



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 27, 2023

Re: Animal Welfare Assurance
#A3225-01 (OLAW Case 1B)

Dr. Matthew Christian
Associate Vice President for Research
Saint Louis University
3700 West Pine Mall,
Fusz Memorial Hall, (b) (4)
St. Louis, MO 63108

Dear Dr. Christian,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your January 23, 2023 letter reporting a serious deviation from the provisions of the *Guide for the Care and Use of Laboratory Animals* at Saint Louis University, following up on an initial report on December 16, 2022. According to the information provided, OLAW understands that a dead research rat was found in a sticky insect trap on the floor of an animal procedure room. Laboratory staff had been separating weaned animals in the room and the rat probably landed on the floor undetected. The use of multiple sticky traps in this room resulted in animal care staff not identifying the problem promptly.

The corrective action consisted of directing the laboratory staff to count all animals prior to and upon completion of all procedures to ensure that all animals have been returned to their cages. Room log sheets will now indicate the presence of multiple insect traps and that these must be inspected.

Based on its assessment of this explanation, OLAW understands that measures have been implemented to correct and prevent recurrence of this problem. While OLAW concurs with the actions taken by the institution to comply with the PHS Policy on Humane Care and Use of Laboratory Animals, we note that many institutions use live traps to capture escaped research rodents in animal rooms (as well as pest rodents which are then humanely euthanized). Thank you for informing OLAW about this matter.

Sincerely,

(b) (6)

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

cc: IACUC Chair



**SAINT LOUIS
UNIVERSITY**

— EST. 1818 —

**ASSOCIATE VICE
PRESIDENT FOR
RESEARCH**

3700 West Pine Mall
Fusz Memorial Hall
Room 255
St. Louis, MO 63108

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January 23, 2023
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
Phone 301-594-2061
FAX: 301-402-2803
E-mail: olawdco@mail.nih.gov

Institution: Saint Louis University
Animal Assurance Number: D16-00141
AAALACi Accredited July 19, 2021 (Continued Full Accreditation)
Institutional Official: Matthew Christian
Incident number: **A3225-1B**
Date of Incident: **Nov 22, 2022**

Potential or actual effect on PHS supported activities: None. The initial report of this incident indicated funding for the research was covered by a NIH grant, however, further investigation indicated it was funded by the Foundation for Prader Willi Research.

Incident Description:

- **On Nov 22, 2022**, post-approval monitoring alerted veterinary staff that a dead rat was discovered in a sticky insect trap located on the floor of a vivarium animal use room.
- **On Nov 22, 2022**, the veterinarian emailed the IACUC Chair to report this incident.

Investigation:

- **On Nov 30, 2022**, the IACUC Chair and PI met to discuss the incident. The PI indicated laboratory members were separating weaned animals prior to the incident. The PI could not explain how the rat ended up on the floor.
- **On Dec 16, 2022**, the Chairman of the Saint Louis University IACUC contacted OLAW by email to make an initial report of the incident.
- **On Dec 19, 2022**, this incident of noncompliance was discussed at

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the regularly scheduled IACUC meeting. It was concluded at this meeting that during separation of weanlings on **Friday November 18**, one rat dropped undetected to the floor. It was also concluded a factor contributing to the death of this animal was that this room had 4 sticky insect traps rather than the normal single trap used in animal housing rooms. Weekend husbandry staff were unaware of the presence of multiple traps, and consequently, only inspected a single trap. Consequently, the rat was stuck in the sticky trap for 4 days before discovery on **Tuesday, November 22**, with the cause of death being dehydration. Corrective actions described below were discussed and approved by the IACUC.

- **On Jan 3, 2022**, the IACUC chairman sent the PI a letter detailing the IACUC's conclusion that although the incident was accidental it was noncompliant with activities described in the PI's animal use protocol. The letter also described the corrective action plan approved by the IACUC to ensure future compliance by the PI.
- **On Jan 5, 2022**, in a return letter the PI agreed to work with the IACUC and complete the outlined corrective action plan.

Corrective Actions taken by the Institution to address the situation:

Corrective action:

Short Term: Members of the PI's laboratory must be instructed to count animals prior to and upon completion of each procedure to ensure all animals have been returned to cages. **This has been completed.**

Long term: Comparative Medicine will modify room log sheets to indicate when multiple insect traps are present in any room and that all sticky traps must be inspected.

This has been completed.

Submitted by:

(b) (6)

Matthew Christian
Associate Vice President, Research
Saint Louis University

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McCoy, Devora (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Tuesday, January 24, 2023 7:30 AM
To: Matthew Christian
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Saint Louis University incident A3225-1B

Good morning Matthew,

Thank you for sending us this final report for case A3225-1B 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: Matthew Christian <matthew.christian@slu.edu>
Sent: Monday, January 23, 2023 4:20 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: [REDACTED] (b) (6)
Subject: [EXTERNAL] Saint Louis University incident A3225-1B

To whom it may concern,

Please see the attached incident report from Saint Louis University. If you have questions or need additional information please let me know.

All the best,

Matthew

Matthew Christian
Deputy Vice President for Research
M: [REDACTED] (b) (6)
[SLU Impact Report](#)

McCoy, Devora (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Monday, December 19, 2022 8:04 AM
To: John Chrivia
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Initial report of noncompliance

Good morning John,

Thank you for sending us this preliminary report and we look forward to receiving the final report once completed. This report has been assigned OLAW case number **A3225-1B**, so please reference this number when sending the final report.

Thanks,
Devora

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

From: John Chrivia <john.chrivia@health.slu.edu>
Sent: Friday, December 16, 2022 2:54 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Subject: [EXTERNAL] Initial report of noncompliance

I would like to make an initial report of noncompliance that occurred on November 22, 2022, at Saint Louis University. Our Animal Assurance Number is **D16-00141**. I am the IACUC Chairman, John Chrivia. My email is John.Chrivia@Health.SLU.edu, and my office number is (b) (6) if you have any questions or need additional information.

On November 22, 2022: Post-approval monitoring alerted veterinary staff that a dead rat was discovered in a sticky insect trap located on the floor of a vivarium animal use room. The veterinarian emailed the IACUC Chair to report this incident.

On November 30, 2022, the IACUC Chair and PI met to discuss the incident. The PI indicated prior to the incident laboratory staff were separating newly weaned animals. The PI could not explain how the rat ended up on the floor.

This research was supported by PHS funds.

A plan for prevention will be discussed by the SLU IACUC at its regularly scheduled meeting on January 9th, 2023. The plan will be implemented by January 31, 2023, and the final report from the IO will be completed and sent to OLAW by February 15, 2023.

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