



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

January 28, 2022

Re: Animal Welfare Assurance
#A3343-01 (OLAW Case 3C)

Dr. Giulio Draetta
Chief Scientific Officer
University of Texas MD Anderson Center
1515 Halcombe Boulevard – (b) (4)
Houston, Texas 77030

Dear Dr. Draetta,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your letter dated January 14, 2022 reporting a noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of Texas MD Anderson Cancer Center. According to the information provided, OLAW understands that on November 3, 2021, an animal manipulator was using a CO2 chamber and/or failed to confirm euthanasia by following-up with a secondary method. One of the mice eventually revived after the CO2 euthanasia procedure. A veterinarian then immediately euthanized the live mouse. The veterinarian then performed a secondary method of euthanasia on the remaining mice in the carcass freezer. The associated activity was PHS-funded. The costs associated with the maintenance and care of the animals during the period of noncompliance that were initially charged to the grant have been removed. The NIH funding component has been notified.

As corrective and preventive actions, the manipulator was immediately counseled and trained on proper CO2 euthanasia with a secondary method. IACUC Post-Approval Monitors visited the lab to review the protocol including approved euthanasia methods with the PI and animal manipulators and IACUC SOP *Rodent Euthanasia and Death Endpoints*.

The prompt consideration of this difficult matter by the University of Texas MD Anderson Cancer Center was consistent with the philosophy of institutional self-regulation. Similarly, the actions taken to resolve the issue and prevent recurrence were appropriate. 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: 2022.01.28 17:01:52 -05'00'

Brent C. Morse, DVM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC contact

January 14, 2022

VIA ELECTRONIC SUBMISSIONolawdco@mail.nih.gov

Brent C. Morse, DVM, DACLAM
Director, 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: Reportable Incident; Animal Assurance # A3343-01
MDA internal reference # HSK3-1122-001
Funding: NCI 5U54CA224065-04 (FP00001549A)

Dear Dr. Morse,

I am writing to provide a report of The University of Texas MD Anderson Cancer Center (MD Anderson) Institutional Care and Use Committee's (IACUC) finding of serious noncompliance with the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy). A full explanation of the circumstances of this serious non-compliance as well as actions taken and planned is provided below.

A report of failure to confirm euthanasia.

On November 3, 2021, an animal manipulator failed to confirm euthanasia. The manipulator was performing facial bleeds on multiple mice followed by euthanasia using CO2 chamber and did not follow up with a secondary method of euthanasia. One of the mice eventually awoke after the CO2 euthanasia procedure. Another researcher in the animal procedure room notified the animal manipulator that performed the CO2 euthanasia that one of the mice presumed dead was still moving. The animal manipulator dismissed the concern and deposited the carcasses in the freezer. A Department of Veterinary Medicine and Surgery (DVMS) clinical veterinarian heard of the concern and removed the bags from the freezer discovering a live mouse in a carcass bag with other euthanized mice. The veterinarian transferred the 43 mice to the procedure room and immediately euthanized the live mouse. The veterinarian then performed a secondary method of euthanasia on the remaining mice.

As corrective actions, the manipulator was immediately contacted by DVMS, counseled and trained on proper euthanasia technique and requested by DVMS training on for CO2 euthanasia with a secondary method on November 5, 2021. The animal manipulator will not perform any euthanasia procedures and will be accompanied to the animal facility by a senior laboratory member until this training is complete. IACUC Post Approval Monitors visited the lab on December 2, 2021 to review the protocol including approved euthanasia methods with the PI and animal manipulators and IACUC SOP 3.10 *Rodent Euthanasia and Death Endpoints*.

The IACUC reviewed the incident and the corrective and preventive action at its fully convened meeting on November 16, 2021 and agreed that the corrective and preventive action was sufficient to prevent any future recurrence of the above-listed non-compliance with the PHS Policy.

The costs associated with the maintenance and care of the animals during the period of noncompliance that were initially charged to NCI grant 1RO1CA20731-01A1 have been removed from such grant. The NIH funding component has been notified.

MD Anderson is committed to assuring compliance with the PHS policy and the Guide, and to maintaining proper measures and procedures to ensure the appropriate care and use of all animals involved in research. I will be happy to respond to any additional questions you may have regarding this report.

Regards,

(b) (6)

Giulio Draetta, M.D., Ph.D.
Sr. Vice President, Chief Scientific Officer
MD Anderson Cancer Center
1515 Holcombe Blvd.

(b) (4)

Houston, TX 77030

(b) (6)

cc: Patrick Dougherty, Ph.D., IACUC Chair

(b) (6)

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Wednesday, January 19, 2022 7:06 AM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: MD Anderson Cancer Center (A3343-01) HSK3-1122-001

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, January 14, 2022 10:49 AM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Dougherty, Patrick <pdougherty@mdanderson.org>; (b) (6)
Subject: [EXTERNAL] MD Anderson Cancer Center (A3343-01) HSK3-1122-001

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.

Please find attached our final report for an incident that occurred at MD Anderson Cancer Center (A3343-01). Please contact me if you have any questions.

Thank you,

(b) (6)

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