



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

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  
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April 12, 2017

Re: Animal Welfare Assurance  
A3439-01 [OLAW Case N]

Dr. Michael Pazzani  
Vice Chancellor for Research and  
Economic Development  
University of California-Riverside  
Office of Research and Economic Development  
Riverside, CA 92521

Dear Dr. Pizzani,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your letter in this office April 7, 2017 reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of California, Riverside. According to the information provided, OLAW understands that on March 9, 2017 it was determined that rats in a laboratory class project did not receive post-surgical analgesia as required. The instructor, who was responsible for giving the analgesia, left the class before the surgeries were completed the night before, expecting that the TAs would administer the analgesia. One animal was found in apparent pain and was euthanized. The PI then administered the analgesic to the remaining 12 rats. The animal activity involved is not funded by the PHS.

Corrective actions included counseling the PI who took full responsibility for the oversight. In addition, the AUP was modified to allow the TAs to administer the analgesic. The instructor and TAs will also be retrained in "Post-Procedural Care of Mice and Rats in Research; Minimizing Pain and Distress". The Campus Veterinarian and/or the IACUC Chair will observe the part of the class involving student surgeries when next conducted.

OLAW appreciates the prompt consideration of this matter by the University of California, Riverside, which was consistent with the philosophy of institutional self-regulation. Based on the information provided, OLAW is satisfied that appropriate corrective and preventive measures have been put in place. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

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

cc: IACUC Contact

Dr. Axel Wolff  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare

Dear Dr. Wolff,

The University of California, Riverside, in accordance with Assurance A3439-01 and PHS Policy IV.F.3., provides this report of noncompliance regarding an incident where rats did not receive the initial dose of analgesia, which was required by the Animal Use Protocol "Laboratory in Neuroscience" approved 1/26/15. We have reviewed this incident in accordance with UCR IACUC procedures for such investigations (<http://or.ucr.edu/about/policies-ucr.aspx?k=81>).

The non-compliance involves a laboratory class project where students implant neural cannula in rats. The project encompasses three class days (not contiguous). In the first, the instructor demonstrates the surgery. In the second, the students perform the surgery. In the third, the cannula are used to introduce compounds such that the students can monitor effects on feeding behavior. It is noted that this laboratory class has been observed previously, and the instructor and teaching assistant's monitoring of the student surgeries have been found acceptable. On March 9, 2017, the morning following the second day (student surgeries), vivaria staff identified an animal in apparent pain and without documented analgesia. That animal was euthanized. The AUP indicates analgesia should be administered, specifically by the instructor. The instructor was contacted that morning and he noted he had had to leave the class before the surgeries were complete the night before and expected that the TAs had provided the analgesia. The PI then administered analgesia to the twelve remaining animals as per the protocol. Concerns raised include the communication between the instructor and TAs, the instructor's confusion regarding specific points in the AUP, and the instructor and TA training in recognizing pain and distress in the animals.

No federal funds were used to support the animals used in this laboratory class and the non-compliance has no impact on federally funded activities.

The PI has been notified of the review and has provided the following statement: "The information in the report is accurate and I alone am responsible for the failure to appropriately treat the subjects, as well as for failing to appropriately comply with the stipulations of my AUP. I regret those failures and agree to the suggested consequences."

**We are applying the following corrective and preventative actions:**

The IACUC has considered the situation and identified corrective action for the investigators involved, as well as for the animal program. The AUP will be revised to include training in the administration of analgesia by the instructor to the course TAs, and administration of analgesia by the TAs. Both instructor and TAs will be required to complete the AALAS Learning Library on-line course "Post-Procedure Care of Mice and Rats in Research: Minimizing Pain and Distress". The Campus Veterinarian and/or IACUC Chair will observe part of the class involving student surgeries (when the course is next offered). Vivaria staff will continue to provide oversight of these animals following surgery.

Sincerely,



Michael Pazzani, Ph.D.  
Vice Chancellor for Research & Economic Development

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, April 07, 2017 1:14 PM  
**To:** Secondary Individual  
**Subject:** RE: UCRiverside noncompliance report

Thank you for this report, Secondary Individual. We will respond soon.  
Axel Wolff

**From:** Secondary Individual [mailto:Secondary Individual@ucr.edu]  
**Sent:** Friday, April 07, 2017 1:02 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Michael Pazzani <michael.pazzani@ucr.edu>; Secondary Individual @ucr.edu; Secondary Individual @ucr.edu;  
Secondary Individual @ucr.edu; Secondary Individual @ucr.edu; Secondary Individual @ucr.edu  
**Subject:** UCRiverside noncompliance report

Dear Dr. Wolff,

The University of California, Riverside is reporting a non-compliance in the attached letter. The incident has been investigated and corrective measures identified. If you have any questions or recommendations please contact me.

Best,  
Secondary Individual  
IACUC Analyst  
Phone Number

Office of Research Integrity  
University of California  
Riverside, CA 92521