



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

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May 22, 2017

Re: Animal Welfare Assurance
#A3187-01 [OLAW Case 6G]

Mr. George A. Huber
Vice Provost for Research Conduct
and Compliance
University of Pittsburgh
132 Cathedral of Learning
4200 Fifth Ave.
Pittsburgh, PA 15260

Dear Dr. Jenkins,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your May 9, 2017 letter responding to my March 14, 2017 request for an assessment of allegations of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals made by People for the Ethical Treatment of Animals about Children's Hospital of Pittsburgh, University of Pittsburgh. Photographs and videos had been taken by an undercover informant who worked at the institution. According to the information provided, OLAW understands that the allegations and accompanying videos and pictures were reviewed by the Attending Veterinarian, Compliance Officer, and Institutional Animal Care and Use Committee (IACUC) chair and pertinent records were examined and staff interviewed. The institution provided a specific response to each allegation and examples of the variety of responses to the allegations that were developed are as follows:

- It is not unusual to find dead research mice in a large animal care and use program. Upon discovery they are handled according to institutional policies. Multiple deaths on a protocol that exceed expected mortalities are investigated by the veterinarian and reported to the IACUC.
- Various reports of ill animals involving mice, rabbits, and nonhuman primates were determined to have been promptly and appropriately addressed by the veterinary staff in a manner consistent with standard veterinary care and procedures.
- Some allegations could not be corroborated or evaluated based on the provided animal records for specific dates. In other situations, noncompliance was not confirmed.
- Some animal deaths and phenotypic abnormalities were expected under the approved protocol.
- Some wet or flooded cages were identified containing living and/or dead mice. Surviving mice were appropriately transferred to a clean, dry cage and given supplemental heat as necessary.

- In a few situations, the adverse activity occurred due to direct action/inaction of the informant. Some allegations were made by the informant but could not be corroborated because they were not reported or documented elsewhere.
- The Attending Veterinarian and all clinical veterinarians have access to all animals and authority to provide veterinary care in accordance with PHS Policy.
- Some findings, such as live mice found in a plastic bag, had been reported to the IACUC and then to OLAW and corrective actions had been implemented.
- Specific problems such as an individual not using a biohazard door sign or weaning mice into a cage with unfamiliar adults resulted in reprimands and/or retraining of the individuals responsible. Employee performance problems are handled by the human resources department.
- Social housing of social species is the norm and animals are only single housed if scientifically justified and approved by the IACUC, if incompatible, or due to veterinary medical reasons. One squirrel monkey was temporarily singly housed because conspecifics had been used during research. New squirrel monkeys were obtained and released from quarantine into the housing area. The institution has a social housing policy which addresses extra enrichment for single housed animals. Single animals are evaluated for pair housing consistent with institutional policies and animal behavior technicians evaluate compatibility.
- Group housed mice may become involved in fights with a dominant cage mate. In such situations, incompatible animals are separated, examined, treated, or euthanized.

Based on its assessment of these explanations, OLAW understands that some allegations could not be substantiated while other issues did occur but were appropriately addressed. OLAW concurs with these actions but notes that 1) rodents being transferred for euthanasia are not to be held at a higher density than those under routine housing conditions, 2) the CO2 displacement rate for rodent euthanasia must be consistent with the current AVMA Guidelines for the Euthanasia of Animals unless a specific study provides scientific justification and has IACUC review and approval for using a different rate; this is not to be extended to all rodent euthanasia conducted at the institution, 3) OLAW expects veterinary directives to be followed. OLAW finds the institutional responses to the identified problems to be appropriate and in compliance with the provisions of the PHS Policy. We will inform PETA about this determination and hereby close this investigation. Thank you for your prompt and thorough response to this inquiry.

Sincerely,



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

cc: IACUC Contact
Elizabeth Goldentyer, D.V.M., Eastern Regional Director, USDA-APHIS-AC