



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

December 6, 2018

Re: Animal Welfare Assurance
#A3227-01 (OLAW Case 5I)

Dr. John F. Manning, Jr.
Chief Operating Officer
Vanderbilt University Medical Center
D-3300 Medical Center North
11611 21st Avenue South
Nashville, Tennessee 37232-2104

Dear Dr. Manning,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your December 4, 2018 letter responding to my October 10, 2018 request for additional information regarding the suspension of animal activities at Vanderbilt University. According to the information provided, OLAW understands the following:

- 1) The NIH funding component had been notified about the suspension.
- 2) The NIH grant was not charged for any experimental animal activities during the period of suspension.
- 3) Mice not given the required analgesics were not reported to have exhibited signs of pain or distress.
- 4) To prevent a recurrence of the problems which led to the suspension, the Principal Investigator (PI) amended the protocol to include all animal procedures and drugs used. The animal activities are now conducted within the vivarium, the PI counseled the staff to perform procedures only as described in the protocol, the PI will monitor the surgeries, and the laboratory staff will take an aseptic surgery course.
- 5) Two post-approval monitoring visits to the laboratory found no animal welfare concerns. PAM staff retrained the laboratory staff and will continue monitoring to ensure compliance.
- 6) Prior to working with animals, all research staff must take species specific training and instruction on working with the Institutional Animal Care and Use Committee (IACUC).
- 7) PAM visits found no animal welfare issues or ongoing noncompliance and monitoring will continue.

Based on its assessment of this additional information, OLAW has a better understanding regarding the resolution of this case and concurs with the actions taken by the IACUC to comply with the PHS Policy on Humane Care and Use of Laboratory Animals. We appreciate having been informed about this matter and find no cause for further action by this Office.

Sincerely,

(b) (6)

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

cc: IACUC Chair
Director of Animal Welfare



John F. Manning, Jr., Ph.D., MBA
Chief Operating Officer
Corporate Chief of Staff

December 4, 2018

Axel Wolff, MS, DVM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
Rockledge One, Suite 360
6705 Rockledge Drive – MSC 7982
Bethesda, MD 20892-7982

Regarding: Vanderbilt University Medical Center - Assurance #A-3227-01

Dear Dr. Wolff:

The Vanderbilt University Medical Center (VUMC)/ Vanderbilt University (VU) or the Department of Veterans Affairs Tennessee Valley Healthcare System (TVHS) Institutional Animal Care and Use Committee (IACUC) is responding to your letter dated October 10, 2018, Case 5I.

Below is the information requested:

1. *Was the NIH funding component contacted about the suspension?*
Yes, the VU Office of Sponsored Programs Administration emailed the Program Official at the National Institutes of Neurological Disorders and Stroke on October 10, 2018 to notify them of the suspension.
2. *Did the institution ensure that the grant was not charged for any experimental animal activities during the period of suspension?*
Yes.
3. *Did the mice experience pain or distress due to not receiving the required analgesics?*
The IACUC/OAWA found no evidence of an animal welfare issue due to pain or distress for these mice.
4. *Provide a detailed accounting of the corrective actions taken by the Principal Investigator (PI) to prevent a recurrence of the noncompliance.*
 - a. The PI has amended the protocol to include a description of all procedures performed in, and drugs administered to, live animals. The amendment was submitted on August 22nd and approved on October 12th.
 - b. The PI has contacted the Division of Animal Care and experiments are now being accommodated in a housing room inside the centralized facility.
 - c. The PI has discussed all the non-compliance issues with the staff and instructed them to follow the approved protocol as it is written. To ensure that noncompliance of a similar nature does not happen again, the PI will monitor surgical logs for any surgical activity once a week during the weekly laboratory

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john.manning@vanderbilt.edu

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October 10, 2018

Re: Animal Welfare Assurance
#A3227-01 (OLAW Case 5I)

Dr. John F. Manning, Jr.
Chief Operating Officer
Vanderbilt University Medical Center
D-3300 Medical Center North
11611 21st Avenue South
Nashville, Tennessee 37232-2104

Dear Dr. Manning,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your September 26, 2018 letter reporting the suspension of an animal activity at Vanderbilt University, following up on an initial telephone report on the same day. According to the information provided, OLAW understands that the Institutional Animal Care and Use Committee (IACUC) took this action after determining that mice were singly housed in an unapproved location for one month, protocol required analgesics were not given, surgical records were not maintained, the approved method of anesthesia was not given, non-pharmaceutical grade anesthesia was used, and controlled drug use was not documented.

The corrective actions consisted of the IACUC suspending the protocol and contacting the Principal Investigator. The PI provided a corrective plan, the IACUC reinstated the protocol, and the laboratory was placed under enhanced post-approval monitoring (PAM).

In order for OLAW to have a complete understanding of the facts involved in this case, please provide the following additional information:

- 1) Was the NIH funding component contacted about the suspension?
- 2) Did the institution ensure that the grant was not charged for any experimental animal activities during the period of suspension?
- 3) Did the mice experience pain or distress due to not receiving the required analgesics?
- 4) Provide a detailed accounting of the corrective actions taken by the PI to prevent a recurrence of the noncompliance.
- 5) Provide information on the relevant findings of the PAM review.
- 6) Provide information on how the IACUC ensures that all individuals are adequately trained before conducting animal activities.
- 7) Provide any additional information on the effectiveness of the corrective actions to prevent a recurrence.

