



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

October 4, 2022

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

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 September 27, 2022 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Saint Louis University following up on an initial September 2, 2022 notification by telephone.

According to the information provided, this Office understands that the Saint Louis University Animal Care and Use Committee (ACUC) determined that instances of noncompliance occurred with respect to failure to adhere to the activities described in the standard operating procedure (SOP) for the care of the animals and procedures described in the approved animal use protocol. The final report states on August 19, 2022, eleven juvenile red-eared slider turtles were found dead under the basking platform located within a housing water tank in a satellite housing facility. On the same day, the principal investigator (PI) notified the IACUC Chair and Attending Veterinarian of the incident.

It was concluded that incident was the result of improper reinstallation of the basking platform following routine husbandry. As a result, the turtles swam under the platform, but were unable to exit to access air. The matter was discussed at an IACUC meeting and the committee approved short-term and long-term corrective actions. The PI has agreed to work with the IACUC to complete the corrective action plan. The action plan included the following:

- The PI was directed to modify the basking platform structure to prevent trapping of turtles. Note: This action has been completed.
- The veterinary staff will meet the PI and the PI's staff to discuss the importance of following all husbandry SOPs for the care of the turtles and all procedures described in the PI's approved animal use protocol. This action must be completed by November 15, 2022.

It is noted that this research is not supported by PHS funding. Based on its assessment of this explanation, OLAW understands that the Saint Louis University has implemented appropriate measures to correct and prevent recurrences of these problems and is now compliant with provisions of the PHS Policy.

We appreciate being informed of these matters and find no cause for further action by this Office.

Page 2 – Dr. Christian
October 4, 2022
OLAW Case A3225-Z

Sincerely,

Jacquelyn
T. Tubbs -S

Digitally signed by
Jacquelyn T. Tubbs -S
Date: 2022.10.04
15:25:22 -04'00'

Jacquelyn Tubbs, DVM, DACLAM
Senior Animal Welfare Program Specialist
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC Contact

McCoy, Devora (NIH/OD) [E]

From: McCoy, Devora (NIH/OD) [E]
Sent: Wednesday, October 5, 2022 4:31 PM
To: mchristian@slu.edu
Cc: OLAW Division of Compliance Oversight (NIH/OD); (b) (6)
Subject: OLAW Case A3225-Z
Attachments: A3225-Z.pdf

Good afternoon Dr. Christian,

Attached please find Dr. Tubbs' response to OLAW Case A3225-Z. If you have any questions, feel free to contact us by phone or by email.

Best,
Devora

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



SAINT LOUIS UNIVERSITY

— EST. 1818 —

ASSOCIATE VICE PRESIDENT FOR RESEARCH

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September 27, 2022

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 (Full Accreditation)
Institutional Official: Matthew Christian
Date of Incident: **August 19, 2022**

Potential or actual effect on PHS supported activities: None. Investigation indicated this research was not supported by PHS funds.

Incident Description:

- **On August 19, 2022**, in a satellite housing facility, 11 juvenile red-eared sliders turtles were found dead under the basking platform located within a housing water tank.
- **On August 19, 2022**, the Principal Investigator emailed the IACUC Chair and Attending Veterinarian to report this incident.

Investigation:

- **On August 23, 2022**, The IACUC Chair and PI discussed the incident by telephone and concluded the incident was due to improper reinstallation of the basking platform following routine husbandry. As a consequence, turtles swam under the platform but were unable to exit to access air.
- **On September 2, 2022**, the Chairman of the Saint Louis University IACUC contacted OLAW by phone to make an initial report of the incident.
- **On September 13, 2022**, this incident of noncompliance was discussed at the regularly scheduled IACUC meeting. Short term and long-term corrective actions were approved by the IACUC. The PI was directed to make structural modifications on the basking platform to eliminate the possibility of turtles becoming trapped. The PI and the PI's staff were directed to meet with the Veterinary staff to discuss the importance in following all husbandry SOPs for

Higher purpose. Greater good.



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the care of the turtles and all procedures described in the PI's approved animal use protocol.

- **On September 26, 2022**, the IACUC chairman sent the PI a letter detailing the IACUC's conclusion that the incident was noncompliant with activities described in the SOP for the care of the turtles and procedures 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 September 26, 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:

Short term:

- **On September 26, 2022**, the IACUC chairman sent the PI a formal letter describing the incident, the IACUC's findings, and indicating that a report of this incident was made to OLAW.
- The PI was directed to modify the basking platform structure to prevent trapping of turtles. This has been completed.

Long term:

- The Veterinary staff will meet with the PI and the PI's staff to discuss the importance of following all husbandry SOPs for the care of the turtles and all procedures described in the PI's approved animal use protocol. The meeting of PI and staff with the Veterinary staff must be completed by **November 15, 2022**.

Submitted by:

(b) (6)

Matthew Christian
Associate Vice President, Research
Saint Louis University

Higher purpose. Greater good.

McCoy, Devora (NIH/OD) [E]

From: Matthew Christian <matthew.christian@slu.edu>
Sent: Wednesday, September 28, 2022 2:11 PM
To: OLAW Division of Compliance Oversight (NIH/OD)
Cc: (b) (6)
Subject: [EXTERNAL] Incident report Saint Louis University
Attachments: SLU-Incident-Report-09272022.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it may concern,

Please see the attached report of an incident and its resolution at Saint Louis University. If you have questions or need clarifications, please let me know.

All the best

Matthew

Matthew Christian
Associate Vice President
Office of the Vice President for Research

(b) (6)
mchristian@slu.edu

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McCoy, Devora (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Thursday, September 29, 2022 7:51 AM
To: Matthew Christian
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Incident report Saint Louis University

Good morning Matthew,

Thank you for sending us this report and we will send an official response 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: Matthew Christian <matthew.christian@slu.edu>
Sent: Wednesday, September 28, 2022 2:11 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: (b) (6)
(b) (6)
Subject: [EXTERNAL] Incident report Saint Louis University

To whom it may concern,

Please see the attached report of an incident and its resolution at Saint Louis University. If you have questions or need clarifications, please let me know.

All the best

Matthew

Matthew Christian
Associate Vice President
Office of the Vice President for Research

(b) (6)
mchristian@slu.edu

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A3225-Z



Initial Report of Noncompliance

By: J. Tubbs

Date: 09-02-2022

Time: 1123A

Name of Person reporting: (b) (6)

Telephone #:

Fax #:

Email: (b) (6)

Name of Institution: St. Louis University

Assurance number: A3225-Z

Did incident involve PHS funded activity? Internal funding

Funding component:

Was funding component contacted (if necessary): _____

What happened?

A lab tech disassembled a basking platform for red spider turtles, when reassembled, the turtles could float under the platform but could not escape and resulted in the death of 11 turtles.

Species involved: turtle

Personnel involved:

Dates and times: August 19th

Animal deaths: 11

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

Projected submission to OLAW of final report from Institutional Official:

60-90d

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Case # _____