



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, MD 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

July 30, 2018

Re: Animal Welfare Assurance  
A3079-01 [OLAW Case 30]

Dr. Dawn A. Bonnell  
Vice Provost for Research  
University of Pennsylvania  
1 College Hall, (b) (4)  
Philadelphia, PA 19104-6303

Dear Dr. Bonnell,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your July 26, 2018 letter reporting a noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of Pennsylvania. According to the information provided, OLAW understands that 26 out of 40 cowbirds housed in an outdoor flight cage at your New Boulton Center site were found dead. The water bowls were empty and it appeared the cause of death was dehydration. The remaining birds were relocated and survived. Apparently the incident was related to unusually hot weather and the birds using the water bowls as water baths. They splashed the water out of the bowls. The animals were assigned to work funded by NSF grant 1557499.

Corrective and preventive actions included keeping the flight cage closed until the fall. The number of birds in the cage will be limited to 30 and additional water stations will be added. Water bowls will be replaced by water trays to increase volume and allow the birds to bathe without great water loss. The cage will be moved from concrete to grass to keep the area cooler and more shade panels will be added to the cage. The cage will be checked more frequently.

The prompt consideration of this matter by the University of Pennsylvania and the PI was consistent with the philosophy of institutional self-regulation. Similarly, the actions taken to resolve the issue and to prevent recurrence were appropriate. We appreciate being informed of this matter and find no cause for further action by this office at this time.

Sincerely,

(b) (6)

Brent C. Morse, DVM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare

cc: IACUC contact  
NSF Animal Welfare Officer



**Office of the Vice Provost for Research**

Axel V. Wolff, MS, DVM  
Deputy Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
RKL 1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, MD 20892-7982

University of Pennsylvania  
A3079-01

July 26, 2018

Dear Dr. Wolff,

We wish to report an incident with cowbirds (*Molothrus ater*) housed in an outdoor flight cage (8' long x 4' wide x 8' high) at our New Bolton Center site. The work was funded by a NSF grant 1557499. During a daily check, 26 birds out of 40 were found dead. The health of the surviving birds was immediately addressed and a ULAR veterinarian was contacted. The water bowls were empty and it appeared the cause of death was due to dehydration. All the remaining 14 birds all survived and were relocated. The flight cage was taken out of service during the investigation of the incident.

The PI self-reported the issue to the IACUC Chair and Office of Animal Welfare compliance staff. An investigation by the PI and the veterinarian concluded that there was adequate drinking water provided in water bowls the day before. However, since it was an unusually hot day, the birds used the water bowls as water baths and splashed out the water. The birds quickly became dehydrated. The investigation had a number of recommendations, many of which were PI-suggested preventative measures:

- The number of birds in the cage will be limited to 30;
- The water bowls will be replaced by water trays which have an increased volume and makes it easier for bird bathing behavior without great water loss;
- Additional water station locations will be added;
- Move the cage over grass instead of concrete to keep the area cooler;
- Add more shade panels to the cage;
- Increase frequency of checks on the cage.

Additionally, the PI will keep the flight cage closed for the summer but may consider using it in the fall.

The recommendations were accepted by the PI and the IACUC compliance subcommittee. The IACUC was updated at the next regularly scheduled IACUC meeting.

Sincerely yours,

(b) (6)

Dawn Bonnell, PhD  
Vice Provost for Research  
Trustee Professor of Materials Science and Engineering  
Institutional Official

CC: IACUC Chair, University of Pennsylvania  
Attending Veterinarian and ULAR Director, University of Pennsylvania  
Director of Animal Welfare, University of Pennsylvania

1 College Hall, Suite 118, Philadelphia, PA 19104-6381  
Tel 215-898-7236 Fax 215-573-2108 <http://www.upenn.edu/research>

**Wolff, Axel (NIH/OD) [E]**

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, July 27, 2018 7:03 AM  
**To:** Reinhard, Gregory R  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Penn Self-Report Non-Compliance

Thank you for these reports, Dr. Reinhard. We will send responses shortly.  
Axel Wolff

**From:** Reinhard, Gregory R [mailto:reingr@upenn.edu]  
**Sent:** Thursday, July 26, 2018 5:30 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** Penn Self-Report Non-Compliance

Attached please find two self-reports from the University of Pennsylvania D16-00045.

Please contact me if you have any questions.

Regards,  
Greg Reinhard

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