



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

July 7, 2023

Re: Animal Welfare Assurance
A3045-01 (OLAW Case 3L)

Sheila Vrana, Ph.D.
Associate Dean for Research
Penn State University – Hershey Medical Center
Office of Research Affairs, (b) (4)
500 University Drive, PO Box 850
Hershey, PA 17033

Dear Dr. Vrana,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your July 3, 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 Pennsylvania State University – College of Medicine. Your letter supplements the information in the telephone preliminary report made on May 25, 2023. According to the information provided, OLAW understands that between April 21, 2023, and April 24, 2023, veterinary orders were not followed, and tail amputation was performed, without proper technique and without IACUC review and approval. This resulted in tail necrosis in two mice. Veterinary staff informed the lab that if the tail lesions did not heal, and further clinical decline in condition of the mice was observed over the weekend, that euthanasia would be warranted. The lab agreed and did not express interest in pursuing a surgical alternative, such as tail amputation.

On April 24, veterinary staff observed that the clinical condition of the mice had not improved, and both had bone exposure at the end of their tails. The lab was instructed to euthanize both mice by the end of the day, or veterinary staff would provide this service if the lab was unable to do so. No response was received and upon contacting the lab again at the end of the day, veterinary staff learned that a lab member had cut off the tip of the tail from one mouse. The survival surgical procedure for tail amputation/removal is not approved on their IACUC protocol and was performed without sterile tools, anesthesia, or analgesia.

Veterinary staff promptly examined the mice and determined both needed a tail amputation if the lab did not wish to euthanize. The lab consented to the tail amputations, which were performed by veterinary staff. After several days of analgesia and monitoring, both mice had an improved clinical condition and healed well. Veterinary staff communicated to the lab that tail amputation (even of exposed bone) is a surgical procedure that requires aseptic technique, anesthesia, and pain medication. The activities were not PHS supported.

Corrective and preventive actions included:

1. The PI must submit amendments to any protocols where a surgical procedure for tail amputation is or may be needed; and add additional methods of anesthesia and/or analgesia. IACUC Policy regarding survival surgery in rodents must be followed.
2. The PI and laboratory personnel were reminded that they must follow veterinary recommendations and respond to veterinary communications in a timely manner.

3. The PI and laboratory personnel were reminded that they must review and follow their IACUC-approved protocols prior to conducting procedures.

The consideration of this matter by the Pennsylvania State University – College of Medicine was consistent with the philosophy of institutional self-regulation. Similarly, reporting the issue to OLAW was appropriate. Although this activity was not PHS funded, the application of the expectations of the PHS Policy across the animal care and use program reduces any potential appearance of a double standard. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

Brent C. Morse -S

Brent C. Morse, DVM

Director

Division of Compliance Oversight

Office of Laboratory Animal Welfare

Digitally signed by Brent C.

Morse -S

Date: 2023.07.07 14:37:23 -04'00'

cc: IACUC contact



PennState
College of Medicine

Sheila L. Vrana, Ph.D.
Associate Dean for Research
Associate Professor, Dept. of Pharmacology
Institutional Official, Animal Care and Use Committee
Penn State College of Medicine
Mail Code H138, Room C1614

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P.O. Box 850
Hershey, PA 17033-0850
717-531-8495
svrana@psu.edu

A3045-3L

July 3, 2023

Brent C. Morse, DVM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare
6700B Rockledge Drive, Suite 2500, MSC 6910
Bethesda, MD 20892-6910

Re: Implementation of any significant change to IACUC-approved protocols without prior IACUC approval as required by IV.B.7; failure of animal care and use personnel to carry out veterinary orders; Animal Welfare Assurance D16-00024 (A3045-01); not PHS funded

Dear Dr. Morse,

The Pennsylvania State University College of Medicine, in accordance with Assurance D16-00024 (A3045-01) and PHS Policy IV.F.3., provides this report of noncompliance that occurred between April 21, 2023, and April 24, 2023, in which veterinary orders were not followed and tail amputation was performed, without proper technique and without IACUC review and approval. This incident was first reported to you on May 25, 2023, by a voicemail from Dr. Jenelle Izer.

