



## DEPARTMENT OF HEALTH &amp; HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTHFOR 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): <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  
Faximile: (301) 480-3387

June 30, 2022

Re: Animal Welfare Assurance  
A3224-01 [OLAW Case 1R]

Dr. Erin Kobetz  
Vice Provost for Research  
University of Miami  
1400 NW 10<sup>th</sup> Ave -  
**(b) (4)** Dominion Towers  
Miami, FL 33136

Dear Dr. Kobetz,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your letter (received June 10, 2022 via email correspondence) reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of Miami Miller School of Medicine. This letter had not been preceded by a preliminary report to OLAW.

According to the information provided, this Office understands that the University of Miami Miller School of Medicine Animal Care and Use Committee (ACUC) determined that instances of noncompliance occurred with respect to: use of an improper and unapproved method of euthanasia on an animal. The final report states the IACUC determined a mouse was euthanized by a method that compromised the welfare of the animal, which was also not an approved or proper method of euthanasia. The Principal Investigator (PI) determined a staff member was responsible for the incident and the individual ceased animal work, pending the outcome of an investigation.

Per the report, the IACUC voted to have the entire lab undergo additional training on euthanasia techniques. The PI and the staff member were mandated to meet separately with the Director of Compliance and the IACUC Chair to discuss the seriousness of this event and the importance of using appropriate techniques. They were informed that any future protocol or policy violations may result in serious consequences.

In response to the incident, the PI and the entire research team must perform self-PAMs (post-approval monitoring), which means the team must review the research to verify that it fully complies with the protocols and that no policies have been violated. It is understood that following completion of training and the mandated meeting, the staff member was permitted to resume work with animals. It is also understood that self-PAMs are ongoing.

It is noted that this research is supported by NIH funding. Based on its assessment of this explanation, OLAW understands that the University of Miami Miller School of Medicine has implemented appropriate measures to correct and prevent recurrences of these problems and is now compliant with provisions of the PHS Policy.

We appreciate being informed of these matters and find no cause for further action by this Office.

*Page 2 – Dr. Kobetz  
June 30, 2022  
OLAW Case A3224-IR*

Sincerely,

**Jacquelyn  
T. Tubbs -S**

Digitally signed by Jacquelyn T.  
Tubbs-S  
Date: 2022.06.30 15:31:38 -04'00'

Jacquelyn Tubbs, DVM, DACLAM  
Senior Animal Welfare Program Specialist  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare

cc: IACUC Contact

**McCoy, Devora (NIH/OD) [E]**

---

**From:** McCoy, Devora (NIH/OD) [E]  
**Sent:** Thursday, June 30, 2022 4:46 PM  
**To:** ekobetz@med.miami.edu  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD); (b) (6)  
**Subject:** OLAW Case A3224-1R  
**Attachments:** SIGNED Compliance Case University of Miami Miller School of Medicine 1R.pdf

Good afternoon Dr. Kobetz,

Attached please find Dr. Tubbs' final response to OLAW Case A3224-1R. If you have any questions, feel free to contact us by phone or by e-mail.

Best,  
Devora

Devora McCoy, BS, MBA  
Program Analyst  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
301-435-2390



OFFICE OF THE VICE PROVOST FOR  
RESEARCH & SCHOLARSHIP

A3224-IR

Dr. Axel Wolff, Deputy Director  
Office of Laboratory Animal Welfare  
Rockledge One, Suite 2500  
6700B Rockledge Drive – MSC 6910  
Bethesda, MD 20892-7982

Re: NIH project R01DA047157  
Assurance number: A3224-01

Dear Dr. Wolff,

I am writing to inform the OLAW of a serious noncompliance in an animal research program at the University of Miami Miller School Of Medicine.

During a semi-annual inspection, the IACUC determined that a mouse had been euthanized using an improper and unapproved method that compromised the welfare of the animal. The PI responded immediately to the IACUC that he had determined this had been done by a staff member.

The PI agreed to have the staff member immediately stop working with animals pending the outcome of an investigation by the IACUC.

The IACUC discussed this issue at length and voted to have the entire lab undergo additional training on euthanasia techniques. In addition, the PI and the staff member were mandated to meet individually with the Director of Compliance and the IACUC Chair to discuss the seriousness of this event and the importance of using appropriate techniques. During those meetings, both the PI and staff member were very cooperative and appeared to understand the gravity of what had been done. Further, they are aware that any future violations of protocol or policy could result in extremely serious consequences for this research program.

In addition, the PI and entire research team must conduct self-PAMs (post approval monitoring) on all of their protocols each month for 6 months after their training had been completed and reports detailing the outcomes must be reported to the IACUC each month. What this means is that the entire team must review the research to ensure that it fully complies with the protocols and that no policies have been violated. In the past, we have found that this method of having labs conduct PAMs of their own work has greatly enhanced their understanding of what is approved and thus has increased compliance in labs that have done this.

Following completion of training and meeting with the Director of Compliance and the IACUC Chair, the staff member has been allowed to resume working with animals. The PI understands the seriousness of this event and has promised to exert greater oversight over everything happening in the lab to prevent future noncompliance. The self-PAMs are ongoing.



OFFICE OF THE VICE PROVOST FOR  
RESEARCH & SCHOLARSHIP

I agree with the recommendations of the IACUC, and I have taken steps to see that they are implemented going forward. I consider the issue resolved and closed. At the University of Miami, we strive to take excellent care of our animals and we are confident that no additional noncompliance will occur with this research team.

Sincerely,

(b) (6)

Erin Kobetz, PhD, MPH  
Vice Provost for Research and Scholarship  
Associate Director, Population Sciences and Cancer Disparity,  
Sylvester Comprehensive Cancer Center  
Professor, Medicine and Public Health Sciences

cc:

(b) (6)

Dr. Sari Izenwasser, IACUC Chair



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

---

**From:** Wolff, Axel (NIH/OD) [E]  
**Sent:** Monday, June 13, 2022 8:42 AM  
**To:** Izenwasser, Sari  
**Subject:** RE: Noncompliance report

Thank you for this report, Dr. Izenwasser. We will send a response shortly. In future, please submit all final reports to [olawdco@od.nih.gov](mailto:olawdco@od.nih.gov) so that OLAW staff can process them even when I am not available.

Axel Wolff

**From:** Izenwasser, Sari <[sizenwasser@med.miami.edu](mailto:sizenwasser@med.miami.edu)>

**Sent:** Friday, June 10, 2022 5:32 PM

**To:** Wolff, Axel (NIH/OD) [E] <[wolffa@od.nih.gov](mailto:wolffa@od.nih.gov)>

**Cc:** Kobetz, Erin <[ekobetz@med.miami.edu](mailto:ekobetz@med.miami.edu)>; (b) (6)

(b) (6)

**Subject:** [EXTERNAL] Noncompliance report

Dear Dr. Wolff

Attached please find a letter from the University of Miami reporting noncompliance on an NIH-funded project. Please let us know if you have any questions.

Best,

Sari

Sari Izenwasser, Ph.D.  
Professor  
Department of Psychiatry & Behavioral Sciences  
University of Miami Miller School of Medicine  
Miami, FL 33136  
(b) (6)

**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.