



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

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Office of Laboratory Animal Welfare  
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Bethesda, Maryland 20892-7982  
Home Page: <http://grants.nih.gov/grants/olaw/olaw.htm>

FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare  
Rockledge One, Suite 360  
6705 Rockledge Drive  
Bethesda, Maryland 20817  
Telephone: (301) 496-7163  
Facsimile: (301) 480-3387

May 16, 2023

Re: Animal Welfare Assurance  
A3442-01 [OLAW Case 3I]

Matthew Hodgson, MA, MS, MJ, CHRC, CCRP  
Vice President, Research Compliance and Regulatory Affairs  
Children's Hospital of Philadelphia  
Roberts Center for Pediatric Research  
2716 South Street, (b) (4)  
Philadelphia, PA 19146

Dear Mr. Hodgson,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your April 14, 2023 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals within the animal care and use program at the Children's Hospital of Philadelphia. According to the information provided, OLAW understands that 5 pigs did not receive perioperative analgesics in accordance with the IACUC-approved protocol. The animals were given analgesics at the time of induction and via constant rate infusions throughout the procedures. However, they did not receive a postoperative transdermal fentanyl patch as described in the protocol. The noncompliance was discovered during a routine post-approval monitoring records review. The records indicated no signs of post-operative pain or distress. The animals involved in this incident were supported by PHS funds.

Corrective and preventive measures include: 1) Voluntary halt of work until all corrective and preventive measures are complete and reviewed by the IACUC, 2) Weekly schedule sheets submitted by the research team to the Department of Veterinary Resources (DVR) must include "team leader" sheets describing analgesia/anesthesia plans and naming key personnel, 3) The "team leader" sheets must be signed by two members of the research team, 4) The research team must provide a robust plan to avoid repeat non-compliance, 5) Post-procedure communication with DVR must include analgesia information for each procedure, and 6) An anesthesia recovery form will be used to document the animal's condition until it is fully awake.

OLAW appreciates the consideration of this matter by the Children's Hospital of Philadelphia which was consistent with the philosophy of institutional self-regulation. Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate this incident and prevent recurrence. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

Robyn M. Engel -S

Digitally signed by Robyn M. Engel  
-S  
Date: 2023.05.16 07:44:57 -04'00'

Robyn M. Engel, DVM  
Animal Welfare Program Specialist  
Office of Laboratory Animal Welfare

cc: IACUC contact  
Dr. Robert M. Gibbens, USDA, APHIS, Animal Care

A3442-3I

Matthew Hodgson  
Vice President, Research Compliance & Regulatory Affairs  
Roberts Center for Pediatric Research, (b) (6)  
2716 South Street  
Philadelphia, PA 19146  
(b) (6)

April 14, 2023

Brent Morse, DVM  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare (OLAW)  
National Institutes of Health  
6700B Rockledge Drive, Suite 2500, MSC 6910  
Bethesda, MD 20892-7982

Dear Dr. Morse:

The Children's Hospital of Philadelphia (CHOP), in accordance with Assurance D16-00280 (A3442-01) and PHS Policy IV.F.3., submits this report of noncompliance regarding the following:

During a routine Post-Approval Monitoring (PAM) review of animal records for IACUC protocol 21-001373 – *"Advanced Therapies in Mitochondrial Changes"*, it was noted that analgesics were not administered in accordance with the IACUC approved protocol. The protocol is approved for administration of Buprenorphine Sustained/Extended Release (0.1-0.2 mg/kg) alone or Buprenorphine Hydrochloride (0.01-0.02 mg/kg) with transdermal Fentanyl (2-5mcg/kg/hr via patch). Five animals received Buprenorphine without the application of transdermal Fentanyl patch. The records indicated there were no signs of pain or distress post-operatively, all pigs received Buprenorphine at time of anesthetic induction as well as fentanyl and dexmedetomidine Constant Rate Infusions (CRIs) throughout the procedures. These five animals were supported by 5R21ES031243-02 and 1R56HL158696-01).

This non-compliance and the research team's submitted corrective action plan was discussed at the regularly scheduled monthly IACUC meeting on March 13, 2023. After the initial discussion by the Committee, a member of the research team joined the meeting to answer questions from the IACUC. After discussions, the IACUC unanimously approved the following requirements:

- Voluntarily halt of work on this protocol until the requirements below are completed and reviewed at a subsequent IACUC meeting.
- Additions to the weekly schedule currently submitted by the research team to Department of Veterinary Resources (DVR) must include any "team leader" sheets, the anesthesia/analgesia information, as well as the names of the collaborator(s), team leader, and lead technician for the upcoming procedures scheduled.



Children's Hospital  
of Philadelphia

Research Compliance & Regulatory Affairs

2716 South Street, 17th Floor • Philadelphia, PA 19104 • 267-426-8723

Brent Morse, DVM  
April 14, 2023  
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- Review of "team leader" sheets are required and must be documented via "sign-off" by two separate members of the research team. This will apply to procedures on any of the research team's swine protocols.
- Provide a more robust corrective and preventative action plan to avoid repeat non-compliance.
- The post-procedure follow-up communication with the DVR veterinarians must be adjusted to include the analgesia information for each procedure.
- Implement the use of an anesthesia recovery form. This form is to be completed once surgery is completed, anesthesia is off, and the animal is waking up. This form is to remain with the animal until it is fully awake (sternal, ambulatory, or eating).

In addition, the IACUC voted to report this incident to the AAALAC International and the Office of Laboratory Animal Welfare (OLAW). At the April 10, 2023 IACUC meeting, the IACUC reviewed the research team's response and revised corrective/protective action plans. The IACUC had no additional questions and found the plan to be acceptable.

CHOP is committed to quality animal care. We believe that these steps are appropriate to address the noncompliance issue that was identified. However, if you would like us to take any additional measures or desire additional information, please do not hesitate to contact me, our IACUC Chair (Laurence C. Eisenlohr, VMD, PhD), or the Attending Veterinarian (Charlette Cain, DVM, MS, DACLAM).

Sincerely,

(b) (6)

CR Matthew Hodgson, MA, MS, MJ, CHRC, CCRP  
Institutional Official

cc: AAALAC

(b) (6)

Charlette Cain DVM, MS, DACLAM – Attending Veterinarian and Senior Director, DVR  
Laurence C. Eisenlohr, VMD, PhD-IACUC Chair

**McCoy, Devora (NIH/OD) [E]**

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Monday, April 17, 2023 12:00 PM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: OLAW Assurance D16-00280 A3442-01\_ - Report of Noncompliance

Good afternoon (b) (6)

Thank you for sending us this report, assigned OLAW case number A3442-3I, 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](mailto:devora.mccoy@nih.gov)

**From:** (b) (6)  
**Sent:** Friday, April 14, 2023 3:33 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <[olawdco@od.nih.gov](mailto:olawdco@od.nih.gov)>  
**Cc:** Hodgson, Matthew <[HODGSONM@chop.edu](mailto:HODGSONM@chop.edu)>; Eisenlohr, Laurence C <[EISENLOHRL@chop.edu](mailto:EISENLOHRL@chop.edu)>; Cain, Charlette <[CAINC1@chop.edu](mailto:CAINC1@chop.edu)>  
**Subject:** [EXTERNAL] OLAW Assurance D16-00280 A3442-01\_ - Report of Noncompliance

Dear OLAW,

Attached to this email please find a report of noncompliance with the PHS Policy. We look forward to your review of this matter.

Thank you,

(b) (6)