



INSPECTION REPORT

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SCRIPPS RESEARCH INSTITUTE

Customer ID: 1192
Certificate: 93-R-0015

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SCRIPPS RESEARCH INSTITUTE

Inspection
Type: ROUTINE INSPECTION
Date: MAR-09-2004

- 2.31 (d X 1 X I) DIRECT
- 2.31 (d X 1 X II)
- 2.31 (d X 1 X iv X B)
- 2.31 (d X 3)
- 2.31 (d X 6)

INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE (IACUC).

2.31(d) (1) (i) IACUC Procedures involving animals will avoid or minimize discomfort, distress and pain to the animals.

The IACUC in consultation with the attending veterinarian developed Body Composition Scores for primates involved with food restriction protocols. This was a method used to assist the veterinary staff in making a determination of the status of animals on food restriction and a tool to avoid or minimize discomfort and distress. The following instance indicates that the IACUC allowed research to continue against expert veterinary recommendations because clinical signs of distress were not present.

A primate was scored by the attending veterinarian as unsatisfactory (BCS of <2.0) to continue on the food deprivation study. The IACUC determined that since there were no clinical signs indicating the animal was in distress or discomfort food restriction could continue.

An IACUC policy to prevent the use of animals that may suffer from pain and distress is titled, "Prevention and Treatment of Pain and Distress". This was put in place to prevent animals from unrelieved pain or distress. The IACUC policy states that diagnosis of pain and distress in veterinary medicine is a subjective process based on a combination of good examination skills, and a familiarity with the species. It continues to say that regardless of the clinical signs demonstrated, if there is any doubt that an animal may be experiencing pain with a particular protocol, treatment is indicated. In this case, as mentioned above, the veterinarian examined the animal and all other records pertaining to this animals use and determined that the animal was in unsatisfactory condition and should not continue on the restriction study.

There is also no indication that animals are allowed to rest after prolonged food restriction. Animals are on dietary restrictions for up to and in some cases over a year and may be used on other restrictive studies without resting periods. These practices allows for distress and discomfort without minimization. Programs must be put in place to resolve these issues and to minimize distress and discomfort.

Since the initial inspection, animals are no longer restricted in their diets and consultants are utilized to improve this aspect of the program.

Correct by June 1, 2004

Section 2.31(d) (1) (ii) IACUC The principle 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 descriptions of methods and sources used to determine that alternatives were not available.

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Date:
APR-06-2004

Title: VETERINARY MEDICAL OFFICER

Received By: _____

Date:
APR-06-2004

Title: (b)(6), (b)(7)c(demo)



Animal and Plant Health Inspection Service

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Food restriction methods used at this institution did cause distress in few primates, evidenced by feeding regimes, veterinary examinations and body composition scoring.

Review of primate-feeding records indicated that primates may have been restricted up to 71% of their daily feed ration on Sunday through Thursday, and then fed their "full ration" on Friday and Saturday.

In one case, an animal (#458) had a BCS of 1.5, it was then provided with 85 % of its' the daily ration of feed. Once the animal reached 2.0 Body Composition Score (BCS), it was placed back on 50% daily feed ration. Practices such as this may cause an animal to return to the 1.5 BCS and may be considered distressful.

Another example, is #412, this primate was received at the institution in August 2001 and began food restriction for behavioral training in January 2002. The amount of daily feed provided to the animal was not recorded in the records, so no data is available to determine amounts of food provided to the animal in the initial food restriction procedures. Veterinary documentation indicated the animal had patchy alopecia, poor re-growth of shaved hair and BCS of 1.5. This animal was considered unsatisfactory for further food restriction until it reached a BCS of 2.0. These restrictive procedures may cause distress to an animal that is unrelieved and unnecessary. These are two examples of animals on food deprivation protocols indicating a need to explore alternatives to these procedures.

Adequate alternative searches for procedures that reduce distress to the animals in the food deprivation portion of the protocol were not conducted. Alternatives can be obtained from other research institutional programs of food restriction in primates. The Guidelines for the Care and Use of Mammals in Neuroscience and Behavioral Research or better known as "The Red Book" is one resource that the investigator and IACUC could use for guidance in the food restriction procedures.

The IACUC must ensure that all aspects of a protocol that may cause distress to animals are considered and alternatives are not available prior to approving procedures within a protocol that may cause more than momentary pain and distress. Since the initial inspection, animals are no longer restricted in their diets and consultants are utilized to improve this aspect of the program.

Correct June 1, 2004

2.31(d) (1) (iv) (B) IACUC Involve in their planning, consultation with the attending veterinarian or his or her designee.

An investigator administered more than twice the approved dosage on MDMA to a primate on two separate occasions. The first instance of not following the IACUC approved protocol was on February 11, 2004 and the second instance was on February 25, 2004.

The animal died on February 25 the second time the drug was administered in higher amounts than required by the written protocol. The protocol required 3 doses given 3 hours apart but records indicated the doses were given at a closer frequency than specified in the protocol or one of the three doses were not given at all. The IACUC committee at a convened meeting on March 4, 2004 suspended that activity/protocol, which is according to section 2.31 (d) (7). The Federal funding agencies and USDA, APHIS Animal Care were not notified at the time of this inspection but have since been notified.

The above animal had a medical condition and veterinary consultation may have determined this animal was not compatible for this study. Documented in the medical record was a holocystolic heart murmur. The institution lacked an adequate process for consultation with the attending veterinarian on the selection of animals used on this study. Animals that are in poor condition or that have diseases documented by the attending veterinarians must not be selected for research studies, unless veterinary approval is given. Consulting with the attending veterinarian on an animal's health status prior to the investigators use on protocols is a useful tool in selecting and using only healthy animals.

