



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) 480-3387

June 9, 2021

Re: Animal Welfare Assurance  
#A3284-01 (OLAW Case 2M)

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

Dear Dr. Pipher,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your letter dated May 28, 2021 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 on April 13, 2021, a student performed euthanasia on a pacu fish via MS222 buffered solution. Once opercular movement stopped, the student waited 10 minutes before placing the fish within the carcass refrigerator. After approximately 30 minutes of the fish being placed in the carcass refrigerator, another member of the lab discovered that the fish was still alive. The cause of the incident was determined to be use of improperly mixed MS-222 and insufficient post-euthanasia observation time. This animal activity is NSF-supported (GR5260181).

The following corrective/preventive actions have taken, or will take, place:

- Retraining all lab members in euthanasia expectations when using buffered MS-222;
- The lab manager will directly supervise the individual responsible for the incident during euthanasia for all fish surgeries and future euthanasia attempts for six months.
- The laboratory SOP for euthanasia must be updated to include a step-by-step set of instructions for mixing MS-222 and performing euthanasia using the IACUC's approved MS222 Policy for reference.

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 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  
NSF Animal Welfare Officer



# BROWN

May 28, 2021

Brent Morse, 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  
NSF GR5260181

Dear Dr. Morse:

The Brown University Institutional Animal Care and Use Committee (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"):

On April 13, 2021, a student performed euthanasia on a pacu fish via MS222 buffered solution. Once opercular movement stopped, the student waited 10 minutes before placing the fish within the carcass refrigerator. After approximately 30 minutes of the fish being placed in the carcass refrigerator, another member of the lab discovered that the fish was still alive. The cause of the incident was determined to be use of improperly mixed MS-222 and insufficient post-euthanasia observation time. The incident was not reported in full detail until two weeks after the occurrence as the Attending Veterinarian was on vacation at the time of the initial notice. No additional attempt was made to notify other Center for Animal Resources and Education (CARE) staff or the IACUC office.

The IACUC discussed the incident of animal welfare concern at its May 14, 2021 convened meeting and determined that the lab was responsible for the incident described which meets the criteria for reporting per the NIH NOT-OD-05-034, "Guidance on Prompt Reporting."

The following corrective actions have taken, or will take, place:

- Retraining all lab members in euthanasia expectations when using buffered MS-222 by

the CARE staff;

- The lab manager will directly supervise the individual responsible for the incident during euthanasia for all fish surgeries and future euthanasia attempts for six months. After this time and provided the lab member has demonstrated consistent proficiency, the individual will be permitted to perform euthanasia individually with lab manager review of the logs post-procedure.
- The laboratory SOP for euthanasia must be updated to include a step-by-step set of instructions for mixing MS-222 and performing euthanasia using the IACUC's approved MS222 Policy for reference.

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,

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

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

## Wolff, Axel (NIH/OD) [E]

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Tuesday, June 1, 2021 6:56 AM  
**To:** IACUC  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Report of noncompliance, Assurance #A3284-01 NSF GR5260181

Thank you for this report, (b) (6) We will send a response soon.

Axel Wolff, M.S., D.V.M.  
Deputy Director, OLAW

**From:** (b) (6) On Behalf Of IACUC  
**Sent:** Friday, May 28, 2021 11:58 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>; Diane Hoffman-Kim <Diane\_Hoffman-  
(b) (6) Keri Godin <keri\_godin@brown.edu>; Lara Helwig <lara\_helwig@brown.edu>; (b) (6)  
(b) (6) accredit@aaalac.org  
**Subject:** Report of noncompliance, Assurance #A3284-01 NSF GR5260181

Hello,

Please see the attached report for (b) (6) project.

Thanks,

(b) (6)