



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) 480-3387

June 30, 2020

Re: Animal Welfare Assurance  
A3196-01 [OLAW Case 6I]

Dr. Roger M. Wakimoto  
Vice Chancellor for Research  
University of California, Los Angeles  
(b) (4) Murphy Hall - 104501  
Los Angeles, CA 90024-1405

Dear Dr. Wakimoto,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your June 12, 2020 letter reporting programmatic adverse events that occurred at the University of California - Los Angeles. A preliminary report was provided via phone call to this office on April 8, 2020. According to the information provided, OLAW understands that on March 11, 2020, the ARC Chair was informed of incidents occurring in a specific vivarium on campus in January and February 2020 where evidence was found of euthanized rats, and possibly mice, having been placed in a carcass freezer without the required secondary physical method of euthanasia being performed, resulting in the animals regaining consciousness. It was subsequently considered that the DLAM employee most likely responsible for these incidents had left the university in March 2020, but this could not be unequivocally verified. It was not determined if the animals were assigned to a PHS-funded project.

For corrective and preventive measures, it was assured that current DLAM personnel serving the area in question were using confirmatory methods, and that a plan for regular refresher training of DLAM personnel on confirmatory methods of euthanasia in rodents was being put in place. A communication was also sent to the faculty researchers working with rodents in the building where the incidents occurred, reminding them of their responsibility to ensure that their personnel are cognizant of the need for, and trained in the performance of, confirmatory methods of euthanasia, and requiring acknowledgment of the communication.

Based on the information provided, OLAW is satisfied that appropriate actions have been taken by the University of California - Los Angeles to investigate these incidents, correct the noncompliance, and prevent recurrence. OLAW concurs that this programmatic issue warranted reporting. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

**Brent C. Morse -S**

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

Digitally signed by Brent C.  
Morse -S  
Date: 2020.06.30 16:06:10 -04'00'

cc: IACUC contact

June 12, 2020

Brent Morse, DVM  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
Rockledge 1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, MD 20892-7982

RE: Final Report of an Incident of Noncompliance  
Animal Welfare Assurance **A3196-01**

Dear Dr. Morse:

I am writing to provide you with a final report of noncompliance that involved non-USDA covered species (rats, mice) and was initially called in on April 8, 2020. Although the funding source tied to this noncompliance is unknown, the ARC viewed this as a programmatic issue; as such, a report is provided in order to be fully transparent.

On March 11, 2020, the ARC Chair was informed of incidents occurring in a specific vivarium on campus in January and February 2020 where evidence was found of euthanized rats, and possibly mice, having been placed in a carcass freezer without the required secondary physical method of euthanasia being performed, resulting in the animals regaining consciousness. At the next ARC meeting, the Chair informed the Committee of the report and that an investigation would be launched. The Committee discussed the matter again on April 6, 2020 and May 18, 2020.

The ARC investigation into this report began with a meeting of the ARC Chair, the individual who contacted the Chair, the DLAM Executive Director and Attending Veterinarian, and the DLAM Assistant Director of Technical Operations to discuss efforts to identify the individual(s) responsible. It was considered that a junior member of DLAM personnel who left the university in March 2020 was most likely responsible for the incidents, but this could not be unequivocally verified. The ARC received assurance that current DLAM personnel serving the area in question were indeed using confirmatory methods, and that a plan for regular refresher training of DLAM personnel on confirmatory methods of euthanasia in rodents was being put in place. A communication was also sent to the faculty researchers working with rodents in the building where the incidents occurred, reminding them of their responsibility to ensure that their personnel are cognizant of the need for, and trained in the performance of,

confirmatory methods of euthanasia, and requiring acknowledgment of the communication.

As of the date of this letter, no further incidents have been reported. Based on the investigation and subsequent actions, the ARC is satisfied that the matter has been fully addressed and may be considered closed.

At UCLA, the ARC is responsible for overseeing an animal program involving approximately 950 protocols for over 400 different PIs. Despite the complex nature of this program, we are proud to report that incidents of noncompliance are infrequent. When such incidents do transpire, they are investigated promptly and corrective actions are implemented, including education and retraining as appropriate.

