



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

December 9, 2022

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

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 November 28, 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 32 mice had been grouped together in one cage awaiting euthanasia.

The corrective action consisted of separating the mice and appropriately euthanizing them. All laboratory staff was retrained in the procedures surrounding euthanasia activities and were apprised of the relevant institutional policies covering this topic.

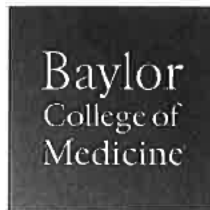
Based on its assessment of this explanation, OLAW understands that measures have been implemented to correct and prevent recurrence of this problem. OLAW concurs with the actions taken by the institution to comply with the PHS Policy.

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
Houston, Texas 77030-3411

(713) 798 – 2104
(713) 798 – 2721 FAX
mdickins@bcm.edu

CONFIDENTIAL

November 28, 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-2099: Molecular Regulation of Immunity to Viral Infections and Regulation of Immune Responses by Apoptosis and Autophagy

Species: Mice

Funding Sources: National Institute of General Medical Sciences (NIGMS): R01-GM067848 and Non-PHS Funding

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

*7/27/2022 – Mice were presented for euthanasia in an overcrowded*ⁱⁱ

One cage containing 32 mice was found by central animal care personnel on a rack for an automated euthanasia station. The mice were separated by facility staff and euthanized appropriately.

11/8/2022 – 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 be re-trained in euthanasia and procedures for using the automated euthanasia system.
2. All research personnel are required to review the policy "Euthanasia in Rodents."

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

ⁱ 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;"

ⁱⁱ 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 notification will also be sent to AAALAC International, the National Institute of General Medical Sciences 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 Dickinson, PhD
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]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Tuesday, November 29, 2022 12:49 PM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: OLAW Reports- Assurance D16-00475

Good afternoon (b) (6)

Thank you for sending us these three reports and we will send official responses soon.

Best,
Devora

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

From: (b) (6)
Sent: Tuesday, November 29, 2022 10:38 AM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: (b) (6)
Subject: [EXTERNAL] OLAW Reports- Assurance D16-00475

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)

