



Stop Animal Exploitation NOW!

Dr. Jay Gogue, Interim President,
Auburn University
Auburn, Alabama 36849
Via email: boles@auburn.edu

10/14/19

Interim President Gogue,

I am writing to you today to ask that you take administrative action to permanently revoke animal use privileges for multiple individuals connected to an animal experiment which Auburn University Administration has suspended, as well as launching an independent investigation of all related projects, etc. This situation is of the utmost importance because it impacts not only the project which was suspended but may potentially impact multiple other research projects, as well as the integrity of the entire Auburn University research program.

Auburn University correspondence dated 7/15/19 states:

"This is a report of non-compliance and revocation of animal care and use privileges of a Principal Investigator (PI), a Co-Investigator (Co-I), and two graduate students at Auburn University. . . . On May 9, 2019 the Director of Laboratory Animal Health send an email to the PI and Co-I informing them that medical records indicated that hazardous drugs had been given to their animals without IACUC approval and in a location not approved for safe handling of hazardous drugs. The email requested clarification of the situation. The Co-I responded that although the administration of hazardous drugs had been planned, they had not been given to live animals and instead were injected post mortem. The next day, the hazardous drug entry in the medical record was found to have been blacked out. However, further documentation of hazardous drug administration was found on associated cage cards. The Director called the IACUC Chair to report the incident and request an investigation. . . .

The Co-I acknowledged that the hazardous drugs were not on the approved protocol and that due to miscommunication between the Co-I and the students, the drugs were given to the animals while they were alive rather than post-euthanasia. As the Co-I took responsibility for the error, the investigation was not pursued further.

On June 6, 2019, the incident was presented to the IACUC for discussion. The discussion resulted in the IACUC requesting that interviews of the two graduate students be conducted by the director and IACUC chair. Interviews of the two students indicated that the number of animal protocols they worked on was very high, so effective communication among laboratory members appeared inadequate.

One student had not read the animal protocol. The other student had read the protocol but despite this knowledge had proceeded to administer the hazardous drugs. Neither student routinely read the protocols on which they worked. Moreover, there was an apparent lack of concern that they had conducted activities without IACUC approval and had put animal care workers at risk by using unauthorized hazardous agents in an animal care room not approved for safe handling of such drugs.

Decisions by the IACUC:

Suspend the PI, Co-I, and 2 graduate students from conducting any animal activities at Auburn University for a period not less than six months.

Require successful retraining . . . "

There are so many different aspects of this situation which are so very disturbing that it is difficult to say where to begin this discussion. The first point which must be made is that according to the report "Interviews of the two students indicated that the number of animal protocols they worked on was very high . . . One student had not read the animal protocol. The other student had read the protocol but despite this knowledge had proceeded to administer the hazardous drugs. Neither student routinely read the protocols on which they worked. Moreover, there was an apparent lack of concern that they had conducted activities without IACUC approval and had put animal care workers at risk by using unauthorized hazardous agents in an animal care room not approved for safe handling of such drugs."

The actions of these two students not only potentially endangered Auburn University staff, it may have impacted a "**number of animal protocols.**" These other protocols must also be investigated for errors and other potential risks to both human and animal safety because "**Neither student routinely read the protocols on which they worked.**" If they don't read the protocols, how do they know what they are supposed to do, how the animals are supposed to be handled, what data is being collected, etc? It is also deeply disturbing that " . . . **there was an apparent lack of concern that they had conducted activities without IACUC approval and had put animal care workers at risk.**"

The careless attitude exhibited by these students is so severely out of line with any form of standards regarding the performance of scientific experimentation, that a six-month suspension is by no means a sufficient penalty.

If projects performed at Auburn University are to have any shred of credibility whatsoever, every single project which either of these two graduate students touched must be investigated. Additionally, their six-month suspension must be made PERMANENT. There is no excuse whatsoever for their lackadaisical attitude. Their actions not only potentially endangered Auburn staff, but may also have rendered multiple scientific projects virtually meaningless. They must never be allowed to handle animals again!

The PI and Co-I investigator also seem to be virtually oblivious of how their project was being performed. The PI simply referred people to the Co-I, and the Co-I was either misinformed, or was being evasive, because initially the hazardous drugs were supposedly being given post-mortem, then that story changed. It is also suspicious that one of the drug entries was blacked out, an obvious attempt at a cover-up which amounts to falsification of records. The almost total lack of knowledge exhibited by the PI and Co-I indicates a very casual attitude about experimentation. They also deserve a more serious penalty, a much longer, if not permanent, suspension of animal use privileges.

However, some of the most serious questions raised by this report come from omissions. There are many significant facts that appear to have been withheld, and I can only assume that this is deliberate. Why, in a report filed with the Office of Laboratory Animal Welfare, are there almost no mentions of the animals? Nowhere in this report is there a discussion as to whether these non-protocol hazardous drugs (which turned out to have been administered while the animals were alive) had any impact on the animals! In fact, nowhere in this report is there even a mention as to what species of animals is used in this project. This can only be interpreted as an intentional effort to withhold information from

this document, and thereby to withhold it from the public. In light of this situation, Auburn needs to come clean and not only reveal what species of animals were involved, but the veterinary records of these animals should also be released to the public, otherwise this issue will always be immersed in the stench of a cover-up!