Please provide the requested information by **October 31, 2018**.

Sincerely,

(b) (6)

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

cc: IACUC Chair
Director of Animal Welfare



September 26, 2018

*John F. Manning, Jr., Ph.D., MBA
Chief Operating Officer
Corporate Chief of Staff*

Axel Wolff, MS, DVM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
Rockledge One, Suite 360
6705 Rockledge Drive – MSC 7982
Bethesda, MD 20892-7982

Regarding: Vanderbilt University Medical Center - Assurance #A-3227-01

Species Involved: Mouse

Funding Source: NIH: R01 NS097898

Dear Dr. Wolff:

In accordance with PHS Policy IV.F.3.a, Vanderbilt University Medical Center (VUMC)/ Vanderbilt University (VU) or the Department of Veterans Affairs Tennessee Valley Healthcare System (TVHS) Institutional Animal Care and Use Committee (IACUC) is self-reporting an incident involving housing animals in an unapproved location, not providing analgesics and other items not consistent with the approved protocol or institutional policies. A preliminary report was filed via phone with OLAW on July 26, 2018.

This is the final report provided to the Office of Laboratory Animal Welfare (OLAW) regarding the issue.

Incident Description: During the July semi-annual IACUC inspection, the inspection team identified the following items of non-compliance within a laboratory:

- Housing of singly-caged mice outside the centralized animal facility in an unapproved location for up to four weeks;
- Not providing analgesics as approved in the protocol;
- Failure to maintain surgical records for animals that had undergone survival surgery;
- Not using the approved method of anesthesia;
- Use of non-pharmaceutical grade xylazine; and
- Failure to adequately document controlled substance use.

The inspectors, and subsequent follow-up by Post-approval Monitors (PAM), did not find any additional instances of animal welfare concerns associated with these deficiencies.

IACUC Actions Taken and Corrective Plans:

This information was brought to the attention of the IACUC at a convened meeting on July 25, 2018. As a result, and after deliberation of a quorum of members present

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at the meeting, the IACUC voted to suspend the protocol. The IACUC requested that the PI present a plan to prevent these types of issues and attend the August 22 IACUC meeting. The committee voted that the issue was reportable to OLAW.

Implementation of Changes:

In written correspondence to the IACUC dated August 10th and at the August 22, 2018 IACUC meeting, the PI addressed the Committee's concerns. The IACUC discussed the PI's responses to the incident and found the PI addressed the concerns and provided an appropriate plan to prevent recurrence of the issue. The IACUC was satisfied with the PI's response and voted to reinstate the protocol. In addition, the IACUC requested that the PAM conduct a review of all the PI's protocols, provide mentoring and training to the PI and laboratory staff regarding protocol adherence and relevant SOPs and policies, and increase monitoring of the PI's animal research activities for the next three months.

As always, Vanderbilt University Medical Center, Vanderbilt University and the Department of Veterans Affairs Tennessee Valley Healthcare System remain committed to the highest standards of compliance related to the humane use of animals in research, teaching and testing.

Please do not hesitate to contact me or Dr. Scott Bury at (b) (6) with any questions.

Sincerely,

(b) (6)

John F. Manning, Jr., PhD, MBA
Institutional Official

cc:

(b) (6)

Scott D. Bury, PhD, CPIA, Director, OAWA
Ronald B. Emeson, PhD, IACUC Chair
James R. Swearingen, DVM, DACLAM, Global Director, AAALAC International
Jeanne M. Wallace, DVM, DACLAM, Attending Veterinarian

Morse, Brent (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Monday, October 01, 2018 9:44 AM
To: (b) (6) OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: VUMC Final Letters A-3227 01

Thank you for providing these final reports (b) (6) We will send official responses soon.

Best regards, Brent Morse

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

Please note that this message and any of its attachments are intended for the named recipient(s) only and may contain confidential, protected or privileged information that should not be distributed to unauthorized individuals. If you have received this message in error, please contact the sender.

From: (b) (6)
Sent: Friday, September 28, 2018 11:16 AM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: (b) (6)
Subject: VUMC Final Letters A-3227 01

Good Morning,
Please find attached four final letters from VUMC.
Let me know if you have any questions or need anything further.
Regards,
(b) (6)

(b) (6)



Initial Report of Noncompliance

By: AW

Date: 7/26/18

Time: 1:00

Name of Person reporting: Scott Bury

Telephone #: (b) (6)

Fax #: [REDACTED]

Email: [REDACTED]

Name of Institution: Vanderbilt U

Assurance number: A3227

Did incident involve PHS funded activity? Yes

Funding component: [REDACTED]

Was funding component contacted (if necessary): [REDACTED]

What happened?

6. Eyelid protocol, also done in past on reverse light cycle but not approved. No surgery done, no analgesia given, isoflurane used + not on protocol, used chemical grade xylazine.

Species involved: mouse

Personnel involved: [REDACTED]

Dates and times: [REDACTED]

Animal deaths: [REDACTED]

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

IACUC suspended protocol. Post-doc not adequately trained.

Projected submission to OLAW of final report from Institutional Official: [REDACTED]

OFFICE USE ONLY

Case # [REDACTED]