



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare  
Rockledge One, Suite 360  
6705 Rockledge Drive - MSC 7982  
Bethesda, Maryland 20892-7982  
Home Page: <http://grants.nih.gov/grants/olaw/olaw.htm>

FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare  
Rockledge One, Suite 360  
6705 Rockledge Drive  
Bethesda, Maryland 20817  
Telephone: (301) 496-7163  
Facsimile: (301) 402-2803

DATE: December 3, 2008

TO: Suzanne Servis  
Director, Office of Management Assessment, OM, OD

FROM: Director, Division of Compliance Oversight, OLAW

SUBJECT: Concerns Regarding Tracking of Grant Funds at the University of Wisconsin-Madison

The Office of Laboratory Animal Welfare (OLAW) had received a self report concerning noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of Wisconsin-Madison. The problems involving the animals were successfully resolved, however the University appeared to imply that there were no specific mechanisms in place to accurately track grant funds regarding protocols involving animals. OLAW had specifically asked what measures had been taken to ensure that a PHS-supported grant was not charged for procedures which had not been approved by the Institutional Animal Care and Use Committee (IACUC) and thus did not meet the terms and conditions of the NIH Grants Policy Statement. The Institutional Official indicated that in these situations a new policy had been developed which would cover the costs of animal activities conducted in the absence of valid IACUC approval of the activity.

OLAW expressed concern with this new institutional policy in that it may encourage individuals to conduct animal activities without approval because there is no financial disincentive, this action gives the impression that noncompliance is condoned by the University and will be financially supported, and that many journals require certification that the animal activities were conducted in compliance with relevant regulations including approval by an IACUC and animal data gathered under noncompliant conditions may preclude publication even if the costs were covered. This new policy also did not address the original question as to which measures have been implemented to prevent charging of an unapproved animal activity to the relevant PHS grant.

Although OLAW has closed the case based on the University's appropriate response to the animal concern, the financial aspects involving accurate tracking of grant funds may need to be further explored by your Office. The Director of the Division of Grants Compliance and Oversight, Office of Policy for Extramural Research Administration has also been copied regarding this issue.

Thank you for your attention to this matter.

Axel Wolff, M.S., D.V.M.