In summary, I am calling upon your office to do three things to restore the credibility of the Auburn University research program:

1. Launch an immediate and independent investigation into every protocol in which the two offending graduate students were involved. Without this probe, questions will always exist about every other project they touched.
2. Permanently revoke the animal use privileges of these two graduate students, and the PI & Co-I. Their total lack of concern for proper procedure as well as their lack of concern for the safety of Auburn University staff should disqualify them from participation in all animal related projects.
3. Publicly disclose the species and number of animals used in this project, along with the veterinary records for these animals, so that their condition and welfare can be assessed.

This incident has seriously damaged the integrity of the Auburn University research program. You must act decisively to restore the lost credibility.

I will await action from your office, and expect to receive a reply within five (5) business days.

Sincerely,

Michael A. Budkie, A.H.T.
Michael A. Budkie, A.H.T.,
Executive Director, SAEN

Attachment: Auburn University Report

A3152-1A



AUBURN
UNIVERSITY

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July 15, 2019

Dr. Brent Morse
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Assurance Number: D16-00092 (A3152-01)

Dr. Morse:

This is a report of non-compliance and revocation of animal care and use privileges of a Principal Investigator (PI), a Co-Investigator (Co-I), and two graduate students at Auburn University. The animal activity at issue was not funded by PHS or NSF, but the activity took place in a facility included in the OLAW assurance referenced above.

Review of the situation:

On May 9, 2019 the Director of Laboratory Animal Health sent an email to the PI and Co-I informing them that medical records indicated that hazardous drugs had been given to their animals without IACUC approval and in a location not approved for safe handling of hazardous drugs. The email requested clarification of the situation. The Co-I responded that although the administration of hazardous drugs had been planned, they had not been given to live animals and instead were injected post mortem. The next day, the hazardous drug entry in the medical record was found to have been blacked out. However, further documentation of hazardous drug administration was found on associated cage cards. The Director called the IACUC Chair to report the incident and request an investigation.

Over the next several days, the IACUC Chair conducted phone calls with the PI and Co-I. The PI indicated that the Co-I was responsible for conducting the animal procedures. Subsequently, the IACUC Chair and the Director conducted another phone call with the Co-I. The Co-I acknowledged that the hazardous drugs were not on the approved protocol and that due to miscommunication between the Co-I and the students, the drugs were given to the animals while they were alive rather than post-euthanasia. As the Co-I took responsibility for the error, the investigation was not pursued further.

On June 6, 2019, the incident was presented to the IACUC for discussion. The discussion resulted in the IACUC requesting that interviews of the two graduate students be conducted by the Director and IACUC Chair. Interviews of the two students indicated that the number of animal protocols on which they worked was very high, so effective communication among laboratory members appeared inadequate.

One student had not read the animal protocol. The other student had read the protocol but despite this knowledge had proceeded to administer the hazardous drugs. Neither student routinely read the protocols on which they worked. Moreover, there was an apparent lack of concern that they had conducted activities without IACUC approval and had put animal care workers at risk by using unauthorized hazardous agents in an animal care room not approved for safe handling of such drugs.

Decisions by the IACUC:

Based on the investigation, the IACUC identified several concerns related to 1) animal care and use, 2) appropriate communication among laboratory members regarding animal treatment, 3) appropriate handling of hazardous agents and regard for the well-being of others impacted by these actions, 4) familiarity with IACUC protocols and policies, and 5) general ethical conduct expected of researchers.

In light of these concerns, at the IACUC meeting on June 20, 2019, the IACUC voted to:

- 1) Suspend the PI, Co-I and 2 graduate students from conducting any animal activities at Auburn University for a period not less than six months.
- 2) Require successful retraining by completion of required IACUC training modules (online)
- 3) Require successful retraining on the use of hazardous materials
- 4) Require successful retraining on the use of the two primary rodent vivaria on the Auburn University campus
- 5) Require successful retraining on the Ethical Conduct of Research (administered by the Auburn University Office of Research Compliance)
- 6) Require a post-training interview with members of the IACUC
- 7) The suspensions of the individuals, as well as the IACUC-approved protocol, will continue until the above requirements are met by the individuals identified.

After consultation with the Institutional Official, letters indicating the above actions were sent to the PI, Co-I, and the two graduate students on July 8, 2019.

An appeal letter was submitted from the Co-I to the IACUC Chair on July 10, 2019. The letter was discussed at the next IACUC meeting on July 11, 2019. The IACUC voted to maintain its' decision of June 20, 2019 without change.

If any additional information is required, please contact the Office of Research Compliance at (b) (6) or IACUCAdmin@auburn.edu.

Sincerely,

(b) (6)

James Weyhenmeyer, Ph.D.
Auburn University Institutional Official
Vice President for Research

(b) (6)

Timothy D. Braden, Ph.D.
Auburn University IACUC Chair
Associate Professor
Anatomy, Physiology & Pharmacology

cc: University Veterinarian – Dr. P. Rynders