



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare  
6700B Rockledge Drive, Suite 2500, MSC 6910  
Bethesda, Maryland 20892-6910  
Home Page: <http://grants.nih.gov/grants/olaw/olaw.htm>

FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare  
6700B Rockledge Drive, Suite 2500  
Bethesda, Maryland 20817  
Telephone: (301) 496-7163  
Facsimile: (301) 402-7065

August 26, 2019

Re: Animal Welfare Assurance  
#A3284-01 (OLAW Case 1X)

Dr. Jill Pipher  
Vice President for Research  
Brown University  
47 George Street -Box 1937  
Providence, Rhode Island 02912

Dear Dr. Pipher,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your letter dated August 22, 2019 reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Brown University. According to the information provided, OLAW understands that during a recent semiannual inspection it was determined that a mouse that had been reported as in need of euthanasia by a veterinary technician two days prior was not euthanized by the lab nor had the veterinary technician nor the lab followed-up on the report. The animal was now moribund and was immediately euthanized. It was not stated if this protocol was PHS or NSF funded.

Corrective actions include: Animal Care will issue a new plan for communication and processes to ensure that treatments/euthanasia requests are followed as directed, and; the PI will create a process to ensure that the laboratory has acknowledged receipt of Animal Care staff notices and a confirmation of treatment/euthanasia has been sent.

Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate this incident, provide corrective measures, and prevent recurrence. OLAW advises that the IACUC consider communicating the new plan by Animal Care to *all* labs using animals. OLAW concurs that the incident warranted reporting. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

(b) (6)

Brent C. Morse, DVM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare

cc: IACUC Contact



BROWN

August 22, 2019

Axel Wolff, DVM  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
Rockledge 1, Suite 360  
6705 Rockledge Drive  
Bethesda, MD 20892

RE: Report of noncompliance, Assurance #A3284-01

Dear Dr. Wolff:

The Brown University IACUC, through the Institutional Official (Jill C. Pipher, Ph.D.), is writing to provide OLAW with a final report of the following noncompliance with the *PHS Policy on Humane Care and Use of Laboratory Animals* ("PHS Policy"):

During semi-annual facility inspections occurring on July 31, 2019, the inspection team identified an animal welfare concern related to a moribund mouse that had been flagged with a health monitoring card. A veterinary technician had identified the health concern and notified the lab that euthanasia needed to be conducted by the laboratory, close of business the following day. Neither the veterinary technician nor the PI's laboratory followed up on the euthanasia notice sent. As a result, the animal was found in a moribund state during semi-annual inspections two days later which resulted in immediate euthanasia of the mouse.

The IACUC discussed the incident of animal welfare concern and determined that it is reportable under the NIH NOT-OD-05-034, "*Guidance on Prompt Reporting to OLAW under the PHS Policy on Humane Care and Use of Laboratory Animals*":

The following corrective action has taken, or will take, place:

- Animal Care will conduct a process evaluation for communication and follow-up responsibilities when sending notices to Principal Investigators. This evaluation will result in a new plan for communication and processes to ensure that treatments/euthanasia requests are followed as directed.
- The PI will create a process to ensure that the laboratory has acknowledged receipt of Animal Care staff notices and a confirmation of treatment/euthanasia has been sent.

Brown University is committed to protecting the welfare of animals used in research and

appreciates the guidance and assistance provided by OLAW in this regard. If you have any questions or concerns regarding this report, please contact (b) (6)

Thank you for your consideration of this matter.

Sincerely,

(b) (6)

Jill C. Pipher, Ph.D.  
Vice President for Research, Institutional Official  
Brown University

cc: Diane Hoffman-Kim, PhD, IACUC Chair  
(b) (6)  
Keri Godin, Director, Office of Research Integrity  
Lara Helwig, DVM, Attending Veterinarian

**Morse, Brent (NIH/OD) [E]**

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Thursday, August 22, 2019 10:20 AM  
**To:** IACUC; OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** Diane Hoffman-Kim; Lara Helwig; (b) (6) Keri Godin; Jill Pipher  
**Subject:** RE: Event Report - Assurance A328401

Thank you for providing this report (b) (6) We will send an official response soon.

Best regards, Brent Morse

Brent C. Morse, DVM, DACLAM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health

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**From:** (b) (6) **On Behalf Of IACUC**  
**Sent:** Thursday, August 22, 2019 10:02 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Diane Hoffman-Kim <Diane\_Hoffman-Kim@brown.edu>; Lara Helwig <lara\_helwig@brown.edu>; (b) (6)  
(b) (6) Keri Godin <keri\_godin@brown.edu>; Jill Pipher <jill\_pipher@brown.edu>;  
accredit@aaalac.org  
**Subject:** Event Report - Assurance A328401

Good morning Dr. Wolff,

Please see the attached reportable event that was discussed at the August 2, 2019 IACUC meeting. Please feel free to contact me with any questions.—

Sincerely,

(b) (6)