



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

August 15, 2018

Re: Animal Welfare Assurance
A3230-01 [OLAW Case 40]

Ms. Pamela S. Caudill
Senior Associate Vice Provost
for Research Administration
Yale University – New Haven
25 Science Park, [REDACTED]
New Haven, CT 06520

Dear Ms. Caudill,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your August 13, 2018 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Yale University, following up on an initial June 13, 2018 email notification. According to the information provided, OLAW understands that laboratory personnel failed to replace a baffle after performing routine cleaning and maintenance which resulted in the demise of the ten zebrafish that had flowed out of the tank and into the spillway filter. The baffle was immediately replaced upon discovery of the oversight. A similar incident involving the death of five zebrafish occurred in February 2018 by the same laboratory but was not reported to this Office because it was determined to be an isolated event.

The corrective actions consisted of retraining laboratory personnel on tank maintenance, with an emphasis on ensuring replacement of the baffles following cleaning.

The establishment and application of policies and practices that are consistent with the provisions of the PHS Policy on Humane Care and Use of Laboratory Animals at Yale University are commendable and avoid the perception of a double standard. We appreciate having been informed about this matter and find no cause for further action by this Office.

Sincerely,

[REDACTED] (b) (6)

For

Neera V. Gopee, DVM, PhD, DACLAM, DABT
Animal Welfare Program Specialist
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC Chair

Yale Office of Research Administration

A3230-40

August 13, 2018

Neera Gopal, DVM, PhD, DACLAM, DABT
Office of Laboratory Animal Research
National Institutes of Health
RFL1 Suite 360, MSC 7982
6705 Rockledge Drive
Bethesda, MD 20892-7982

PAMELA S. CAUDILL
Senior Associate Provost
for Research Administration

PO Box 208327
New Haven CT 06520-8327
T 203 785-3012
F 203 785-3510
pamela.caudill@yale.edu

courier
25 Science Park, Suite 322
New Haven CT 06511

Dear Dr. Gopal:

On May 31, 2018, the Yale Animal Resource Center (YARC) identified 10 deceased zebrafish on the spillway filter. Earlier that day, the laboratory removed a baffle to aid in routine tank cleaning and maintenance, according to standard operating procedures (SOP). Unfortunately, the baffle was not replaced and, as a result, 10 zebrafish flowed out of the tank and into the spillway filter. YARC replaced the baffle to avoid additional fish from leaving the tank. This incident was self-reported to OLAW on June 13, 2018.

There had been a similar incident with the same laboratory in February 2018 when 5 zebrafish were found deceased on the spillway filter. At the time, the IACUC determined a self-report was not warranted for an isolated case. Since two similar incidents occurred within a 6-month period, Office of Animal Research Support post-approval monitoring staff coordinated a special meeting with YARC and the laboratory, so that all laboratory personnel could be retrained in the tank maintenance SOP, emphasizing the importance of making sure that the baffles are replaced when removed for cleaning.

The IACUC reviewed the details of the incident and follow-up reports at its regularly scheduled meetings on June 13, 2018.

The reporting of the incident to the sponsoring institute/center will be sent under a separate correspondence, as appropriate.

Sincerely,

(b) (6)

Pamela S. Caudill
Institutional Official
Senior Associate Provost for Research Administration

CC: Kathryn Bayne, Chief Executive Officer, AAALAC International
Elizabeth Eynon, IACUC Chair, Yale University
James Macy, Attending Veterinarian, Yale University
Troy Hallman, Director, Animal Research Support, Yale University

(b) (6)

(b) (6)

(b) (6)

(b) (6)

(b) (6)

Gopee, Neera (NIH/OD) [E]

AC3230-40

From: Gopee, Neera (NIH/OD) [E]
Sent: Wednesday, June 13, 2018 3:45 PM
To: 'Hallman, Troy'
Cc: OLAW Division of Compliance Oversight (NIH/OD); Morse, Brent (NIH/OD) [E]
Subject: RE: Self-reports

Troy,

Thank you for these 4 preliminary reports. We will start 4 new case files and look forward to receiving the final reports from the IO after the IACUC has completed its investigation. You are correct in that case 4N is next in queue to be assigned but it depends on how they are assigned during processing.

Best Regards,
Neera

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

Please note that this message and any of its attachments are intended for the named recipient(s) only and may contain confidential, protected or privileged information that should not be distributed to unauthorized individuals. If you have received this message in error, please contact the sender.

From: Hallman, Troy [mailto:troy.hallman@yale.edu]
Sent: Wednesday, June 13, 2018 3:34 PM
To: Gopee, Neera (NIH/OD) [E] <neera.gopee@nih.gov>
Subject: FW: Self-reports

Hi Neera,

I received Brent's away message, so I figured that I'd forward this to you, rather than wait for Brent's return. We just discussed these at this morning's IACUC meeting and the Committee decided to report each one.

Troy

From: "Hallman, Troy" <troy.hallman@yale.edu>
Date: Wednesday, June 13, 2018 at 3:30 PM
To: "Morse, Brent (NIH/OD) [E]" <morseb@mail.nih.gov>
Subject: Self-reports

Brent,

I'd like to take this opportunity to self-report a few unrelated issues.

- Eight 7-8 week old anesthetized mice were tail clipped for genotyping and were not provided analgesia. Because of the age of the mice (likely having full growth of the caudal vertebrae) there is a reasonable likelihood that these mice may have experienced post-procedure pain.
- Through regular maintenance in a zebrafish facility, the outflow baffle was not replaced on one tank. As a consequence, 10 fish were found dead on the spillway filter.
- A primary enclosure of mice was returned to the housing rack without replacing the food and water. As a consequence, 4 mice were found dead during routine husbandry care.
- A primary enclosure of mice was returned to the housing rack without checking the functionality of the lixit. During routine husbandry care, the lixit was found in the enclosure, unattached to the water supply. As a consequence, 2 mice were found dead.

These cases will be 4N, 4O, 4P, and 4Q, right?

Troy

Troy Hallman, MS, VMD, DACLAM
 Director, Office of Animal Research Support
 Yale University
 25 Science Park - 3rd floor
 New Haven, CT 06520
 (b) (6) (office)

OARS Suggestion Box

Morse, Brent (NIH/OD) [E]

From: Morse, Brent (NIH/OD) [E]
Sent: Tuesday, August 14, 2018 8:05 AM
To: 'Hallman, Troy'
Subject: RE: Self report

Thank you for this report Troy. We will open a case file and await further information. I'll get back to you concerning the case number.

Best regards, Brent

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

Please note that this message and any of its attachments are intended for the named recipient(s) only and may contain confidential, protected or privileged information that should not be distributed to unauthorized individuals. If you have received this message in error, please contact the sender.

From: Hallman, Troy [mailto:troy.hallman@yale.edu]
Sent: Monday, August 13, 2018 4:38 PM
To: Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>
Subject: Self report

Hi Brent,

We recently identified a cage of mice that did not have a functioning lixit. One mouse was found dead and 2 others were treated for dehydration.

Will this be 4Q? In June, I reported 4 cases to Neera (you were away) and the 4th one was 4Q, but I soon withdrew it because it actually was not associated with PHS/NSF funds.

Troy

Troy Hallman, MS, VMD, DACLAM
Director, Office of Animal Research Support
Yale University
25 Science Park - 3rd floor
New Haven, CT 06520
(b) (6) (office)

OARS Suggestion Box