



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

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Office of Laboratory Animal Welfare  
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Home Page: <http://grants.nih.gov/grants/olaw/olaw.htm>

FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare  
Rockledge One, Suite 360  
6705 Rockledge Drive  
Bethesda, Maryland 20817  
Telephone: (301) 496-7163  
Facsimile: (301) 402-7065

April 3, 2018

Re: Animal Welfare Assurance  
A3085-01 [OLAW Case 1D]

Dr. Theodore F. Taraschi  
Vice President for Research  
Thomas Jefferson University  
1020 Locust Street  
Philadelphia, PA 19107

Dear Dr. Taraschi,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your March 26, 2018 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Thomas Jefferson University, following up on an initial December 18, 2017 email notification. According to the information provided, OLAW understands that one cage containing thirty seven rats were left unsupervised by a laboratory affiliate while being inappropriately euthanized via carbon dioxide (CO<sub>2</sub>) asphyxiation. It was also determined that the responsible laboratory associate placed some animals into a chamber pre-charged with CO<sub>2</sub> and failed to perform a secondary method to assure death contrary to institutional policy and the recommendations of the AVMA Guidelines on Euthanasia: 2013 Edition. A thoracotomy was immediately performed on all thirty seven animals upon discovery of the incident.

The corrective actions consisted of immediately restricting the performance of euthanasia by laboratory personnel, retraining all laboratory staff on rodent CO<sub>2</sub> euthanasia, the IACUC Regulatory Affairs Manager observing laboratory personnel perform euthanasia and subsequently reinstating the laboratory's privilege to perform the euthanasia procedure, amending the two relevant protocols and counseling the two Principal Investigators and responsible associate on the noncompliance with an emphasis on preventing future recurrence

Your prompt and thorough resolution of this matter is commendable and consistent with the PHS philosophy of monitored self-regulation. We appreciate having been informed about this matter and find no cause for further action by this Office.

Sincerely,

(b) (6)

Neera V. Gopee, DVM, PhD, DACLAM, DABT  
Animal Welfare Program Specialist  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare

cc: IACUC Chair

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

**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Tuesday, March 27, 2018 11:30 AM  
**To:** (b) (6) OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** Theodore Taraschi  
**Subject:** RE: [A3085-01] TJU Final Report - 171218

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

Regards, Brent Morse

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

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**From:** (b) (6)@jefferson.edu]  
**Sent:** Monday, March 26, 2018 6:13 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Theodore Taraschi <Theodore.Taraschi@jefferson.edu>  
**Subject:** [A3085-01] TJU Final Report - 171218

Dear Dr. Morse and the Office of Laboratory Animal Welfare,

On behalf of Dr. Theodore Taraschi, Institutional Official, I am writing to provide the final report for an incident of noncompliance at Thomas Jefferson University. (See attached.) Please don't hesitate to contact us if you have any questions or concerns.

Sincerely,

(b) (6)



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**Ward, Joan (NIH/OD) [E]**

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**From:** (b) (6)@jefferson.edu>  
**Sent:** Monday, December 18, 2017 8:58 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** (b) (6)  
**Subject:** [A3085-01] Preliminary Report

Dear OLAW,

Please accept this e-mail as a preliminary notification of a reportable offense that has been recently identified at our institution.

**Name and Contact Information of Person Reporting:**

(b) (6)

**Name of Institution:** Thomas Jefferson University

**Assurance Number:** D16-00051 (A3085-01)

**Funding Component and If Contacted:** Internally Funded

**Brief Description of Incident (e.g., species, category of personnel involved, dates, times, animal deaths):** On December 1, 2017, the Clinical Veterinarian was made aware of an incident involving improper euthanasia of rats. Thirty-seven rats were euthanized in a rat cage using carbon dioxide, and subsequently left unattended with a note indicating that the individual would return shortly. The individual was a member of an investigator's laboratory. Jefferson policy requires the use of a secondary physical method of euthanasia to confirm death, which was clearly not performed and the large number of animals in the cage raised concerns about the technique. The Clinical Veterinarian and Post-Approval Monitor immediately visited the laboratory to inquire. After speaking with the responsible individual, it was determined that some animals were being placed into the chamber pre-charged with carbon dioxide. The research staff member was asked to immediately perform a thoracotomy on all 37 animals.

**Plan and Schedule for Correction and Prevention (if known):** The laboratory was immediately asked not to euthanize any more animals, and complied. The IACUC Chair, Attending Veterinarian, IACUC Regulatory Affairs Manager, and the Post-Approval Monitor made another visit to the laboratory on December 4 to speak with the PI regarding the incident. A retraining session on carbon dioxide euthanasia procedures for rats and mice took place for all animal users within the laboratory on December 7 overseen by the Clinical Veterinarian and the Post-Approval Monitor. On, December 11, members of the laboratory performed euthanasia under observation by the IACUC Regulatory Affairs Manager. The laboratory has since been permitted to euthanize animals again. Corrective and preventative actions are expected to include protocol modifications and increased monitoring of the laboratory. Additional discussion will take place at the upcoming IACUC meeting.

**Timeframe for Final Report from the Institutional Official:** A final report should be submitted within 90 days.

Sincerely,  
(b) (6)



(b) (6)

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