



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare  
Rockledge One, Suite 360  
6705 Rockledge Drive – MSC 7982  
Bethesda, Maryland 20892-7982  
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

February 28, 2017

Re: Animal Welfare Assurance  
#A3120-01 (OLAW Case I)

Joshua J. Jacobs, M.D.  
Associate Provost for Research  
Rush University Medical Center  
Orthopedic Building, Room #  
1611 West Harrison St.  
Chicago, IL 60612-3823

Dear Dr. Jacobs,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your February 17, 2017 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Rush University Medical Center, following up on an initial report on December 9, 2016. According to the information provided, OLAW understands that mice underwent various procedures which had not been approved by the Institutional Animal Care and Use Committee (IACUC) including:

- 1) intra-articular morphine injections
- 2) modified medial meniscus surgery
- 3) adenoviral vector injections (this had also not been approved by the Institutional Biosafety Committee)
- 4) surgery by personnel without documented training and not listed on the protocol
- 5) circadian rhythm disruption
- 6) intra-articular injections in an unapproved strain of mice
- 7) intra-articular injections of unapproved anti-NGF antibody and biotin-conjugated NGF
- 8) induction of degenerative disc disease in an unapproved strain of mice
- 9) intra-articular injections of HA-TCA and HA-Pazopanib
- 10) conduct of various surgical procedures

The corrective actions consisted of the IACUC directing the Principal Investigator (PI) to stop all animal activities except breeding colony maintenance, to identify two additional contacts for the animal studies, to provide laboratory staff with copies of the complete protocols, to submit three new protocols and five amendments for IACUC review, and to resign as an IACUC member. The PI and staff were counseled on the requirement for IACUC approval prior to implementing any animal activities and to ensure that staff is adequately trained to perform the activities. The Institutional Official suspended the PI's animal use privileges and the PHS-funded animal activities were transferred to other investigators and the NIAMS Chief Grants Manager was notified of this. The grant has been adjusted for all unauthorized animal expenses. If the PI resumes animal activities further retraining and auditing will take place.

*Page 2 - Dr. Jacobs*  
*February 28, 2017*  
*OLAW Case A3120-1*

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 having been informed about this matter and find no cause for further action by this Office.

Sincerely,



Axel Wolff, M.S., D.V.M.  
Director  
Division of Compliance Oversight

cc: IACUC Chair  
Melinda Nelson, NIAMS Chief GMO

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

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**From:** Nelson, Melinda (NIH/NIAMS) [E]  
**Sent:** Tuesday, February 28, 2017 11:27 AM  
**To:** Ward, Joan (NIH/OD) [E]  
**Subject:** FW: OLAW Case A3120-I  
**Attachments:** 1223\_001.pdf

Just a quick note – the grant has not YET been adjusted to remove unauthorized animal expenses. We are in the process of getting a list of the unallowable charges and I am working with the OPERA Compliance Division to prepare a “demand” letter. I think this statement might confuse the institution, since they are still working with me. Thanks.

*Melinda Nelson*

Acting Director, Division of Extramural Research Activities  
National Institute of Arthritis and Musculoskeletal and Skin Diseases  
National Institutes of Health  
6701 Democracy Boulevard, Suite 838  
Bethesda, Maryland 20892  
Phone: (301) 435-5278  
Fax: (301) 480-5450

*Effective October 1, 2014, NIH closeout policy has changed (see [NOT-OD-14-084](#)). In order to avoid unilateral closeout, the final progress report, final invention statement and final Federal financial report must be submitted in a timely manner. Be reminded that financial reconciliation upon completion of an award includes ensuring that the balances of expenditures and unobligated funds reported on the final expenditure FFR match those amounts as reported in the last federal cash report submitted to the Payment Management System. Failure to submit accurate final reports could result in enforcement actions such as revisions to NoA funding levels or delays in future funding.*

**From:** Ward, Joan (NIH/OD) [E]  
**Sent:** Tuesday, February 28, 2017 11:19 AM  
**To:** joshua\_jacobs@rush.edu  
**Cc:** tom\_schmidt@rush.edu; Nelson, Melinda (NIH/NIAMS) [E] <nelsonm@exchange.nih.gov>  
**Subject:** OLAW Case A3120-I

Dear Dr. Jacobs,

Attached please find Dr. Axel Wolff's final response to OLAW Case A3120-I.

