



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

August 29, 2022

Re: Animal Welfare Assurance  
A3823-01 [OLAW Case 10F]

Dr. Mary Dickinson  
Senior Vice President and Dean of Research  
Baylor College of Medicine- Houston  
One Baylor Plaza, MS BCM335  
Houston, TX 77030

Dear Dr. Dickinson,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your August 26, 2022 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Baylor College of Medicine. According to the information provided, OLAW understands that three separate cages housing mice in overcrowded conditions were found in an automated euthanasia chamber. There was no evidence that the mice had fought one another, and the euthanasia procedure was completed appropriately.

The corrective actions consisted of retraining the research staff involved on the correct conduct of euthanasia.

Based on its assessment of this explanation, OLAW understands that measures have been implemented to prevent recurrence of this problem. OLAW concurs with the actions taken by the institution to comply with the PHS Policy.

Sincerely,

(b) (6)

Axel Wolff, M.S., D.V.M.  
Deputy Director  
Office of Laboratory Animal Welfare

cc: IACUC Chair



**OFFICE OF RESEARCH**

One Baylor Plaza, BCM310  
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**CONFIDENTIAL**

August 26, 2022

Brent Morse, DVM, DACLAM  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
olawdco@mail.nih.gov

RE: Assurance #D16-00475

Dear Dr. Morse,

As Institutional Official for Baylor College of Medicine (BCM), I have the duty to inform you of our Institutional Animal Care and Use Committee's (IACUC) recent findings in animal research after an assessment of the following protocol:

**Protocol:** AN-5896: Knockout Mouse Phenotyping Program (KOMP2) Mouse Model Production and Phenotyping Pipeline  
**Species:** Mice

**Funding Sources:** National Institutes of Health (NIH): UM1-HG006348 and Non-PHS Funding

For this investigator's first incident of this nature, the IACUC determined that the following finding constituted *serious noncompliance*<sup>i</sup> with the federal regulations:

*5/31/2022 – Mice were euthanized in overcrowded conditions*<sup>ii</sup>

During the daily verification of euthanasia, three separate cages containing 15, 17 and 18 mice less than 6-weeks of age were found in the automated euthanasia chamber. The mice did not exhibit any wounds or fight marks and the carcasses were disposed of properly.

*8/9/2022 – Determination at a fully convened IACUC meeting*

To protect the welfare of animals and prevent future recurrence, the IACUC required following corrective actions:

1. All research personnel are required to complete the interactive "Top 10 Pitfalls in Animal Research and how to Avoid Them" training.
2. All research personnel are required to review the "Euthanasia in Rodents" IACUC policy, which was recently reviewed and updated by the IACUC.

<sup>i</sup> PHS Policy IV.F.3.a: "The IACUC, through the Institutional Official, shall promptly provide OLAW with a full explanation of the circumstances and actions taken with respect to: a. any serious or continuing noncompliance with this Policy;"

<sup>ii</sup> PHS Policy IV.C.1.g: "Methods of euthanasia used will be consistent with the recommendations of the American Veterinary Medical Association (AVMA) Panel on Euthanasia, unless a deviation is justified for scientific reasons in writing by the investigator."

ii AVMA p. 19: "When possible, inhaled agents should be administered under conditions where animals are most comfortable...If animals need to be

This finding of non-compliance does not appear to pose any potential or actual effect on costs related to this PHS-supported research.

This notification will also be sent to AAALAC International, the National Institutes of Health and the non-PHS funding source according to the terms and conditions of the award.

Please do not hesitate to contact me if you have any questions.

Sincerely,

(b) (6)

Mary E. Dickinson, Ph.D.  
Sr. Vice President and Dean of Research  
Institutional Official  
Baylor College of Medicine

cc: Principal Investigator  
Department Chair  
Research Compliance Services files

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

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**From:** (b) (6)  
**Sent:** Friday, August 26, 2022 4:47 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** (b) (6)  
**Subject:** [EXTERNAL] OLAW Reports- Assurance D16-00475  
**Attachments:** OLAW Notification D16-00475 AN-6102 signedMD.pdf; OLAW Notification D16-00475 CCM signedMD.pdf; OLAW Notification D16-00475 AN-8015 signedMD.pdf; OLAW Notification D16-00475 AN-5896 signedMD.pdf; OLAW Notification D16-00475 AN-8678 signedMD.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Dr. Morse,

Please find the attached notifications of research non-compliance as determined by our IACUC, and sent on behalf of Dr. Mary Dickinson, Institutional Official.

Please feel free to contact me if you have any questions.

Thank you,

(b) (6)

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