If you have any questions or concerns, please contact the RSAWA Director at (b) (6)  
(b) (6)

Sincerely,

(b) (6)

Roger M. Wakimoto  
Vice Chancellor for Research

cc: AAALAC  
ARC Chair  
Associate Vice Chancellor for Research  
Director – Research Safety & Animal Welfare Administration  
DLAM Executive Director and Attending Veterinarian

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Monday, June 15, 2020 7:23 AM  
**To:** Perkins, Jennifer  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Final Report of an Incident of Noncompliance, AWA A3196-01

Thank you for this report, Ms. Perkins. We will respond soon.

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

**From:** Perkins, Jennifer <JPerkins@research.ucla.edu>  
**Sent:** Friday, June 12, 2020 1:55 PM  
**To:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>; OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** accredit@aaalac.org; [REDACTED] (b) (6)  
[REDACTED] (b) (6)  
[REDACTED] (b) (6)  
**Subject:** Final Report of an Incident of Noncompliance, AWA A3196-01

Dear Dr. Morse,

Please see the attached final report of an incident of noncompliance. Please feel free to contact me if you have any questions.

Regards,  
Jennifer

**Jennifer Perkins, MA, CPIA**  
Director – Research Safety & Animal Welfare Administration (RSAWA)  
Institutional Contact for Dual Use Research (ICDUR)

[REDACTED] (b) (6)



### Initial Report of Noncompliance

By: Brent

Date: 4/8/2020

Time: Voicemail

Name of Person reporting: Jennifer Perkins

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: UCLA

Assurance number: A3196

Did incident involve PHS funded activity? \_\_\_?\_\_\_

Funding component: \_\_\_\_\_

Was funding component contacted (if necessary): \_\_\_\_\_

What happened? "Handful" of mice and rats found alive in carcass freezer due to incomplete euthanasia. Potentially a programmatic issue.

Species involved: Mice and Rats

Personnel involved: unsure

Dates and times: January and February 2020

Animal deaths:

Projected plan and schedule for correction/prevention (if known): \_\_\_\_\_

Currently investigating

Projected submission to OLAW of final report from Institutional Official:

Within a few weeks

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Case # \_\_\_\_\_



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September 29, 2020

Re: Animal Welfare Assurance  
A3196-01 [OLAW Case 6J]

Dr. Roger M. Wakimoto  
Vice Chancellor for Research  
University of California, Los Angeles  
(b) (4) Murphy Hall - 104501  
Los Angeles, CA 90024-1405

Dear Dr. Wakimoto,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your September 22, 2020 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of California - Los Angeles. A preliminary report was provided via phone call to this office on September 21, 2020. According to the information provided, OLAW understands that two incidents occurred in which a live rat was found in the carcass freezer for a specific vivarium. The small group of PIs approved to use rats in that building were informed of the need to review proper rat euthanasia techniques with all staff who perform the procedure. It was subsequently determined that one lab was responsible for the first event and was also most likely responsible for the second event. The animals were assigned to a PHS-funded project.

The identified PI counseled his staff about the serious nature of this matter and reviewed euthanasia methods. The PI further assured the Committee that staff are now double-checking the euthanasia of every rat and including at least two lethal and approved euthanasia procedures in every instance.

Due to a recent, similar incident and considering the unacceptable nature of failed euthanasia, your committee voted to require a physical method be used to confirm death in rats when a non-physical (e.g., chemical) method is the primary means of euthanasia

Based on the information provided, OLAW is satisfied that appropriate actions have been taken by the University of California - Los Angeles to investigate these incidents, correct the noncompliance, and prevent recurrence. OLAW concurs that this issue warranted reporting. We commend the IACUC for taking additional measures to prevent such animal welfare incidents. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

**Brent C. Morse -S**

Digitally signed by Brent C.  
Morse -S  
Date: 2020.09.29 09:43:41 -04'00'

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

cc: IACUC contact



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

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**From:** Morse, Brent (NIH/OD) [E]  
**Sent:** Tuesday, September 22, 2020 12:02 PM  
**To:** Jennifer Klahn; OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** [REDACTED] (b) (6)  
**Subject:** RE: Report of Noncompliance, AWA A3196-01

Thank you for this final report Ms. Klahn. I received your preliminary voicemail report yesterday. We will send an official response soon.