If you have any questions, feel free to contact us by phone or by email.

Regards,  
Joan

Institutional Animal Care and Use Committee  
1735 W. Harrison St  
Cohn Building Suite 206  
Chicago, Illinois 60612-3824

Tel. 312.563.3374  
Fax 312.563.3377  
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Rush University  
College of Nursing  
Rush Medical College  
College of Health Sciences  
The Graduate College



**RUSH UNIVERSITY MEDICAL CENTER  
INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE**

February 17, 2017

Axel Wolff, M.S., D.V.M.  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
RKL1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, MD 20892-7982

RE: Research Non-Compliance, Hee-Jeong Im Sampen, PhD, Professor, Biochemistry  
AWA# A-3120-01

Dear Dr. Wolff:

This final report is being submitted in accordance with the *Public Health Service's Policy on the Humane Care and Use of Laboratory Animals*. Section IV. F. 3.a., states: "The IACUC, through the Institutional Official, shall promptly provide OLAW with a full explanation of the circumstances and actions taken with respect to any serious or continuing deviations of this policy."

On December 9, 2016, we sent a preliminary report describing the details of allegations of confirmed IACUC noncompliance by a principal investigator who was also an IACUC member. The letter indicated that the PI had voluntarily ceased all animal experimentation and had taken a leave of absence from IACUC membership. The letter further described the allegations, the findings of the IACUC and actions taken by the PI and the IACUC.

In addition, the December 9th letter described the IACUC's recommendation that Dr. Sampen's IACUC membership be revoked. The letter confirmed my formal communication to Dr. Sampen that she step down as a member of the Committee and that I had suspended Dr. Sampen's privileges to perform experiments on research animals indefinitely pending further inquiry into these issues.

Since that time, Dr. Sampen is on a leave of absence. As a result, Dr. Sampen's externally

funded animal activities were transferred to other Rush animal use investigators and these changes were reviewed and approved by the Rush IACUC and have further been communicated and approved by the Chief Grants Management Officer and the National Institutes of Health (NIH). In addition, Rush has conducted an assessment of allowable costs and determined that expense charges were made for unauthorized animal activities where the conduct of animal activities occurred in the absence of a valid Institutional Animal Care and Use Committee (IACUC) approval (pursuant to NOT-OD-07-044 *Allowable Cost for Grant Activities Involving Animals when Terms and Conditions are not Upheld*). On February 15, 2017, Rush communicated this assessment and findings and that report is attached. In summary, the appropriate adjustment to R21AR067935 is \$401.45 and the appropriate adjustment to R01AR062136 is \$43,843.07 [Attachment A].

The Rush Animal Care and Use Program remains committed to the humane care and use of laboratory animals and to compliance with the regulations that govern its use in research. Please contact me, Dr. Oswald [Phone Number], or Dr. Schmid [Phone Number] should you have any questions or require any additional information regarding this final report.

Sincerely,



Joshua J. Jacobs, M.D.  
Associate Provost for Research  
Institutional Official (IO)

cc: Rush Institutional Animal Care and Use Committee  
Comparative Research Center  
[Secondary Individual] CHRC Director, Research Compliance



To: Melinda Nelson  
Grants Management Branch  
Chief Grants Management Officer  
National Institute of Arthritis, Musculoskeletal, and Skin Diseases  
National Institutes of Health (NIH)  
E-mail: [nelsonm@mail.nih.gov](mailto:nelsonm@mail.nih.gov)  
Phone: 301-435-5278

Date: February 15, 2017

Re: Confirmation of Expense Charges on NIH Awards During Periods of Non-Compliance

Dear Ms. Nelson,

On January 12, 2017, Rush University Medical Center (Rush) initially self-reported animal non-compliance that involved two NIH funded projects R21AR067935 and R01AR062136 lead by **secondary Individual** Professor, Department of Biochemistry. In accordance with guidance you kindly offered during a phone discussion with **secondary Individual** on February 8, 2017, and pursuant to NIH Policy NOT-OD-07-044 *Allowable Cost for Grant Activities Involving Animals when Terms and Conditions are not Upheld*, Rush has conducted an assessment of allowable costs and determined that expense charges were made for unauthorized animal activities where the conduct of animal activities occurred in the absence of a valid Institutional Animal Care and Use Committee (IACUC) approval.

