



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

March 28, 2019

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

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 March 13, 2019 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Drexel University. According to the information provided, OLAW understands that a Principal Investigator (PI) failed to respond when informed that an animal (mouse?) had a prolapsed uterus, overcrowded the CO2 euthanasia chamber, and failed to conduct a secondary physical method of euthanasia to ensure death. In addition, cages had not been labeled with contact information and the animal housing area had not been cleaned up following animal work. The animal activities are supported by NSF grant #1751898.

The immediate action taken upon discovery consisted of the Attending Veterinarian directing euthanasia of the affected animal. The students involved were retrained on the appropriate conduct of euthanasia and on contacting the veterinarian concerning animal health issues. The animal use privileges were suspended for the two students responsible. All laboratory staff was counseled, the PI submitted a corrective action plan to the Institutional Animal Care and Use Committee (IACUC), the suspended students must undertake online and in-person retraining, upon completion the students will have their animal use privileges restored but will be placed on probation, the PI must closely supervise the students, the students must work with partners, and if all work is conducted appropriately the IACUC will lift the probation. A detailed cage card template was developed by the laboratory to identify responsible laboratory staff and special handling instructions.

Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate, correct, and prevent recurrence of the noncompliance. Please remember to always specify the species of animal involved. 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  
NSF Animal Welfare Officer



A3222-V

March 13th, 2019

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 Principle Investigator (PI) who failed to take appropriate action upon notification that an animal in their colony had a prolapsed uterus. The researcher also failed to provide appropriate euthanasia conditions by overcrowding the carbon dioxide chamber and did not perform a required second form of euthanasia. The work performed on this protocol is supported by National Science Foundation award number 1751898.

On 2/27/2019, the Animal Facility Manager sent an email to the PI and their laboratory members requiring prompt attention to the health and welfare of specific animals within their colony. The lab performed most of the requested actions, but failed to provide appropriate care for an animal with a prolapsed uterus. The Animal Facility Manager recommended euthanasia. The student in charge of that research project had left the lab a few days prior and the remaining lab members failed to recognize the severity of the condition and did not seek further veterinary consultation or euthanize the animal. The morning of the following day, the animal care staff, acting under the orders of the Attending Veterinarian, euthanized the animal.

On 3/8/2019, the PI submitted a self-report of noncompliance to the Drexel IACUC. Following this notification, the Animal Welfare Analyst arranged a formal meeting with the PI and lab staff to discuss the incidents and develop an appropriate plan of action.

The self-report also identified that the lab had failed to provide adequate euthanasia conditions by overcrowding the carbon dioxide chamber. On 2/27/2019 two students, working on an established buddy system, euthanized approximately 60-70 animals. The students euthanized 6-8 animals in the same chamber per cycle, violating the established maximum of 5 animals per chamber per cycle. On 2/28, the animal care staff notified the

lab that the students failed to perform cervical dislocation (approved second method of euthanasia) on approximately 20 animals. The student who failed to perform the cervical dislocation received training on euthanasia procedures from the university's animal trainer staff at two different training sessions.

The lab also identified that their animal cages had not been labeled with the appropriate contact information and that they had not cleaned up after working in the animal housing room; the food bin was left uncovered, ripped plastic bags were not cleaned up, and the hood was dirty.

The PI arranged a formal meeting the lab and discussed the importance of following animal care staff recommendations or obtaining further veterinary consultation on animal health issues in a timely manner.

On 3/13/2019 the IACUC committee reviewed at a convened meeting the non-compliance report and voted to accept the report and require the actions subsequently outlined. The school dean will also be notified of the noncompliance and required preventative actions.

Due to the severity of the risk to animal welfare and a prior history of non-compliance, the Director of Laboratory Animal Resources, under the guidance of the IACUC, revoked access to the animal facility from the two students involved with the non-compliance. The PI, under the recommendation of the IACUC, voluntarily suspended those two students from all animal work. The following steps will be required before the students can regain facility access:

- The entire lab will meet with the IACUC Chair and Attending Veterinarian.
- The PI will submit a written response (email) to the IACUC and include a plan for student compliance.
- The suspended students will be required to undergo CITI re-training and full species specific re-training with animal facility trainers.
- The suspended students will be required to attend a Common Breeding Issues training developed by the Animal Welfare Analyst and animal facility trainers to educate them on the importance and severity of such diseases as a uterine prolapse, etc. The PI and other lab members are encouraged to attend.
- The written response and training certificates will be reviewed and approved by the IACUC committee. Should the IACUC agree that the students are properly trained and overseen by the PI, the students will receive animal facility access.
- Once the two students regain facility access, the IACUC may recommend that the PI lift the suspension on animal work and place them on probation.
- The PI will be required to directly approve any animal work performed by the two students during this probation period. The PI will also be required to check, via an established checklist, all work performed by those students. The probation period will last for a minimum of two months.
- Following the two month probation, The PI will submit a statement to the IACUC notifying them that the students have satisfactorily maintained compliance. At that

point the IACUC may determine that the probation will be lifted. The two students must continue to follow an established buddy system with other senior lab members, in which the partner student confirms all work has been appropriate completed.

The lab also developed a detailed cage card template to identify responsible lab members and special handling instructions which will be used on all cages. This cage card template was reviewed by the IACUC and animal care staff and determined to be appropriate.

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  
Professor, Department of Biology  
Institutional Official

1505 Race Street, Bellet Building, 10th floor IACUC@drexel.edu | drexel.edu/research Philadelphia, PA 19102 | Tel: 215.876.2913

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

---

**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, March 22, 2019 10:44 AM  
**To:** Iacuc  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Drexel University- D16-00138 Report of Non-Compliance (NSF grant 1751898) and Update Report

Thank you for this report, (b) (6) We will respond soon.

Axel Wolff, M.S., D.V.M.  
Deputy Director, OLAW

---

**From:** Iacuc <iacuc@drexel.edu>  
**Sent:** Friday, March 22, 2019 10:09 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Saunders,Aleister <ajs56@drexel.edu>; (b) (6)  
Huneke,Richard <rbh25@drexel.edu>; OConnor,Michael <oconnomp@drexel.edu>  
**Subject:** Drexel University- D16-00138 Report of Non-Compliance (NSF grant 1751898) and Update Report

Hello,

Drexel University (Assurance D16-00138) would like to self-report a non-compliance relating to NSF Grant 1751898. Please see the attached letter with a description of the incident and the actions taken in response.

We have also attached an updated report with additional actions taken by the IACUC to prevent the use of expired drugs in laboratory animals.

Please let me know if you need any additional information.

Thank you,  
(b) (6)

(b) (6)