



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

September 19, 2018

Re: Animal Welfare Assurance  
A3077-01 [OLAW Case 4P]

Ms. Robyn Diaz  
Senior Vice President and Chief Legal Officer  
St. Jude Children's Research Hospital  
262 Danny Thomas Place, MS 400  
Memphis, TN 38105-2794

Dear Ms. Diaz,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your September 18, 2018 letter reporting a serious deviation from the provisions of the *Guide for the Care and Use of Laboratory Animals* at St. Jude Children's Research Hospital. According to the information provided, OLAW understands that one mouse died and two required euthanasia due to lack of water caused by a disconnected rack water hose. The hose had not been properly seated and became separated, thus preventing water flow.

The preventive measures consisted of having animal care staff double check water hose connections, updating the standard operating procedure to include checking water hose connections, adding a note on the rack to have staff ensure proper seating of the hose, and contacting the manufacturer regarding information on locking water hoses in place.

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 institution to comply with the PHS Policy on Humane Care and Use of Laboratory Animals.

Sincerely,

(b) (6)

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

cc: IACUC Chair



A3077-4P  
Robyn Diaz  
Chief Legal Officer, Senior Vice President  
Office of Legal Services

t 901.595.2288 f 901.595.5944  
robyn.diaz@stjude.org

September 18, 2018

Axel Wolff, D.V.M.  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare/NIH  
RKL1, Suite 360 MSC 7982  
6705 Rockledge Dr.  
Bethesda, MD 20892-7982

Subject: Report of Noncompliance/Animal Welfare Assurance D16-00043 (A3077-01)

Dear Dr. Wolff:

Please accept this written report which documents an incident of noncompliance with Public Health Service (PHS) policy governing the care and use of laboratory animals. A description of the incident and the corrective actions taken to prevent the recurrence of a similar incident of noncompliance are provided below.

On Saturday April 7, 2018, while conducting daily room observations, an Animal Resources Center (ARC) Husbandry Services Technician (HST) found a recoil hose disconnected from a double-sided ventilated rack. The hose was connected to the water supply line, but it was not connected to the rack. One animal was found dead and two other animals were found to be moribund and were euthanized later. The HST reported the incident to her supervisor. An ARC staff veterinarian, who was alerted to the incident, reported it to the ACUC.

A subcommittee of the ACUC met on April 13, 2018 and interviewed the HSTs who worked in the room on the days prior to the day the animals were found and the HST who found the rack disconnected from the water supply.

The subcommittee learned that the HST who worked on April 6, 2018 was training new employees on husbandry practices (microisolation technique, daily observations, rack flush, including disconnecting and connecting the recoil hose to the rack and the water line on the wall, and room sanitation). Sometime after the training session on April 6, 2018 and the morning of April 7, 2018, the recoil hose separated from the rack. Apparently, during the training procedure, the recoil hose was not adequately seated in the recoil hose fitting on the rack resulting in the release of the recoil hose, restricting the mice from access to water.

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Wednesday, September 19, 2018 8:18 AM  
**To:** (b) (6) OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** Diaz, Robyn; Downing, James; Morgan, Jim; (b) (6) Calabrese, Christopher;  
(b) (6) Rahija, Richard J; Schultz-Cherry, Stacey; (b) (6)  
**Subject:** RE: Report of Noncompliance/Animal Welfare Assurance D16-00043

Thank you for providing this final 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:** (b) (6)  
**Sent:** Tuesday, September 18, 2018 5:00 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Diaz, Robyn <Robyn.Diaz@STJUDE.ORG>; Downing, James <James.Downing@STJUDE.ORG>; Morgan, Jim <Jim.Morgan@STJUDE.ORG>; (b) (6) Calabrese, Christopher <Christopher.Calabrese@STJUDE.ORG>; (b) (6) Rahija, Richard J <Richard.Rahija@STJUDE.ORG>; Schultz-Cherry, Stacey <Stacey.Schultz-Cherry@STJUDE.ORG>; (b) (6)  
**Subject:** Report of Noncompliance/Animal Welfare Assurance D16-00043

On behalf of Robyn Diaz, JD, Institutional Official.

cc: Dr. James Downing, President and CEO  
Dr. Jim Morgan, Scientific Director  
(b) (6)  
Dr. Christopher Calabrese, Administrative Director – Laboratory Operations  
(b) (6)  
Dr. Richard J. Rahija, Director, ARC  
Dr. Stacey Schultz-Cherry, Chair, ACUC  
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