Rush defined such expense charges related to its definition of "animal costs" which is considered direct costs that are incurred for the care and husbandry of such animals. To further break down this expense for this purpose, animal costs include: food, bedding, sanitation, the purchase of animals, equipment (e.g., cages) and supplies used during the non-compliant period. The non-compliant period consist of three points in time:

- June 2016
- October 2015 - January 2016
- November 2014

Rush has estimated the appropriate adjustment to R21AR067935 is \$401.45 and the appropriate adjustment to R01AR062136 is \$43,843.07. A full and complete accounting for these balances can be made available to you, or others, as necessary and/or directed.

In cases of non-compliant activities, Rush requires a Corrective Action Plan (CAP) that includes remedial education for the affected investigator (and possibly their staff). In addition, close oversight and monitoring (through auditing) will occur for a period of time until the investigator can demonstrate a

sustainable period of compliant activity. Dr. Sampen is on a leave of absence from Rush and therefore these actions have yet to be applied.

Rush will include a copy of this communication in its final report of this matter to the Office of Laboratory Animal Welfare (OLAW) Division of Compliance Oversight.

Sincerely,

Secondary Individual

Chief Research Administrator & Associate Vice  
President

Secondary Individual

Director, Research Compliance & Research  
Integrity Officer

CC: Joshua J. Jacobs, MD  
Associate Provost for Research  
Rush University Medical Center

Secondary Individual  
Acting General Counsel  
Vice President, Legal Affairs  
Rush University Medical Center

Secondary Individual  
Vice President of Medical Affairs and Principal Business Officer  
Rush University Medical Center

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, February 17, 2017 2:11 PM  
**To:** 'Jeffrey P Oswald'  
**Subject:** RE: Final Noncompliance Report - Rush University Medical Center A-3120-01

Thank you. We'll respond soon.  
Axel Wolff

---

**From:** Jeffrey P Oswald [mailto:Jeffrey\_P\_Oswald@rush.edu]  
**Sent:** Friday, February 17, 2017 12:49 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** JoshuaJacobsRortho <Joshua.Jacobs@rushortho.com>; Jeffrey P Oswald <Jeffrey\_P\_Oswald@rush.edu>; Tom Schmid <Tom\_Schmid@rush.edu>; [REDACTED] <[REDACTED]@rush.edu>; [REDACTED] <[REDACTED]@rush.edu>; [REDACTED] <[REDACTED]@rush.edu>; [REDACTED] <[REDACTED]@rush.edu>  
**Subject:** RE: Final Noncompliance Report - Rush University Medical Center A-3120-01

Dear Dr. Wolff,

Attached, please find the final noncompliance report from Rush University Medical Center (Assurance Number A-3120-01).

Please confirm that you have received this report.

Thank you,

**Jeff Oswald, DVM, DACLAM** | *Senior Director, Comparative Research Center*  
Office of Research Affairs | **Assistant Professor** | Orthopedic Surgery  
Rush University Medical Center | Cohn Research Building, 1735 W. Harrison St., Chicago, IL 60612  
T: [REDACTED] | Cell: [REDACTED] | Rush Pager: [REDACTED]  
E: [Jeffrey\\_P\\_Oswald@rush.edu](mailto:Jeffrey_P_Oswald@rush.edu)



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**From:** OLAW Division of Compliance Oversight (NIH/OD) [mailto:olawdco@od.nih.gov]  
**Sent:** Monday, December 12, 2016 8:31 AM  
**To:** Jeffrey P Oswald  
**Subject:** RE: Preliminary Noncompliance Report - Rush University Medical Center A-3120-01

Thank you for this preliminary report, Dr. Oswald. We will start a new case and look forward to receiving the final report from the IO after the IACUC has completed its investigation.

