevent reoccurrence. This included a review of appropriate CO<sub>2</sub> euthanasia and euthanasia confirmation procedures.
- Hands-on re-training of the responsible individual on appropriate mouse CO<sub>2</sub> euthanasia and euthanasia confirmation procedures.
- Internal laboratory review and retraining of this item to help ensure understanding and prevent reoccurrence.

**Conclusion:** The Duke IACUC completed its investigation and performed final review of the issue at the May 26, 2022 IACUC meeting. The Duke IACUC determined that the incident was reportable to regulatory, granting, and oversight bodies, where applicable. In addition, the IACUC determined that the corrective actions were appropriate and no further actions were necessary. The Duke IACUC considers this incident closed.

This item was reported to Duke grants management to ensure compliance with the terms and conditions of the grant award.



Duke University  
Durham, North Carolina 27705



Office of Animal Welfare Assurance  
Campus Mail: Hock Plaza Box 2724  
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Voice: 919.668.6720  
Fax: 919.668.6725

<https://myresearchpath.duke.edu/topics/conduct-research-animals>

The Duke University 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 Anna Hampton, DVM, IACUC Chair at [Anna.Hampton@Duke.edu](mailto:Anna.Hampton@Duke.edu) or (b) (6)

Thank you for your consideration of this matter.

Sincerely,

(b) (6)

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Dr. Mary E. Klotman  
Duke University  
Dean, School of Medicine  
Vice Chancellor for Health Affairs  
Institutional Official

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, June 10, 2022 7:54 AM  
**To:** Anna Hampton  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Duke OLAW Report (Assurance # A3195-01)

Thank you for these reports, Dr. Hampton. We will send a response shortly.

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

**From:** Anna Hampton <anna.hampton@duke.edu>  
**Sent:** Thursday, June 9, 2022 3:27 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** [EXTERNAL] Duke OLAW Report (Assurance # A3195-01)

Dear OLAW,

Please see the attached final reports for Duke University (Assurance # A3195-01 / D16-00123).

Please do not hesitate to contact me if you have any questions or need additional information.

Anna

Anna Hampton, DVM, DACLAM, DACAW, CPIA  
Director, Office of Animal Welfare Assurance  
Chair, Institutional Animal Care and Use Committee  
Duke University  
2424 Erwin Road, (b) (4)  
Durham, NC 27705

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[Duke Animal Program Website](#)

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## Initial Report of Noncompliance

By: BCM

Date: 6/2/2022

Time: 1:45

Person Reporting: Anna Hampton, DVM

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: Duke Univ.

Assurance number: A3195

Did incident involve PHS funded activity? ?

Funding component:

Was funding component contacted (if necessary):

What happened: Two mice survived CO2 euthanasia attempt since no secondary method was used. Mice found next morning on table, under euthanasia chamber lid, then properly euthanized.

Species involved: Mus musculus

Personnel involved: ?

Dates and times: April 2, 2022

Animal deaths: euthanized

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

Projected submission to OLAW of final report from Institutional Official:

< 60 days

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Case #