



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

November 21, 2018

Re: Animal Welfare Assurance
A3222-01 [OLAW Case T]

Aleister Saunders, Ph.D.
Senior Vice Provost for Research
Drexel University
3180 Chestnut Street, (b) (4)
Philadelphia, PA 19104

Dear Dr. Saunders,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your October 12, 2018 letter reporting two instances of noncompliance with institutional guidelines and Standard Operating Procedures (SOPs) at Drexel University. According to the information provided, OLAW understands the following about the two NSF funded (award number 1751898) incidents and the corresponding corrective actions which have been taken:

- 1) On September 24, 2018, a research fellow attempted to enter a barrier animal housing room, instead of the hazardous containment area, with a cage housing mice that had been injected with a hazardous chemical agent. The corrective actions included meeting and reviewing with responsible laboratory personnel to discuss the noncompliance and the locations for hazardous cage containment, proposing a buddy system for all animal activities so as to avoid future errors and scheduling bi-weekly meetings to discuss compliance with IACUC guidelines and the approved protocol.
- 2) The same laboratory later failed to appropriately bag and identify contaminated cages for disposal in accordance with institutional Standard Operating Procedures on October 2, 2018. A system was implemented which involved the placement of dirty and chemically hazardous cages on a designated cart within the chemical hazard housing room for facility care staff to appropriately bag and transport for disposal. The IACUC also mandated retraining of the Principal Investigator and all laboratory staff. OLAW further understands that continuing noncompliance by the laboratory will result in escalating sanctions.

Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate, correct and prevent recurrence of the noncompliance. We appreciate being informed of these matters and find no cause for 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
NSF Animal Welfare Officer



October 12th, 2018

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:

Drexel University, in accordance with Assurance D16-00138 and PHS Policy IV.F.3., provides this report of noncompliance of a researcher entering a barrier animal housing room with a cage containing animals injected with a chemical hazard and a failure to follow proper procedure for hazardous cage disposal. The work performed on this protocol is supported by National Science Foundation award number 1751898.

On 9/24/2018, an animal welfare report was received regarding a researcher who had attempted to house mice treated with a chemical hazard in a barrier housing room rather than in the animal room designated for hazard containment. The facility manager contacted the Principal Investigator the same day to make them aware of the situation.

On 9/25 the IACUC Chair also wrote a letter to the Principal Investigator detailing the concerns. The Principal Investigator responded on 10/1 further describing the incident and included the following action plan to prevent further incident:

- A meeting was held on 9/25 with all the members of the research laboratory to make every member aware of the incident and to emphasize the seriousness of the situation. The laboratory reviewed the animal facility floor layout and the locations for the hazardous cage containment..
- The laboratory proposed that all activities in the animal facility will be carried out by at least 2 persons in a buddy system so as to prevent any additional mistakes or confusion.
- The laboratory will hold regular meetings on a bi-weekly basis with all laboratory members to discuss compliance with IACUC guidelines and ensure all members fully understand the protocol (including amendments).

On 10/2 the facility care staff noted the laboratory failed to comply with proper chemical hazard cage disposal by not properly bagging and identifying cages for disposal. As an immediate response, the facility care staff implemented a new system where the laboratory places dirty chemical hazard cages on a designated cart within the chemical hazard animal housing room. The facility care staff has assumed responsibility for appropriate bagging and transportation of dirty cages from the designated cart to the appropriate disposal area.

On 10/2 the Animal Welfare Analyst met with a subset of the laboratory. They discussed plans for additional training and access to appropriate Standard Operating Procedures for cages containing hazardous material.

On 10/10 the IACUC met at a regularly convened meeting to discuss the incidents and voted to approve the following plan of action:

- The IACUC will accept the Principal Investigator's response letter to the initial incident and accept the actions noted.
- The IACUC Chair will write a second letter to the Principal Investigator, noting the subsequent violation. The letter will mandate retraining for both the Principal Investigator and all laboratory members. This training will be conducted by both the Animal Welfare Analyst and Facility Manager.
- The letter will also notify the laboratory that further violations could lead to additional sanctions.

Drexel University 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 Michael O'Connor, MD, PhD, IACUC Chair or Richard Huneke, DVM, attending veterinarian.

Thank you for your consideration of this matter.

(b) (6)

Aleister Saunders, Ph.D.
Senior Vice Provost for Research
Institutional Official

Gopee, Neera (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Tuesday, November 20, 2018 12:18 PM
To: 'Iacuc'; OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Report of Non-Compliance- Drexel University- D16-00138

Thank you for this final report (b) (6) We will send an official response soon.

You do the same.

Best Regards,
Neera

Neera V. Gopee, DVM, PhD, DACLAM, DABT
Veterinary Medical Officer
Office of Laboratory Animal Welfare
National Institutes of Health

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From: Iacuc [mailto:iacuc@drexel.edu]
Sent: Monday, November 19, 2018 2:44 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Subject: FW: Report of Non-Compliance- Drexel University- D16-00138

Hi,

As per our phone conversation today, I am re-sending this report of non-compliance. Please let me know if you need any additional information.

Thank you again and I hope you have a wonderful Thanksgiving holiday.

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(b) (6)

From: Iacuc
Sent: Monday, October 15, 2018 10:16 AM