



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

April 25, 2022

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

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 April 12, 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 March 3, 2022. According to the information provided, OLAW understands that a Principal Investigator had requested that a veterinary technician collect blood via retro-orbital draw from five live mice without realizing that this collection technique was not approved on the IACUC protocol. The associated protocol is not PHS-supported.

Corrective and preventive measures included approving a protocol amendment adding retro-orbital blood collection to the IACUC protocol. Additional corrective and preventative actions included discussing the event with all veterinary technicians and emphasizing the importance of confirming that requested procedures are approved on investigators' IACUC protocols before performing them.

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. We appreciate being informed of this matter and find no cause for further action by this office.

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: 2022.04.26 10:30:39 -04'00'

cc: IACUC contact

A3226-



**FRED HUTCH**  
Institutional Review Office

April 12, 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**

<b>Animal Welfare Assurance Number:</b>	D16-00142 (Legacy #A3226-01)
<b>Name of Institution:</b>	Fred Hutchinson Cancer Center
<b>PHS Funding:</b>	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 March 3, 2022, regarding a reportable event.

On April 5, 2022, the Fred Hutchinson Cancer Center (Fred Hutch) Institutional Animal Care and Use Committee (IACUC) reviewed a reportable event submitted on March 3, 2022. The report described an event in which an unapproved blood draw procedure was performed. The Principal Investigator had requested that a Comparative Medicine (CM) veterinary technician collect blood via a cardiac puncture on a recently euthanized mouse; however, when the technician arrived, a necropsy was already in progress and blood was unable to be collected by that method. The investigator requested that blood be collected instead by retro-orbital draw from live mice (5 total) without realizing that this collection technique was not approved on the IACUC protocol.

The Committee reviewed the event at the April 5, 2022 fully convened IACUC meeting. Retro-orbital blood collection was added to the IACUC protocol via an amendment and was approved on March 16, 2022. Additional corrective and preventative actions included discussing the event with all veterinary technicians and emphasizing the importance of confirming that requested procedures are approved on investigators' IACUC protocols before performing them. It was also noted that veterinary technician service requests typically require 24-hour advance notice to allow sufficient time for IACUC protocol verification.

The IACUC determined the corrective and preventative action plan was adequate, and 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](mailto:fappelba@fredhutch.org).

Sincerely,

(b) (6)

Fred Appelbaum, MD  
Executive Vice President & Deputy Director  
Fred Hutchinson Cancer 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]**

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Monday, April 18, 2022 7:25 AM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: OLAW reporting letter\_ D16-00142-Legacy #A3226-01-Fred Hutchinson Cancer 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:** Friday, April 15, 2022 2:26 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 Cancer Center

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Dear Dr. Morse:

Attached please find the final report as follow-up to an initial verbal notification provided on March 3, 2022 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.

Best,

(b) (6)

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A3226-24



## Initial Report of Noncompliance

By: BCM

Date: 3/3/2022

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?

Authorized retro-orbital blood collection performed on five mice by Vet Tech.

Species involved: mus musculus  
Personnel involved: Vet Tech  
Dates and times: ?  
Animal deaths:

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

IACUC investigating. Protocol revised to add this method of blood collection.

Projected submission to OLAW of final report from Institutional Official:

< 60 days

OFFICE USE ONLY  
Case #