Axel Wolff, M.S., D.V.M.  
Director, Division of Compliance Oversight  
OLAW

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**From:** Jeffrey P Oswald [mailto:Jeffrey\_P\_Oswald@rush.edu]  
**Sent:** Friday, December 09, 2016 1:16 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>



Cc: JoshuaJacobsRortho <Joshua.Jacobs@rushortho.com>; Jeffrey P Oswald <Jeffrey\_P\_Oswald@rush.edu>; Tom Schmid <Tom\_Schmid@rush.edu>; Secondary Individu Secondary Individu@rush.edu>; Secondary Individu Secondary Individu@rush.edu>; Secondary Individu Secondary Individu@rush.edu>  
**Subject:** Preliminary Noncompliance Report - Rush University Medical Center A-3120-01

Dear Dr. Wolff,

Attached, please find a preliminary noncompliance report from Rush University Medical Center (Assurance Number A-3120-01).

Please confirm that you have received this report.

Thank you,

**Jeff Oswald, DVM, DACLAM** | *Senior Director, Comparative Research Center*  
Office of Research Affairs | **Assistant Professor** | Orthopedic Surgery  
Rush University Medical Center | Cohn Research Building, 1735 W. Harrison St., Chicago, IL 60612  
T: Phone Number | Cell: Phone Number | Rush Pager: Phone Number  
E: [Jeffrey\\_P\\_Oswald@rush.edu](mailto:Jeffrey_P_Oswald@rush.edu)



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

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**From:** Morse, Brent (NIH/OD) [E]  
**Sent:** Thursday, February 02, 2017 10:16 AM  
**To:** Nelson, Melinda (NIH/NIAMS) [E]  
**Subject:** RE: question

Hello Ms. Nelson,

It is the grantee's responsibility to determine what funds, if any, need to be returned to the grant. OLAW only advises them of their responsibility. If you wish to contact Grants Compliance in OER, I suggest reaching out to Joel Snyderman. He is experienced with these issues.

Regards, Brent Morse

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

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**From:** Nelson, Melinda (NIH/NIAMS) [E]  
**Sent:** Friday, January 27, 2017 2:01 PM  
**To:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>  
**Subject:** RE: question

The institution is asking me about next steps in their determining unallowable costs. In my experience they are talking about animal costs expended during the period without valid IACUC approvals. What is the correct protocol for this? Do they work with your office? With Grants Compliance in OER? Thank you for helping me advise them.

*Melinda Nelson*

Chief Grants Management Officer  
National Institute of Arthritis and Musculoskeletal and Skin Diseases  
National Institutes of Health  
6701 Democracy Boulevard, Suite 838  
Bethesda, Maryland 20892  
Phone: (301) 435-5278  
Fax: (301) 480-5450

*Effective October 1, 2014, NIH closeout policy has changed (see [NOT-OD-14-084](#)). In order to avoid unilateral closeout, the final progress report, final invention statement and final Federal financial report must be submitted in a timely manner. Be reminded that financial reconciliation upon completion of an award includes ensuring that the balances of expenditures and unobligated funds reported on the final expenditure FFR match those amounts as reported in the last federal cash report submitted to the Payment Management System. Failure to submit accurate final reports could result in enforcement actions such as revisions to NoA funding levels or delays in future funding.*

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**From:** Nelson, Melinda (NIH/NIAMS) [E]  
**Sent:** Thursday, January 12, 2017 4:31 PM  
**To:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>  
**Subject:** RE: question

Thank you so much for the confirmation!

