



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

March 2, 2022

Re: Animal Welfare Assurance
#A3226-01 (OLAW Case 2V)

Dr. Frederick Applebaum
Executive VP and Deputy Director
Fred Hutchinson Cancer Research Center
1101 Fairview Avenue North
Seattle, WA 98109-1024

Dear Dr. Applebaum,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your letter dated February 11, 2022 reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Fred Hutchinson Cancer Research Center. Your letter supplements the information in the prompt telephone preliminary report on December 16, 2021. According to the information provided, OLAW understands that on December 10, 2021, two cages of mice were found with incomplete post-operative monitoring cage card records, and the mice appeared to be nearing humane endpoints. On physical exam, the mice were lethargic and hunched and became increasingly unresponsive to stimuli over the course of the evaluation. Both mice were immediately euthanized. It was subsequently determined that the mice had received an unapproved surgical procedure on December 9, 2021. The surgery performed on these NSG mice was only approved for subcutaneous placement of the scaffold, not for a laparotomy. The associated protocols are not PHS-supported.

The Principal Investigator confirmed that the unapproved activity was immediately stopped. The Principal Investigator also reminded all study personnel of the post-operative monitoring and documentation requirements, and the specific researcher involved was counseled by a clinical veterinarian on post-operative monitoring and documentation. The researcher also met with a regulatory veterinarian to discuss the approved IACUC protocol, emphasizing that procedures on live animals must be performed exactly as they are described in the protocol.

The IACUC directed the following additional corrective actions:

1. The researcher must repeat the Comparative Medicine hands-on training course "Rodent Anesthesia and Aseptic Surgery Technique." The purpose of the repeat training is to emphasize post-operative monitoring expectations, record-keeping, and how to use the standard post-operative cage cards.
2. The Principal Investigator and the entire research team must meet with CM clinical and regulatory veterinarians to verify that all animal users have access to the electronic protocol system and to confirm the research team's familiarity with the approved procedures on the IACUC protocol.

Based on the information provided, OLAW is satisfied that appropriate actions have been taken by the Fred Hutchinson Cancer Research Center to investigate this incident, provide corrective measures, and prevent recurrence. OLAW concurs that the incident warranted reporting. Although this activity was not PHS funded, the application of the expectations of the PHS Policy across the animal care and use program reduces any potential appearance of a double standard. We appreciate being informed of this matter and find no cause for further action by this office.

Page 2 ~ Dr. Applebaum
March 2, 2022
OLAW Case A3226-2V

Sincerely,

Brent C. Morse -S

Digitally signed by Brent C. Morse -
S
Date: 2022.03.02 07:47:58 -05'00'

Brent C. Morse, DVM

Director

Division of Compliance Oversight

Office of Laboratory Animal Welfare

cc: IACUC contact



February 11, 2022

Brent Morse, DVM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare (OLAW)
National Institutes of Health
6700B Rockledge Drive, Suite 2500, MSC 6910
Bethesda, MD 20892

RE: Reportable Event

Animal Welfare Assurance Number:	D16-00142 (Legacy #A3226-01)
Name of Institution:	Fred Hutchinson Cancer Research Center
PHS Funding:	No PHS Funding for this project

Dear Dr. Morse:

This letter serves as follow-up to an initial verbal notification made by (b) (6) on December 16, 2021, regarding a reportable event.

The Fred Hutchinson Cancer Research Center (Fred Hutch) Institutional Animal Care and Use Committee (IACUC) initially reviewed the reportable event at the January 4, 2022 IACUC meeting. The report was submitted on December 15, 2021 and described an event involving two mice that had received an unapproved surgical procedure on December 9, 2021.

On December 10, 2021, Comparative Medicine (CM) staff discovered two cages of mice had incomplete post-operative monitoring cage card records, and the mice appeared to be nearing humane endpoints. On physical exam, the mice were lethargic and hunched and became increasingly unresponsive to stimuli over the course of the evaluation. Both mice were immediately euthanized.

A review of the IACUC protocol revealed that the laparotomy with scaffold insertion procedure that had been done on these NSG mice was not in the IACUC-approved protocol. The use of alginate scaffolds was approved on the IACUC protocol, but only for subcutaneous placement and not in GVHD model mice (GVHD model mice are approved for other projects on the protocol).

The Principal Investigator confirmed that the unapproved activity was immediately stopped. The Principal Investigator also reminded all study personnel of the post-operative monitoring and documentation requirements, and the specific researcher involved was counseled by a clinical veterinarian on post-operative monitoring and documentation. The researcher also met with a regulatory veterinarian to discuss the approved IACUC protocol, emphasizing that procedures on live animals must be performed exactly as they are described in the protocol.

At the January 4, 2022, convened IACUC meeting, the Committee reviewed the event and the corrective actions that had already been taken. The Committee directed the following additional corrective actions:

1. The researcher must repeat the Comparative Medicine hands-on training course "Rodent Anesthesia and Aseptic Surgery Technique." The purpose of the repeat training is to emphasize post-operative monitoring expectations, record-keeping, and how to use the standard post-operative cage cards.
2. The Principal Investigator and the entire research team must meet with CM clinical and regulatory veterinarians to verify that all animal users have access to the electronic protocol system and to confirm the research team's familiarity with the approved procedures on the IACUC protocol.

All corrective actions were completed prior to the 2/1/2022 IACUC meeting. These corrective actions, along with the Principal Investigator's response, were reviewed at the 2/1/2022 meeting and the IACUC determined no further action was required.

If you have any suggestions for further improvements to our program, please do not hesitate to share them with us. If I can be of any further assistance, please contact me at (b) (6) or fappelba@fredhutch.org.

Sincerely,

(b) (6)

Fred Appelbaum, MD
Executive Vice President & Deputy Director
Fred Hutchinson Cancer Research Center

cc:

(b) (6)

A McGarry Houghton, IACUC Chair
Gordon Roble, DVM, Attending Veterinarian
Principal Investigator
Fred Hutch Office of General Counsel

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Friday, February 18, 2022 8:29 AM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: OLAW reporting letter_ D16-00142-Legacy #A3226-01-Fred Hutchinson Research Center

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

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

From: (b) (6)
Sent: Wednesday, February 16, 2022 5:26 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: (b) (6)
Subject: [EXTERNAL] OLAW reporting letter_ D16-00142-Legacy #A3226-01-Fred Hutchinson Research Center

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 Dr. Morse:

Attached please find the final report as follow-up to an initial verbal notification that was provided on December 16, 2021 regarding a reportable event.

If you have any questions, please contact me. We would appreciate a confirmation via email that you have received the attached document.

Sincerely,

(b) (6)

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A3226-2V

Initial Report of Noncompliance

By: BCM

Date: 12/22/2021

Time: voicemail

Name of Person reporting: (b) (6)

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: Fred Hutchinson Cancer Rsch Cen

Assurance number: A3226

Did incident involve PHS funded activity? No

Funding component:

Was funding component contacted (if necessary):

What happened?

Two mice underwent abdominal survival surgery that was not approved on protocol. Surgery was approved on a different protocol but on for subcutaneous implant, not abdominal.

Species involved: mus musculus

Personnel involved: Researcher

Dates and times: ?

Animal deaths:

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

IACUC investigating

Projected submission to OLAW of final report from Institutional Official:

< 60 days

OFFICE USE ONLY

Case #