



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) 402-7065

October 31, 2018

Re: Animal Welfare Assurance
A3431-01 [OLAW Case 80]

Dr. Lisa Muto
Executive Dean for Administration
Harvard Medical School
25 Shattuck Street, Gordon Hall – [REDACTED]
Boston, MA 02115

Dear Dr. Muto,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your October 29, 2018 letter reporting two instances of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Harvard Medical School. According to the information provided, OLAW understands the following about the incidents and the corresponding corrective actions:

- 1) Eight live mice were found in a carcass refrigerator due to a failure to confirm death following exposure to CO2.

Corrective action: The mice were appropriately euthanized. All animal caretakers and investigators were retrained on CO2 euthanasia and use of a secondary method to confirm death.

- 2) A live mouse was found in a carcass bag.

Corrective action: The mouse was euthanized. All animal care staff was required to demonstrate proficiency in performing euthanasia. The euthanasia standard operating procedure was revised to include cervical dislocation following CO2 exposure when not using the automated method.

Based on its assessment of this explanation, OLAW understands that measures have been implemented in both situations to correct and prevent recurrence of the incident. OLAW concurs with the actions taken by the institution to comply with the PHS Policy.

Sincerely,

(b) (6)

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

cc: IACUC Chair



HARVARD MEDICAL SCHOOL

A3431-80

LISA M. MUTO, Ph.D.
EXECUTIVE DEAN FOR ADMINISTRATION
HARVARD MEDICAL SCHOOL
25 SHATTUCK STREET, SUITE 410
BOSTON, MA 02115

October 29, 2018

Brent Morse, DVM
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

FINAL REPORT

RE: Non-Compliance Report: Assurance: **A3431-01**
Harvard Medical Area Standing Committee on Animals (HMA IACUC)
Species: mouse **Grant:** N/A

Dear Dr. Morse,

This letter serves as a final report on recent incidents of noncompliance that have not been preliminarily reported to OLAW by the Harvard Medical Area Standing Committee on Animals (HMA IACUC).

In August 2018, an animal care technician found 8 mice alive in a carcass refrigerator in one of the animal facilities. The animal care technician immediately euthanized the mice via CO2 inhalation. The animal care technician could not determine who was responsible and why the mice ended up there. In response to this incident, the HCCM training manager retrained all animal care technicians at the facility on proper CO2 euthanasia procedures and scheduled training sessions with all researchers in the labs that have animals at the facility to review secondary methods of euthanasia and signs to confirm death.

In September 2018, an animal care technician discovered a mouse alive in a carcass bag in the euthanasia room in the same facility. The animal care technician immediately euthanized the mouse via CO2 inhalation. The animal care technician could not determine who was responsible. In response to this second incident, all HCCM animal care staff were required to demonstrate euthanasia proficiency with both the automated and table-top equipment methods. Additionally, the SOP for table-top euthanasia is being re-written to require HCCM staff to perform a secondary, physical method of cervical dislocation on all animals that are euthanized using table-top equipment.

The Committee is satisfied with the corrective actions mentioned above and considers these incidents to be resolved. Due to the rarity of this incident (several years without this ever being reported) the Committee voted after the August incident not to report because they didn't view this as a programmatic issue and there was no way to identify if the mice were associated with NIH funding. With both incidents, the mice involved could not be connected to a particular protocol and, as such, no grant number is listed on this report. Please let us know if any additional information is required.

Sincerely,

(b) (6)

Lisa M. Muto, PhD

Executive Dean for Administration

HMA Institutional Animal Care & Use Committee: Institutional Official

CC: **Gerald B. Pier, PhD**

Chairman, Harvard Medical Area Standing Committee on Animals

Brian F. Corning, DVM, DACLAM

Director of the Harvard Center for Comparative Medicine, Harvard Medical School: Attending Veterinarian

Arlene Santos-Diaz, MS, CPIA

Director, Office of the IACUC, Harvard Medical School

Jennifer M. Ryan, JD

Executive Director, Office of Academic and Research Integrity, Harvard Medical School

(b) (6)

Morse, Brent (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Monday, October 29, 2018 3:12 PM
To: HMS-IACUC; OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Final Report

Thank you for providing this report. We will send an official response soon.

Best regards, Brent Morse

Brent C. Morse, DVM, DACLAM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health

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From: HMS-IACUC [mailto:iacuc@hms.harvard.edu]
Sent: Monday, October 29, 2018 2:51 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Subject: Final Report