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**From:** Morse, Brent (NIH/OD) [E]  
**Sent:** Thursday, January 12, 2017 2:41 PM  
**To:** Nelson, Melinda (NIH/NIAMS) [E] <nelsonm@exchange.nih.gov>  
**Subject:** RE: question

Thank you for contacting OLAW Ms. Nelson. Yes, Rush University contacted OLAW on December 9, 2016 and filed an extensive preliminary report. We will allow them reasonable time to complete their investigation and institute corrective and preventive actions. At that time we will expect them to file a final report. Until then, the case remains open with OLAW. If you have further questions, please let us know.

Sincerely, Brent Morse

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

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**From:** Morgan, Eileen (NIH/OD) [E]  
**Sent:** Thursday, January 12, 2017 2:30 PM  
**To:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>; Wolff, Axel (NIH/OD) [E] <WolffA@OD.NIH.GOV>  
**Subject:** FW: question

Forwarding Melinda Nelson, Chief GMO NIAMS, message.

Eileen Morgan  
Director, Division of Assurances  
Office of Laboratory Animal Welfare, NIH  
RKL1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, Maryland 20892-7982  
Phone (301) 451-0384  
Fax (301) 402-7065

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**From:** Nelson, Melinda (NIH/NIAMS) [E]  
**Sent:** Thursday, January 12, 2017 2:04 PM

To: Morgan, Eileen (NIH/OD) [E] <morgane@od.nih.gov>

Subject: question

I have been talking to Rush University about an animal issue on two NIAMS grants to a Dr. Sampen. They tell me that they have notified OLAW about the issue as they are doing an internal investigation. I am just making sure that indeed you all are aware of this. AR 62136 and AR 67935

*Melinda Nelson*

Chief Grants Management Officer  
National Institute of Arthritis and Musculoskeletal and Skin Diseases  
National Institutes of Health  
6701 Democracy Boulevard, Suite 838  
Bethesda, Maryland 20892  
Phone: (301) 435-5278  
Fax: (301) 480-5450

*Effective October 1, 2014, NIH closeout policy has changed (see [NOT-OD-14-084](#)). In order to avoid unilateral closeout, the final progress report, final invention statement and final Federal financial report must be submitted in a timely manner. Be reminded that financial reconciliation upon completion of an award includes ensuring that the balances of expenditures and unobligated funds reported on the final expenditure FFR match those amounts as reported in the last federal cash report submitted to the Payment Management System. Failure to submit accurate final reports could result in enforcement actions such as revisions to NoA funding levels or delays in future funding.*

A3120-I

Institutional Animal Care and Use Committee  
1735 W. Harrison St  
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Rush University  
College of Nursing  
Rush Medical College  
College of Health Sciences  
The Graduate College



**RUSH UNIVERSITY MEDICAL CENTER  
INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE**

December 9, 2016

Axel Wolff, M.S., D.V.M.  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
RKL1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, MD 20892-7982

RE: Research Non-Compliance, Hee-Jeong Im Sampen, PhD, Professor, Biochemistry  
AWA# A-3120-01

Dear Dr. Wolff:

This preliminary report is being submitted in accordance with the *Public Health Service's Policy on the Humane Care and Use of Laboratory Animals*. Section IV. F. 3.a. and b, states: "The IACUC, through the Institutional Official, shall promptly provide OLAW with a full explanation of the circumstances and actions taken with respect to any serious or continuing noncompliance with this Policy; any serious deviation from the provisions of the Guide".

At the November 4, 2016 meeting of the Rush IACUC, the Rush Director of Research Compliance explained the details of allegations of confirmed IACUC noncompliance by a principal investigator who was at the time an IACUC member. Currently the PI has voluntarily ceased all animal experimentation and has taken a leave of absence from IACUC membership. The allegations included the following:

1. 10 mice assigned to a departmentally funded IACUC approved project received intra-articular injections of morphine without prior IACUC approval.
2. mice assigned to an IACUC approved project funded by the Arthritis Foundation underwent a modified destabilization of the medial meniscus surgical procedure without prior IACUC approval of the modification to the procedure.
3. mice assigned to a departmentally funded IACUC approved project received injections of adenoviral vectors (AAV-Cre & AAV-GFP) without prior IACUC approval and without prior Institutional Biosafety Committee (IBC) approval.
4. mice assigned to a departmentally funded IACUC approved project underwent a surgical procedure performed by personnel without proper documentation of IACUC-required training and prior to including this individual as personnel on the approved IACUC application.
5. mice assigned to a departmentally funded IACUC approved project underwent circadian rhythm disruption without prior IACUC approval.
6. VEGFR1 tk KO mice were included/added to a departmentally funded IACUC approved

