



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

May 10, 2023

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

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 April 27, 2023 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Stanford University, following up on an initial telephone report on December 8, 2022. According to the information provided, OLAW understands that due to human error a hamster escaped its cage and became stuck in an insect trap on the floor.

The immediate action taken upon discovery consisted of assessing the animal's condition and then euthanizing it. The corrective actions consisted of counseling and retraining the laboratory staff on the correct manner to manipulate cages, installing a new door sweep, relocating insect traps from inappropriate areas, and ensuring that the insect traps in use are not big enough to trap rodents. Laboratory staff was required to review institutional guidelines on animal monitoring and the protocol.

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
Robert Gibbens, D.V.M., USDA-APHIS-AC

Stanford | RESEARCH

Vice Provost and Dean of Research

A3213-2M

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

April 27, 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 award R01CA231122

Description:

At a convened meeting in January 2023, the IACUC discussed an allegation of noncompliance involving a hamster. While working with a cage, lab staff incorrectly placed a cage card holder on the cage, which created a gap between the metal grill and the cage bottom. A hamster apparently used this gap to escape the cage and ultimately the room itself. In the hallway, the animal became partially stuck to an insect trap. When this was discovered by the animal care staff, the animal's condition was assessed and a decision to euthanize was made. The IACUC 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 an animal.

A preliminary report of this incident was provided to OLAW on December 8th, 2022, via a telephone call from the Associate Director of the Institutional Animal Care and Use Program, Research Compliance Office.

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

Dr. Brent Morse

April 27, 2023

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 Protocol Director (PD).

Corrective Actions and Follow up:

The following actions were completed immediately after the event:

- The PD met with all lab staff to discuss this issue and has retrained them in daily care activities, including how to correctly place cage card holders onto cages.
- In an abundance of caution, a work order had been submitted by the Veterinary Service Center (VSC) to replace the door sweep in case the animal had been able to escape the room by breaching the existing one.
- The VSC removed all inappropriate insect traps that had been inadvertently placed in a single non-animal use area from the facility.

The IACUC requested the following additional actions by the PD:

- That anyone performing animal work in the lab review the IACUC's Guidelines for Animal Care and Monitoring (Including weekends and holidays) and their relevant IACUC protocol(s). Documentation of this training will be reviewed by the IACUC.

In conjunction with the PD's efforts, the IACUC requested the following additional actions by the VSC:

- Provide evidence that the door sweep has been replaced and adjusted to prevent escaped animals from leaving the room.
- Retrain all VSC husbandry staff in this area to remove any insect traps that may be large enough for a rodent to enter, even if these traps are not directly in a rodent room.
- Ensure that the building manager will communicate with Stanford's Operational Core of Lands, Buildings and Real Estate (LBRE) regarding insect control methods to ensure that the insect traps within all areas of the animal facilities are not large enough for a rodent to enter.

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 parties have received appropriate training, and the PD is committed to preventing a future occurrence. Please contact me or (b) (6)

(b) (6) if you have any questions or need additional information.

Sincerely,

(b) (6)

Electronically signed by: Kathryn A Moler
Reason: I have reviewed and am approving this document.
Date: Apr 28, 2023 09:57 PDT

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: Monday, May 8, 2023 4:04 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 final report for case A3213-2M 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: Thursday, May 4, 2023 4:21 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)

McCoy, Devora (NIH/OD) [E]

From: McCoy, Devora (NIH/OD) [E]
Sent: Friday, April 14, 2023 2:04 PM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: OLAW Case A3213-2M

Good afternoon,

During a recent records check, it was discovered that a preliminary case was reported to our office via a phone call on December 8, 2022 regarding a sticky trap. If available, please send either an interim or final report for this case.

Please reference case number A3213-2M.

Thanks,
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

A3213-2M



Initial Report of Noncompliance

By: (b) (6)

Date: 12/8/22

Time: 3:00

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?

Hamster found in sticky traps. Hamster escaped from home cage due to catch between lid.

Species involved: Hamster

Personnel involved:

Dates and times:

Animal deaths:

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

Staff got hamster off traps
counsel staff

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY

Case #