



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

March 10, 2023

Re: Animal Welfare Assurance
#A3213-01 (OLAW Case 2L)

Dr. Kathryn Moler
Vice Provost and Dean of Research
Stanford University
1705 El Camino Real, MC 5579
Palo Alto, CA 94306

Dear Dr. Moler,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your February 28, 2023 letter reporting a serious deviation from the provisions of the *Guide for the Care and Use of Laboratory Animals* at Stanford University, following up on an initial telephone report on October 6, 2022. According to the information provided, OLAW understands that two mice were separated due to fighting but food had not been placed in the new cages and both animals died. The problem was not identified during the daily health check.

The corrective actions consisted of counseling the animal care staff involved on the appropriate conduct of health checks and cage setups. All husbandry staff has been retrained on conducting daily health checks and on ensuring that all animals have food/water. Step stools will be available in housing rooms to allow visualization of animals on top shelves of racks and cloudy cages will be replaced.

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 on Humane Care and Use of Laboratory Animals.

Sincerely,

(b) (6)

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

cc: IACUC Chair

Stanford | RESEARCH

Vice Provost and Dean of Research

Kathryn A. Moler, Ph.D.

Vice Provost and Dean of Research

Marvin Chodorow Professor

Professor of Applied Physics and of Physics

e-mail: kmoler@stanford.edu

(b) (6)

Confidential

February 28, 2023

Brent Morse, DVM, DACLAM
 Director of Compliance Oversight
 Office of Laboratory Animal Welfare
 Division of Compliance Oversight
 National Institutes of Health
 6705 Rockledge Drive
 RKL 1, Suite 360 MSC 7982
 Bethesda, MD 20892-7982

Dear Dr. Morse:

As Stanford University's authorized institutional official under its PHS Assurance (Animal Welfare Assurance #A3213-01), I am writing to notify OLAW of a reportable incident as defined in PHS Policy IV.F.3.

IACUC determination	Serious noncompliance
Funding	National Institutes of Health

Description:

At a convened meeting, the IACUC discussed an allegation of noncompliance involving rodents. Two aggressive mice were separated from their cages of origin and placed into new cages. The new cages were set up with water but food was inadvertently not provided. Both mice were found dead several days later. The APLAC determined that this incident met the definition of serious noncompliance as it constituted a failure to adhere to the PHS "Policy on Humane Care and Use of Laboratory Animals" and resulted in actual harm to animals.

These animals were purchased under an approved IACUC protocol that included NIH funding; however, the animals were experimentally naïve and all costs associated with these animals have been refunded.

A preliminary report of this incident was provided to OLAW on October 6th, 2022, via a telephone call from the Associate Director of the Institutional Animal Care and Use Program, Research Compliance Office. The discussion confirmed that this was a husbandry event and did not involve the research investigator.

Dr. Brent Morse
February 28, 2023

IACUC Determination:

An IACUC subcommittee met to review these concerns and the corrective actions that had been taken. Based on its review, the subcommittee recommended that this incident be classified as serious noncompliance as it constituted a failure to adhere to the PHS "Policy on Humane Care and Use of Laboratory Animals".

At the convened meeting, the IACUC discussed the subcommittee's recommendation. A motion to accept this finding was made, seconded and approved. A determination memo from the IACUC Chair has been sent to the Associate Director (AD) of the Veterinary Service Center (VSC).

Corrective Actions and Follow up:

The AD reported that the following had been done proactively:

- They have met with all involved caretakers and technicians to discuss this issue and have briefed them on the importance of following all relevant SOPs regarding health checks and cage setups.

The IACUC requested that in addition to this corrective action that:

- All VSC animal care employees that perform daily health checks will undergo a focused retraining by their husbandry supervisors in the facility in which they work. A roster of attendees will be provided to the IACUC.
- All veterinary technicians and animal care technicians will undergo training with their supervisor regarding the confirmation of cage set-ups which will include ensuring the provision of food and water. A roster of attendees will be provided to the IACUC.
- All VSC housing rooms that do not now have an appropriate step stool will be provided with one in order to easily access cages on higher shelves.
- All VSC housing room in which static cages are used will have these cages evaluated for opacity and they will be replaced as needed in order to ensure that animals (and food) can be easily assessed during room checks.

Concluding Remarks:

The IACUC has carefully reviewed this incident with all parties involved. Stanford believes that a recurrence of an incident of this nature is unlikely as all VSC members have received appropriate training, and the AD and VSC staff are committed to preventing a future occurrence. Please contact me or (b) (6) if you have any questions or need additional information.

Sincerely,

(b) (6)

Kathryn A. Moler, PhD
Vice Provost and Dean of Research

cc:

(b) (6)

McCoy, Devora (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Friday, March 3, 2023 3:12 PM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: OLAW Notification for PHS Assured Institution #A3213-01

Good afternoon (b) (6)

Thank you for sending us this report and we will send an official response soon.

Best,
Devora

Devora McCoy, BS, MBA ([pronunciation](#))
Program Analyst
Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health

Phone: 301-435-2390
Email: devora.mccoy@nih.gov

From: (b) (6)
Sent: Friday, March 3, 2023 2:50 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Subject: [EXTERNAL] OLAW Notification for PHS Assured Institution #A3213-01

Dear Dr. Morse -

On behalf of Stanford University's Institutional Official, I am writing to notify OLAW of a serious noncompliance. Please see the attached document.

Feel free to contact me if you have any questions or concerns.

Best,
(b) (6)



A3213-22



Initial Report of Noncompliance

By: (b) (6)

Date: 10/6/22

Time: 12⁰⁰

Name of Person reporting: (b) (6)

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: Stanford U

Assurance number: A3213

Did incident involve PHS funded activity? Yes

Funding component: _____

Was funding component contacted (if necessary): _____

What happened?

Mice separated due to fighting, separated but no food in cage, 2 died. Not caught by caretakers.

Species involved: Mice

Personnel involved: _____

Dates and times: _____

Animal deaths: 2

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

Counsel caretakers

Projected submission to OLAW of final report from Institutional Official: _____

OFFICE USE ONLY

Case # _____