



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

April 12, 2019

Re: Animal Welfare Assurance  
A3426-01 [OLAW Case Z]

Dr. Fisher-Adams  
Director, Office of Research Compliance  
California Institute of Technology  
1200 E. California Boulevard, MC 104-010  
Pasadena, CA 91125

Dear Dr. Fisher-Adams,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your April 11, 2019 letter reporting a serious deviation from the provisions of the *Guide for the Care and Use of Laboratory Animals* at the California Institute of Technology, following up on an initial telephone report on March 6, 2019.

According to the information provided, OLAW understands that a rhesus monkey on a fluid restriction protocol failed to receive water for more than one day.

The immediate action taken upon discovery consisted of providing water for the monkey. The animal was judged to be in good health by the veterinary staff. The corrective actions consisted of the veterinary staff and Institutional Animal Care and Use Committee (IACUC) counseling and retraining the laboratory staff on appropriately applying fluid restriction. A corrective action plan was developed and oversight was improved to ensure that all animals receive water as required. The NIH funding component was notified and the grant was not charged for any unauthorized animal activities.

Based on its assessment of this explanation, OLAW understands that measures have been implemented to correct and prevent recurrence of this problem. OLAW concurs with the actions taken by the IACUC to comply with the PHS Policy on Humane Care and Use of Laboratory Animals.

Sincerely,

(b) (6)

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

cc: IACUC Chair

# Caltech

Office of Research Compliance

Grace Fisher-Adams, PhD, JD  
Director, Institutional Official  
1200 E. California Blvd., MC B110-31  
Pasadena, CA 91125  
(626) 395-2907  
Grace.Fisher-Adams@caltech.edu

April 11, 2019

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:

The California Institute of Technology, in accordance with Assurance D16-00266 (A3426-01) and PHS Policy IV.F.3., provides this report of an incident where one NHP was not provided with water for several hours. This incident was first reported to Dr. Axel Wolff, OLAW, on March 6, 2019, via a telephone call from Karen Lencioni, DVM, DACLAM, Director of Office of Laboratory Animal Resources.

On February 12, 2019, the Office of Research Compliance received information from the Attending Veterinarian that a single NHP on a fluid regulation study was not provided with water for several hours. Upon routine review of the animal care records, the Office of Laboratory Animal Resources (OLAR) animal care staff discovered that the lab had not provided fluid as required. OLAR staff notified the laboratory to provide water immediately, and the lab responded accordingly. The animal was otherwise found in good health by the OLAR veterinary staff.

A review of billing records showed that a portion of the direct costs associated with the care of the affected animal was charged to a NIH Grant NS083063. These costs have been reallocated, invoiced to, and paid from nonfederal sources. The NIH funding component affected will be notified of the situation.

To address the situation, the veterinary staff and IACUC followed up with the laboratory to remind them of the vital importance of ensuring animals have proper and regular access to water. The laboratory underwent retraining on proper procedures for water regulation and submitted a proposed corrective action plan including an improved system of oversight to ensure correct water provision. At its meeting on April 9, 2019, the IACUC reviewed, modified, and accepted the corrective action plan as submitted by the PI.

Caltech 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 Richard Andersen, Ph.D., IACUC Chair.

Thank you for your consideration of this matter.

Sincerely,

(b) (6)

Grace Fisher-Adams, PhD, JD  
Director of Research Compliance  
Institutional Official

## Morse, Brent (NIH/OD) [E]

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, April 12, 2019 7:58 AM  
**To:** IACUC; OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** Fisher-Adams, Grace C.; Lencioni, Karen C.; Andersen, Richard A.  
**Subject:** RE: Caltech Report of Incident

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:** IACUC [mailto:IACUC@caltech.edu]  
**Sent:** Thursday, April 11, 2019 6:34 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Fisher-Adams, Grace C. <Grace.Fisher-Adams@caltech.edu>; Lencioni, Karen C. <kchase@caltech.edu>; Andersen, Richard A. <richard.andersen@vis.caltech.edu>  
**Subject:** Caltech Report of Incident

To Whom it May Concern,

Attached is a report of an animal welfare incident that took place at Caltech on February 12, 2019. The incident was discussed between Axel Wolff, DMV, and Dr. Karen Lencioni on March 6, 2019.

If there are any questions or concerns regarding the attached follow-up report, please let me know.

Thank you,

(b) (6)





## Initial Report of Noncompliance

By: aw

Date: 3/6/19

Time: 12:00

Name of Person reporting: Karen Lencioni

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: Cal Tech

Assurance number: A3426

Did incident involve PHS funded activity? yes

Funding component: \_\_\_\_\_

Was funding component contacted (if necessary): \_\_\_\_\_

What happened?

Didn't get water for 33 hrs, monkey ok, on water restriction  
Miscommunication

Species involved: Rhesus

Personnel involved:

Dates and times:

Animal deaths: No

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

Give water, return lab

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY

Case # \_\_\_\_\_