On April 21, 2023, two mice were placed on clinical report by veterinary staff for tail necrosis. Veterinary staff informed the lab that if the tail lesions did not heal, and further clinical decline in condition of the mice was observed over the weekend, that euthanasia would be warranted. The lab agreed and did not express interest in pursuing a surgical alternative, such as tail amputation.

On April 24, veterinary staff observed that the clinical condition of the mice had not improved, and both had bone exposure at the end of their tails. The lab was instructed to euthanize both mice by the end of the day, or veterinary staff would provide this service if the lab was unable to do so. No response was received and upon contacting the lab again at the end of the day, veterinary staff learned that a lab member had cut off the tip of the tail from one mouse. The survival surgical procedure for tail amputation/removal is not approved on their IACUC protocol and was performed without sterile tools, anesthesia, or analgesia.

Veterinary staff promptly examined the mice and determined both needed a tail amputation if the lab did not wish to euthanize. The lab consented to the tail amputations, which were performed by veterinary staff. After several days of analgesia and monitoring, both mice had an improved clinical condition and healed well. Veterinary staff communicated to the lab that tail amputation (even of exposed bone) is a surgical procedure that requires aseptic technique, anesthesia, and pain medication.

To address the situation, the IACUC recommended the following corrective action plan:

1. The PI must submit amendments to any protocols where a surgical procedure for tail amputation is or may be needed; and add additional methods of anesthesia and/or analgesia. IACUC Policy regarding survival surgery in rodents must be followed.
2. The PI and laboratory personnel were reminded that they must follow veterinary recommendations and respond to veterinary communications in a timely manner.
3. The PI and laboratory personnel were reminded that they must review and follow their IACUC-approved protocols prior to conducting procedures.

The findings of the investigation and actions taken were reviewed at a convened meeting of the IACUC on May 22, 2023. The IACUC recommended to the IO that the incident be reported to OLAW.

Please feel free to contact me if you require additional information.

Sincerely,

(b) (6)

Sheila Vrana, PhD
Institutional Official

McCoy, Devora (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Wednesday, July 5, 2023 8:56 AM
To: Vrana, Sheila
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Communication from Penn State College of Medicine

Good morning Dr. Vrana,

Thank you for sending us this final report for case A3045-3L 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: Vrana, Sheila <svrana@pennstatehealth.psu.edu>
Sent: Monday, July 3, 2023 12:52 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: IACUC <IACUC@pennstatehealth.psu.edu>; IACUCChair <IACUCChair@pennstatehealth.psu.edu>; (b) (6)
(b) (6) accredit@aaalac.org; Izer, Jenelle <jjizer@pennstatehealth.psu.edu>; Vrana, Sheila <svrana@pennstatehealth.psu.edu>
Subject: [EXTERNAL] Communication from Penn State College of Medicine

Dear Dr. Morse,
Please see attached communication, and let me know if you need additional information.
Thank you,
Sheila Vrana

Sheila L. Vrana, Ph.D. (*she, her, hers*)
Associate Dean for Research and Associate Professor of Pharmacology
Penn State College of Medicine
500 University Drive Box 850, Mail Code H138 | Hershey, PA 17033 | USA
(b) (6) | ✉ svrana@psu.edu

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A3045-3L

Initial Report of Noncompliance

By: BCM

Date: 5/25/2023

Time: 1:15 voicemail

Name of Person reporting: Jenelle Izer, DVM
Telephone #: (b) (6)
Fax #:
Email:

Name of Institution: Penn St. Univ. Hershey Med. Cen., Coll. of Med.
Assurance number: A3045

Did incident involve PHS funded activity? no
Funding component:
Was funding component contacted (if necessary):

What happened: Two mice found with tail necrosis after tail vein injection. After two days, bone was exposed, and Vet recommended euthanasia. Instead, lab staff "cut the tip of the tail off" as treatment.

Species involved: Mus
Personnel involved: Researchers
Dates and times: until 4/21/2023
Animal deaths: no

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

Projected submission to OLAW of final report from Institutional Official:

<60 days

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Case #