Best regards, Brent Morse

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

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**From:** Jennifer Klahn <jennifer.klahn@research.ucla.edu>  
**Sent:** Tuesday, September 22, 2020 11:43 AM  
**To:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>; OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** accredit@aaalac.org; [REDACTED] (b) (6)  
[REDACTED] (b) (6)  
[REDACTED] (b) (6)  
**Subject:** Report of Noncompliance, AWA A3196-01

Dear Dr. Morse,

As a follow-up to my voicemail yesterday, please see the attached report from our IO regarding an incident of noncompliance involving rats. Please contact me if you have any questions.

Regards,  
Jennifer

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**Jennifer Klahn, MA, CPIA**  
Director – Research Safety & Animal Welfare Administration (RSAWA)  
Institutional Contact for Dual Use Research (ICDUR)  
[REDACTED] (b) (6)

**UCLA Research & Creative Activities**

Roger M. Wakimoto, Ph.D.  
2248 Murphy Hall  
Mail code 140501  
Phone: (310) 825-7943  
Email:  
[rwakimoto@conet.ucla.edu](mailto:rwakimoto@conet.ucla.edu)

September 22, 2020

Brent Morse, DVM  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
Rockledge 1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, MD 20892-7982

RE: Final Report of an Incident of Noncompliance  
Animal Welfare Assurance A3196-01

Dear Dr. Morse:

I am writing to provide you with a final report of noncompliance that involved non-USDA covered species (rats) and was called in on September 21, 2020. The award number associated with this noncompliance is OD026560.

At a convened meeting on August 24, 2020, the ARC was informed of two incidents in which live rats were found in the carcass freezer for a specific vivarium. The Committee was informed that the veterinary staff within DLAM launched an investigation and communicated with the small group of PIs approved to use rats in that building; their communication emphasized the need to review proper rat euthanasia techniques with all staff who perform the procedure.

Using information from the DLAM investigation, the ARC subsequently communicated with two PIs, confirming that one lab was responsible for the first event and, through process of elimination, was also most likely responsible for the second event. The identified PI reported having extensive discussions with his staff about the serious nature of this matter and reviewing euthanasia methods to avoid future errors. The PI further assured the Committee that staff are now double-checking the euthanasia of every rat and including at least two lethal and approved euthanasia procedures in every instance. The ARC accepted this response and considers the matter closed.

With this recent incident following the case reported in June 2020 (OLAW Case 6I), and considering the unacceptable nature of failed euthanasia, the ARC voted on September 14, 2020 to require a physical method be used to confirm death in rats when a non-physical (e.g., chemical) method is the primary means of euthanasia. This requirement is being developed into Policy and will be distributed to the campus research community by the end of the month.



At UCLA, the ARC is responsible for overseeing an animal program involving approximately 950 protocols for over 400 different PIs. Despite the complex nature of this program, we are proud to report that incidents of noncompliance are infrequent. When such incidents do transpire, they are investigated promptly and corrective actions are implemented, including education and retraining as appropriate.

If you have any questions or concerns, please contact the RSAWA Director at (b) (6)  
(b) (6)

Sincerely,

(b) (6)

Roger M. Wakimoto  
Vice Chancellor for Research

cc: AAALAC  
ARC Chair  
Associate Vice Chancellor for Research  
Director – Research Safety & Animal Welfare Administration  
DLAM Executive Director and Attending Veterinarian



## Initial Report of Noncompliance

By: BCM

Date: 9/21/2020

Time: 11:45

Name of Person reporting: Jennifer Klahn

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: UCLA

Assurance number: A3196

Did incident involve PHS funded activity? yes

Funding component: \_\_\_\_\_

Was funding component contacted (if necessary): \_\_\_\_\_

What happened?

Failure to properly conduct CO2 euthanasia of rats. One rat each of two incidences.

Species involved: Rat

Personnel involved:

Dates and times:

Animal deaths:

Projected plan and schedule for correction/prevention (if known): \_\_\_\_\_

Counseling of individual and re-training on CO2 euthanasia procedures.

Projected submission to OLAW of final report from Institutional Official:

Less than 30 days

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Case # \_\_\_\_\_