



MAY 16 2006

Animal Care

USDA, APHIS, Animal Care

ANIMAL WELFARE COMPLAINT

Complaint No. 06-156	Date Entered 18-Apr-2066	Received By R. Mitchell
Referred To Hovanscak/Barksdale	Reply Due 18-May-06	

Facility or Person Complaint Filed Against

Name Medical College of Wisconsin		Customer/License/Registration No. 35R0029	
Address 8701 WATERTOWN PLANK ROAD			
City Milwaukee	State Wi	Zip 53226	Phone No (414) 456-8259

Complainant

Name John J. Pippin M.D.		Organization PCRM	
Address 5100 Wisconsin N.W. Suite 400			
City Washington	State DC	Zip 20016	Phone No./Email address (205) 686-2210
How was complaint received? Mail			

Details of Complaint: See Attached

Results: An inspection was conducted to investigate the allegations named in the complaint. The attached report outlines the findings of the inspection.

Application packet provided? Yes  No

INSPECTOR Dawn Barksdale, VMO/APHIS/WI	DATE 5/11/06
REVIEWED BY	DATE



MAY 16 2006

DBARKSDALE

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226406 insp\_id  
7222 site\_id

**INSPECTION REPORT**

**MEDICAL COLLEGE OF  
WISCONSIN  
OSCAR F PETERSON ANIMAL  
RESEARCH CTR**

**Customer ID: 634  
Certificate: 35-R-0029  
Site: 001  
OSCAR F. PETERSON ANI RES**

**8701 WATERTOWN PLANK ROAD  
P.O. BOX 26509  
MILWAUKEE, WI 53226**

**Inspection  
Type: ROUTINE INSPECTION  
Date: MAY-11-2006**

- 2.31 ( d X 1 X ii )
- 2.31 ( d X 5 )
- 2.31 ( e X 3 )
- 2.31 ( e X 5 )

**INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE (IACUC).**

(1) In order to approve proposed activities or proposed significant changes in ongoing activities, the IACUC shall conduct a review of those components of the activities related to the care and use of animals and determine that the proposed activities are in accordance with this subchapter unless acceptable justification for a departure is presented in writing;... Further, the IACUC shall determine that the proposed activities or significant changes in ongoing activities meet the following requirements:.....

.....(ii) The principal investigator has considered alternatives to procedures that may cause more than momentary or slight pain or distress to the animals, and has provided a written narrative description of the methods and sources, e. g., the Animal Welfare Information Center, used to determine that alternatives were not available;.....

\*\*The regulations require principal investigators to consider alternatives to procedures that may cause more than momentary or slight pain or distress to the animals and to provide a written narrative of the methods used and sources consulted to determine the availability of alternatives, including refinements, reductions and replacements. The written narrative must include adequate information for the IACUC to assess that a reasonable and good faith effort was made to determine the availability of alternatives or alternative methods.

Protocol 038-95-1 describes an alternative search but does not list that any alternatives were found. A search conducted by the inspectors showed that alternatives exist. If alternative methods are available, the written narrative must justify why the alternatives were not used. There is not enough information for the IACUC to determine that a reasonable and good faith effort was made to identify alternatives, refinements, reductions and replacements.

Correct by July 1, 2006

(5) The IACUC shall conduct continuing reviews of activities covered by this subchapter at appropriate intervals as determined by the IACUC, but not less than annually;.....

Prepared By:

*Dawn Barksdale, DVM*

DAWN BARKSDALE, D V M , USDA, APHIS, Animal Care

Title:

(b)(6), (b)(7)c

ID: 1062

Date:

MAY-11-2006

Received By:

Title:

Date:

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**INSPECTION REPORT**

\*\*Protocol 038-95-1 requests use of 60 dogs per year (180 dogs for 3 years). The IACUC has approved 360 dogs for a 3 year period. The protocol also requests the use of 8 rabbits per year (24 rabbits for 3 years). The IACUC approved 96 rabbits for a 3 year period. There is a miscommunication and the IACUC must review the number of animals required and approved.

Correct by July 1, 2006

(e) A proposal to conduct an activity involving animals, or to make a significant change in an ongoing activity involving animals, must contain the following:

(3) A complete description of the proposed use of the animals;.....

\*\*In Protocol #038-95-1 there is not an accurate or complete description of animal use. The protocol states that there will be one instructor per animal. Eighteen animals are used concurrently during one laboratory period, but only six personnel are listed on the protocol. The protocol also involves a long period of anesthesia but does not address who is responsible for the anesthetic monitoring or what signs are being monitored. The method of euthanasia is not well described. The protocol states "heart will be fibrillated and ventilation terminated in open chest dog." This description is vague and may not be understood by all IACUC members. It is not an AVMA approved euthanasia method (as written in the protocol) and therefore requires more explanation. There is no description of animal fasting requirements prior to the lab, however, the inspectors were told that the animals are fasted the night before the lab. The protocol needs to be written in a manner that all IACUC members know exactly what is happening with the animals.

Correct by July 1, 2006

(e) A proposal to conduct an activity involving animals, or to make a significant change in an ongoing activity involving animals, must contain the following:

(5) A description of any euthanasia method to be used.....

\*\*Protocol 038-95-1 describes the use of carbon dioxide for the euthanasia of rabbits. However, the institutional program of veterinary care does not list carbon dioxide as a method of euthanasia for this species. If use of carbon dioxide is an exemption it should be clarified in the protocol and approved by the IACUC or it should be added as a possible method of euthanasia in the program of veterinary care. The program of veterinary care also states that acceptable methods of dog euthanasia include sodium pentobarbital or KCl under anesthesia. This protocol states dogs will be euthanized by "heart will be fibrillated and ventilation terminated in open chest dog." This needs to be further clarified in the protocol or approved by the IACUC as an exemption.

Correct by July 1, 2006

2.32 ( a )

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*Dawn Barksdale, DVM*

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**INSPECTION REPORT**

**PERSONNEL QUALIFICATIONS.**

(a) It shall be the responsibility of the research facility to ensure that all scientists, research technicians, animal technicians, and other personnel involved in animal care, treatment, and use are qualified to perform their duties. This responsibility shall be fulfilled in part through the provision of training and instruction to those personnel.

(b) Training and instruction shall be made available, and the qualifications of personnel reviewed, with sufficient frequency to fulfill the research facility's responsibilities under this section and Sec. 2.31.....

\*\*For Protocol 038-95-1 it is unclear what training the personnel have received, or if they are qualified for the animal use described. It is the responsibility of the institution to provide appropriate training and for the IACUC to review the qualifications of all personnel involved in the protocol.

Correct by July 1, 2006

**2.33 ( b )**

**ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE.**

(b) Each research facility shall establish and maintain programs of adequate veterinary care that include:.....

\*\*The institution has a written program of veterinary care. This program describes the conditioning dogs over a period of 21 days and rabbits for 72 hours. However, the animals used in Protocol 038-95-1 have varying numbers of acclimation days, but generally not longer than 7 days. The program of veterinary needs to address the care of animals such as these that are to be used in acute procedures.

Correct by September 1, 2006

*038-95-1*

Prepared By:

*Dawn Barksdale DVM*  
DAWN BARKSDALE, D V M , USDA, APHIS, Animal Care

Title:

VETERINARY MEDICAL OFFICER, Inspector ID: 1062

Received By:

(b)(6), (b)(7)c  
[Redacted]

Title:

Date:

MAY-11-2006

Date:

MAY-11-2006