Any animal used in research that has disease processes calls into question the validity of information obtained from scientific procedures and may make interpretation and duplication of results difficult or even impossible. If an animal is suffering distress or pain, it may affect the results of the research. In scientific work involving living animals, the most reliable results are most likely obtained using healthy animals.

Correct by June 1, 2004

Section 2.31(d) (3) IACUC - The IACUC may invite consultants to assist in the review of complex issues arising out the review of proposed activities. Consultants may not approve or withhold approval of an activity and may not vote with the IACUC unless they are also members of the IACUC.

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APR-06-2004

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Food restriction procedures were approved by the IACUC without input from persons knowledgeable in either food restriction or primate behavior. This led to primates that were fed less than their daily minimum food requirements and in some cases considered unsatisfactory by the attending veterinarian. The IACUC, when reviewing protocols/procedures without expertise in a particular discipline, must use consultants or individuals with experience and knowledge to assist in the development of acceptable protocol/procedures. In doing so, both science and animal welfare concerns will be weighed equally and animals will not be distressed in the process.

Since the initial inspection, consultants have been utilized to assist the IACUC in reviewing the animal welfare program.
Correct by June 1, 2004

2.31(d)(6) IACUC The IACUC may suspend an activity that it previously approved if it determines that the activity is not being conducted in accordance with the description of that activity provided by the principal investigator and approved by the Committee.

The food restriction procedures in the behavioral studies, when first written and approved did not provide adequate monitoring of an animals feed intake or provide guidelines regarding the amount of food that would be withheld or the length of time an animal could be on restrictive diet protocols. The IACUC in the infancy of these types of procedures should have suspended the studies, re-evaluated and quite possibly sought outside help in devising a program that was effective in providing good science and good animal welfare.

Presently the IACUC is re-evaluating the procedures and seeking outside consultants.
Correct by June 1, 2004

2.33 (b) (2)

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE.

(b) Each research facility shall establish and maintain programs of adequate veterinary care that include: (2) The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and the availability of emergency, weekend, and holiday care

Several expired items were noted during this inspection, i.e. Acepromazie, 5/03, Buprenorphine, 3/02 and Potassium Chloride, 9/03. These drugs were under the control of the Principle Investigator and were not labeled and separated from current dated ones. When used in animals expired drugs may cause unexpected reactions or may not be effective at all. The facility shall ensure that only current dated drugs are given to animals for effective results.
Corrected during inspection.

2.38 (f) (2) (II)

DIRECT

MISCELLANEOUS.

Deprivation of food or water shall not be used to train, work, or otherwise handle animals; Provided, however: That the short-term withholding of food or water from animals, when specified in an IACUC-approved activity that includes a description of monitoring procedures, is allowed by these regulations.

The primates used in behavioral studies have feeding records indicating primates may receive 30-75% of the daily ration on Sunday through Thursday and ad lib on Friday and Saturday. Several primates received 35% of their daily ration to encourage the primate perform in behavioral type studies. This study was initially approved without descriptions of monitoring procedures, daily feed minimum requirements or adequate oversight.

Restriction of food in this manner should not be permitted. This type of restriction was out of the scope of the approved animal protocol. All efforts must be made to ensure animals are never deprived of food in attempts to train or work.
Correct by June 1, 2004

Prepared By: Michael Smith / Michael Smith
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3.81 (b)

ENVIRONMENT ENHANCEMENT TO PROMOTE PSYCHOLOGICAL WELL-BEING.

(b) Environmental enrichment. The physical environment in the primary enclosures must be enriched by providing means of expressing non-injurious species-typical activities. Species differences should be considered when determining the type or methods of enrichment. Examples of environmental enrichments include providing perches, swings, mirrors, and other increased cage complexities; providing objects to manipulate; varied food items; using foraging or task-oriented feeding methods; .

Approximately 60% of single-housed non-human primates are noted without floor or hanging toys for them to manipulate. Protocols reviewed and the facility's environmental enhancement program indicated that these primates are to be given these toys when in their home cages. A big box containing clean toys supposedly to be given to the primates was noted in one of the rooms inspected. The facility shall ensure that these primates are provided these toys and other enrichment items as indicated in their environmental enhancement program.

Correct by June 1, 2004.

3.82 (a)

DIRECT

FEEDING.

The diet for nonhuman primates must be appropriate for the species, size, age, and condition of the animal, and for the conditions in which the nonhuman primate is maintained, according to generally accepted professional and husbandry practices and nutritional standards. The food must be clean, wholesome, and palatable to the animals. It must be of sufficient quantity and have sufficient nutritive value to maintain a healthful condition and weight range of the animal and to meet its normal daily nutritional requirements.

Diets that are provided to the primates involved in food restriction/deprivation are not meeting the normal daily nutritional requirements. Primates are deprived of daily nutritional requirements for behavioral studies at this institution for five consecutive days and on the remaining two days of the week, usually Friday and Saturday, are allowed to meet daily nutritional requirements via adlib feeding or a full ration of feeding.

As earlier indicated, some animals have been restricted up to 35% of normal daily intake. The above regulation does not indicate that food provided to non-human primates can be averaged over a seven-day period but that the food provided to the primates must meet the animal's nutritional requirements for each day. The entire program of food restriction at this institution should be reviewed in consultation with experts in food restriction and primate behavior.

Correct by June 1, 2004

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APR-06-2004

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