

The Regents of the University of Michigan 500 S. State Street Ann Arbor, MI 48109 Via email: umregents@umich.edu

Dr. Mark Schlissel, President University of Michigan 500 S. State Street Ann Arbor, MI 48109 Via email: presoff@umich.edu 3/20/19

Regents, President Schlissel,

I am writing to you today to file an official request for an independent investigation of several recent incidents of negligence which collectively resulted in the deaths of 11,610 animals and the disappearance of another. These incidents of negligence indicate serious systemic issues within the University of Michigan animal experimentation system.

The troubling incidents of negligence are summarized in UM correspondence. The first incident was summarized in correspondence dated 9/24/18. This correspondence states that: "When the RO system pump restarted, bleach was inadvertently siphoned into the zebrafish tank reservoir. As a result, fish started to die... about 40% of the fish (11,548) were lost..."

In other words, UM staff negligence poisoned over 11,500 fish with bleach. This immersion in bleach water was surely highly painful for these animals.

Additional UM correspondence dated 6/13/18 states: "...a single rack of mouse cages was accidentally dislodged from the room water supply. As a result, the cohort of cages on the top of the rack received insufficient water to sustain the mice. Approximately 53 mice were affected by the oversight."

Calling this an "oversight" is a significant misnomer. Failure to insure that animals have adequate water is clear negligence. This is not an issue where someone forgot to check a box on a report. Not only was the caging not properly reconnected to the watering system. No one even noticed that there was a problem until animals began to die. How many days did these animals go without water?

Additional UM correspondence dated 5/7/18 states: "... on April 2, 2018, an animal caretaker noted that a transgenic rabbit was missing from the vivarium, and that there was an absence of record identifying its location."

In other words, UM staff not only lost an animal, but also lost his/her record. Does your staff lose animals often? How many more have disappeared? Did any of them have communicable diseases?

Lastly, UM correspondence dated 3/18/18 states: "... a gastrointestinal cancer study that involved the development of internal tumors included defined experimental points at which time the PI was expected to remove animals from the study. The PI notified the IACUC that due to changes in the proximity of his laboratory space as it relates to his animal housing room inhibited his ability to adequately monitor the animals to ensure they were removed from the study when experimental endpoints were achieved. Consequently, university veterinary staff immediately reviewed the health status of each of his animals, and discovered nine animals experiencing clinical conditions that suggested health impacts associated with the development of gastrointestinal tumors. These animals were humanely euthanized by veterinary staff."

In other words, since the mice were no longer conveniently close to the PI, he couldn't be bothered to check on them to insure they were not suffering and perform euthanasia. This is the height of callousness and negligence.

To summarize, in approximately six months carelessness and negligence by University of Michigan laboratory staff fatally poisoned over 11,000 fish with bleach, fatally deprived over 50 mice of water, lost a rabbit, and failed to provide timely euthanasia to 9 mice because they were no longer conveniently close to the PI's office.

This is a description of multiple incidents of clear and unadulterated negligence that must be punished. The staff involved in these incidents should never be allowed to work with animals again. Therefore, I am calling upon the administration of the University of Michigan to launch an independent investigation into these incidents and take serious punitive actions against the responsible staff.

I look forward to hearing from you in the near future.

Sincerely,

Michael A. Budkie, A.H.T.,

Executive Director, SAEN

A3114-4F



September 24, 2018

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

Dear Dr. Wolff:

The University of Michigan (U-M), in accordance with Assurance A3114-01 and the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy) provides this report of an adverse event occurring at the U-M. The IACUC considered this matter in July of 2018.

Specifically, water from a Reverse Osmosis (RO) tank was being used to fill an 80-gallon bleach sanitation tank. During the process, the tubing from the RO tank became immersed in the bleach reservoir. When the RO system pump restarted, bleach was inadvertently siphoned into the zebrafish tank reservoir. As a result, fish started to die.

The problem was instantly identified, and the principal investigators and veterinary staff were immediately on site to rectify the issue. The source of the contamination was isolated, and as many fish as possible were moved to unaffected systems. In total, about 40% of the fish (11,548) were lost with all critical transgenic strains being preserved. The standard operating procedure (SOP) for preparing the sanitation tanks was revised, and the U-M believes the changes will eliminate the potential for reoccurrences.

Sincerely,

(b) (6)

S. Jack Hu, IO and Vice President for Research

(b) (6)

William Greer, Assistant Vice President for Research and Director of the Animal Care and Use Office

cc: IACUC

412 Victor Vaughan, 1111 Catherine Street Ann Arbor, MI 48109-2054 T: 734-763-8028 T: 734-936-3234 acuoffice@mnich.edu



June 13, 2018

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

Dear Dr. Wolff:

The University of Michigan (U-M), in accordance with Assurance A3114-01 and the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy), provides this report of an adverse event occurring at the U-M. This matter was discussed by the IACUC on Monday, May 7, 2018.