- protocol without prior IACUC approval and these mice received intra-articular injections of various VEGF ligands.
7. mice assigned to an IACUC approved project funded by the NIH and the VA received intra-articular injections of anti-NGF antibody and biotin-conjugated NGF without prior IACUC approval.
  8. VEGFR1 tk KO mice were included/added to a departmentally funded IACUC approved protocol without prior IACUC approval and these mice underwent a degenerative disc disease induction procedure.
  9. mice assigned to a departmentally funded IACUC approved project received intra-articular injections of HA-TCA and HA-Pazopanib prior to IACUC approval.
  10. mice assigned to a departmentally funded IACUC approved project underwent surgical procedures without prior IACUC approval.

The IACUC determined the findings constitute serious non-compliance such that:

- The Investigator conducted animal-related activities without appropriate IACUC review and approval
- The Investigator failed to adhere to IACUC-approved protocols
- The Investigator implemented changes to IACUC protocols without prior IACUC approval (as required by IV.B.7)
- Under the direction of the Investigator, a staff member participated in animal-related activities by individuals who have not been determined by the IACUC to be appropriately qualified and trained as required by IV.C.1.f

The chairperson of the Rush IACUC, Dr. Tom Schmid, the attending veterinarian, Dr. Jeff Oswald, and the Director of Rush Research Compliance, condary Individual, counseled the PI and requested that the following criteria be fulfilled:

1. The PI submitted a corrective action plan to the IACUC in order to ameliorate these incidents going forward. The corrective action plan included:
  - a. Voluntarily ceasing animal use activity except for breeding colony maintenance until the IACUC reviewed and approved the corrective action plan on 11/23/16.
  - b. The PI provided two additional, responsible contact persons aside from the PI for all approved animal studies.
  - c. The PI provided all lab personnel with access to final, printed copies of approved IACUC protocols and amendment requests.
  - d. The PI submitted three new IACUC applications and five IACUC amendment requests for these projects for IACUC review.
  - e. The PI resigned as an IACUC member.
2. The PI was reminded and seemed to clearly understand that the PI is responsible for assuring that prior to initiating procedures on animals, that IACUC approval has been confirmed.
3. The PI and staff were reminded and seemed to clearly understand that the PI is directly responsible to assure that all personnel listed on IACUC reviewed and approved protocols are intimately familiar with and trained to perform the procedures described in those applications.

The IACUC made a recommendation that Dr. Sampen's IACUC membership should be revoked. Accepting this recommendation, I formally communicated to Dr. Sampen on December 9, 2016 that she step down as a member of the Committee. In addition, I have suspended Dr. Sampen's privileges to perform experiments on research animals pending further inquiry into these issues. Dr. Sampen's group will continue to help provide husbandry by maintaining breeding colonies of genetically altered mice.

As a grantee of federal funds, Rush is assessing whether the aforementioned situation incurred any unallowable costs charged to the NIH grant funds during this period of non-compliance. At this preliminary report the following grants are being reviewed:

- R01 AR053220 (closed)
- R01 AR062136
- R21 AR067935
- VA BLD&R Merit Review Award 1I01BX002647

The Rush Animal Care and Use Program remains committed to the humane care and use of laboratory animals and to compliance with the regulations that govern their use in research. Please contact me, Dr. Oswald [Redacted], or Dr. Schmid [Redacted] should you have any questions regarding this incident.

Sincerely,



Joshua J. Jacobs, M.D.  
Associate Provost for Research

cc: Rush Institutional Animal Care and Use Committee  
Comparative Research Center  
[Redacted] CHRC Director, Research Compliance