



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

June 29, 2023

Re: Animal Welfare Assurance
A3222-01 [OLAW Case 1M]

Aleister Saunders, Ph.D.
Executive Vice Provost for Research and Innovation
Drexel University
3180 Chestnut Street, (b) (4)
Philadelphia, PA 19104

Dear Dr. Saunders,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your letter dated June 16, 2023, reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Drexel University. Your letter supplements the information provided in a preliminary report to this office on May 18th. According to the information provided, OLAW understands that on May 12th, 2023, it was reported that two cages of rats (n=5) appeared frail and thin. The laboratory was immediately notified. All animals were removed from food restriction on May 12th. On May 15th, the PI stated two cages of female rats (n=5) that were on food restriction did not receive care from May 5th-11th, due to a miscommunication between two members of the lab. The reason for the failure to identify that animals were not fed was a range of animal numbers were used on the chart instead of individual numbers. The study is sponsored by NIH.

Corrective and preventive measures: To avoid these miscommunications, all lab members have been asked to communicate animal care requests by email, specifically list all individual animal numbers (and not ranges), and to attach cage cards to their emails. They will also specifically list all individual animal numbers (and not ranges) on the daily food restriction feeding chart that should ensure they fed all the animals. The PI will also be copied on all emails and receive a text message as soon as the animals are fed so she can check to confirm all the animals are fed.

Based on the information provided, OLAW is satisfied that appropriate actions have been taken by Drexel University to investigate this incident, provide corrective measures, and prevent recurrence. OLAW concurs that the incident warranted reporting. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

Brent C. Morse -S

Digitally signed by Brent C. Morse -S
Date: 2023.06.29 16:04:02 -04'00'

Brent C. Morse, DVM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC contact



DREXEL UNIVERSITY
Office of
**Research &
Innovation**

A3222-1M

June 16, 2023

Axel Wolff, DVM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health
Rockledge 1, Suite 360
6705 Rockledge Drive
Bethesda, MD 20892

Dear Dr. Wolff:

Drexel University, in accordance with Assurance D16-00138 and PHS Policy IV.F.3., provides this report of noncompliance regarding an oversight of care on five rats (*Rattus rattus*). This study is sponsored by NIH. The preliminary report was assigned case number **A3222-1M**.

On May 12th, 2023, it was reported by a ULAR Animal Care Technician that two cages of rats (n=5) appeared frail and thin. The laboratory was immediately notified.

In a self-report submitted by the Principal Investigator (PI) on May 15th, 2023, the PI stated two cages of female rats (n=5) belonging to a protocol that were on food restriction did not receive care from May 5th – 11th, 2023 due to a miscommunication between two members of my lab. The PI was away at a conference and lab's primary care giver for these animals was away attending a family emergency out of the country and had requested another lab member to provide the care. These two cages of animals were undergoing behavioral tasks in another room when he physically showed her all the cages in the animal housing room that needed to be fed. The primary caregiver likely forgot to mention that there were two other cages of animals. These two cages of animals were also on a separate rack in the animal housing room and the temporary caretaker did not realize they all belonged to the same protocol and were on food restriction. The lab does maintain the food restriction records and the charts are filled in everyday after feeding. The reason for its failure to identify that animals were not fed was a range of animal numbers were used instead of individual numbers on the chart (eg: Z1-Z16-Z32 while the animals that were missed was Z17-Z21).

As of May 15th, 2023, all animals were removed from food restriction on May 12th and have regained healthy weight. Given the stress the animals have experienced over this period, the PI



DREXEL UNIVERSITY
Office of
**Research &
Innovation**

confirmed these animals were removed from the behavioral studies and were euthanized on May 17th.

The self-report included a proposed preventative plan. To avoid these miscommunications, all lab members have been asked to communicate animal care requests by email, specifically list all individual animal numbers (and not ranges), and to attach cage cards to their emails. They will also specifically list all individual animal numbers (and not ranges) on the daily food restriction feeding chart that should ensure they fed all the animals. The PI will also be copied on all emails and receive a text message as soon as the animals are fed so she can check to confirm all the animals are fed. She takes personal responsibility to ensure all animals are maintained in good health and these mistakes will not be repeated.

On June 14th, 2023, the IACUC reviewed the self-report and the action plan and voted to accept the plan.

Drexel University is committed to protecting the welfare of animals used in research and appreciates the guidance and assistance provided by OLAW in this regard. Should you have any questions regarding this report, please contact Michael O'Connor, MD, PhD, IACUC Chair or Richard Huneke, DVM, attending veterinarian.

Thank you for your consideration of this matter.

Saunders, Aleister
Digitally signed by
Saunders, Aleister
Date: 2023.06.16
12:49:46 -04'00'

Aleister Saunders, Ph.D.
Executive Vice Provost for Research and Innovation
Institutional Official
Professor, Department of Biology
<https://drexel.edu/coas/faculty-research/faculty-directory/Saunders/>

McCoy, Devora (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Tuesday, June 20, 2023 7:27 AM
To: iacuc
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Drexel University (Assurance D16-00138) A3222-1K, A3222-1M, A3222-1N Final Reports

Good morning (b) (6)

Thank you for sending us the final reports for cases A3222-1K, A3222-1M, and A3222-1N. Also, thank you for labeling the files with the case numbers, that's greatly appreciated!

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: iacuc <iacuc@drexel.edu>
Sent: Friday, June 16, 2023 1:21 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Saunders,Aleister <ajs56@drexel.edu>; Myers,Cassandra <cjm523@drexel.edu>; OConnor,Michael <oconnomp@drexel.edu>; Huneke,Richard <rbh25@drexel.edu>
Subject: [EXTERNAL] Drexel University (Assurance D16-00138) A3222-1K, A3222-1M, A3222-1N Final Reports

Good Afternoon,

Drexel University, in accordance with Assurance D16-00138 and PHS Policy IV.F.3., provides the attached final report to OLAW for the following cases:

- A3222-1K
- A3222-1M
- A3222-1N

Please let us know if you require any additional information.

Best,
(b) (6)

(b) (6)



A3222-1M

Initial Report of Noncompliance

By: DCM

Date: 5/18/23

Time: 1:30pm

Name of Person reporting: (b) (6) Mike O'Conner

Telephone #:

Fax #:

Email: iacuc@drexel.edu

Name of Institution: Drexel University

Assurance number: A3222-01

Did incident involve PHS funded activity? Yes

Funding component: NIH

Was funding component contacted (if necessary):

What happened:

May 12- animal care tech reported 5 female rats appeared fragile & thin; reported by PI to IACUC; animals on food restriction and didn't receive care between May 5-11 due to miscommunication. Animals removed from food restriction on May 12 and regained healthy weights. Animals involved were euthanized on May 17.

Species involved: Rats

Personnel involved: Animal care tech and PI lab group

Dates and times:

Animal deaths: n/a

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

Corrective actions: moving forward, lab members will communicate animal care requests by email using individual animal numbers and PI will be copied on all emails and will receive texts when animals are fed for confirmation.

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY

Case #