In late April of 2018, husbandry staff were moving cage racks in an animal room to perform routine sanitation procedures. During this process, a single rack of mouse cages was accidentally dislodged from the room water supply. As a result, the cohort of cages on the top of the rack received insufficient water to sustain the mice. Approximately 53 mice were affected by the oversight.

The IACUC reviewed the standard practices used by husbandry staff to ensure automatic watering systems are always functioning. During discussion, the committee learned that the rack in question was inadvertently missed during the routine preventative maintenance check.

To avoid future reoccurrences, the husbandry manager and the Attending Veterinarian (AV) proactively provided intense retraining to all husbandry staff. The retraining included, for example, a thorough re-review of the appropriate standard operating procedure, and a continued emphasis on the importance of technicians ensuring daily that the automatic watering systems are functioning appropriately.

The IACUC concurred that the measures taken by the AV appropriately mitigate the risk of recurrence.

Sincerely,

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S. Jack Hu, IO and Vice President for Research

(b) (6)

William Greer, Assistant Vice President for Research and Director of the Animal Care and Use Office

Cc: IACUC



Initial Report of Noncompliance

By: an

Date: 5/16/18	Time: 9:30
Name of Person reporting: Bell Green Telephone #: Fax #: Email:	
Name of Institution: Assurance number: A3114	
Did incident involve PHS funded activity? Funding component: Was funding component contacted (if necessary):	
What happened? 50 min died or entransed due to me water, rack met hooked up right, breach check didn't citel problem	
Species involved: Al Ce Personnel involved: Caretalary Dates and times: Animal deaths:	
Projected plan and schedule for corréction/prevention (if known):	
Retrain	
Projected submission to OLAW of final report from Institutional Official:	
OFFICE USE ONLY Case #	

A3/14-40



Date: May 7, 2018

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

Dear Dr. Wolff:

The University of Michigan (U-M), in accordance with Assurance A3114-01 and the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy) provides this report of an adverse event occurring at the U-M. This matter was discussed by the IACUC on Monday, May 7, 2018.

While conducting the daily animal health checks on April 2, 2018, an animal caretaker noted that a transgenic rabbit was missing from the vivarium, and that there was an absence of record identifying its location. Senior members of the animal care and use program conducted a thorough investigation after confirming that the principal investigator did not utilize the rabbit.

The investigation was initiated through detailed discussions with husbandry supervisors and animal care technicians. The veterinary unit conducted a systematic search of the animal housing and support areas with the animal not being located in, for example, a different animal housing room, the cage wash area, or the room plumbing/ventilation systems. In addition, we reviewed the animal room entry logs, and to the best of our ability, we were unable to identify any unauthorized entry by individuals into the animal room. The investigation is complete, and the location of the animal is unknown.

Sincerely,

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S. Jack Hu, IO and Vice President for

Research

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William Greer, Assistant Vice President for Research and Director of the Animal Care and Use Office

cc:

(b) (6)

Date: March 18, 2018

Axel Wolff, MS, DVM
Deputy Director
Office of Laboratory Animal Welfare (OLAW)
National Institutes of Health
RKL 1, Suite 360, MSC 7982
6705 Rockledge Drive
Bethesda, MD 20892-7982

Dear Dr. Wolff:

The University of Michigan (U-M), in accordance with Assurance D16-00072 (A3114-01) and the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy) IV.F.3. provides this report regarding the involvement of nine mice in activities that were not consistent with the approved protocol. The incident was discussed by the IACUC on several occasions, but most recently on Monday, February 5, 2018.

Specifically; a gastrointestinal cancer study that involved the development of internal tumors included defined experimental end points at which time the PI was expected to remove animals from the study. The PI notified the IACUC that due to changes in the proximity of his laboratory space as it relates to his animal housing room inhibited his ability to adequately monitor the animals to ensure they were removed from the study when experimental endpoints were achieved. Consequently, university veterinary staff immediately reviewed the health status of each of his animals, and discovered nine animals experiencing clinical conditions that suggested health impacts associated with the development of gastrointestinal tumors. These animals were humanely euthanized by veterinary staff.

As a result, the IACUC asked that veterinary staff retain oversight of the remaining animals under the university maintenance protocol until the logistics associated with the relocation of his laboratory was resolved. The IACUC approved maintenance protocol authorizes husbandry and veterinary staff to appropriately care for any university owned animals, which includes providing ad libitum food and water and veterinary care. This action resolved the concerns and no corrective actions were imposed by the IACUC.

The research is supported through NIH Grant #UH2AI128900. NIH funds were not used to support any activities that were not previously approved by the IACUC. Accordingly, the NIH funding component was not notified of the situation.

INSTITUTIONAL ANIMAL CARE & USE COMMITTEE

The University of Michigan is committed to protecting the welfare of animals used in research and appreciates the guidance and assistance provided by OLAW in this regard. Should you have any questions regarding this report, please contact William G. Greer.

Sincerely,

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S. Jack Hu, IO and Vice President for Research

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William Greer, Assistant Vice President for Research, Animal Care and Use

D. Myers, IACUC Chair W. King, Attending Veterinarian

cc: