



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

July 6, 2021

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

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 June 29, 2021 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Brown University. This letter had not been preceded by a preliminary report to OLAW.

According to the information provided, this Office understands that the Brown University Animal Care and Use Committee (ACUC) determined that instances of noncompliance occurred with respect to: conditions that jeopardized the well-being of animals and resulted in harm to animals. The final report states on May 3, 2021, a lab member preparing for a surgical procedure, placed a pacu fish in a container of buffered MS222 that also included an aquarium water heater. It is stated the heater was provided after the lab determined additional preparation for surgery was needed. Following the procedure, a thermal burn was observed on the fish. The veterinary team was notified, and the fish was provided treatment and fully recovered, per the report.

The matter was discussed at the June 4, 2021 convened meeting of the IACUC. The following corrective actions were determined in response to the incident:

- CARE will provide retraining to the individuals involved on topics of anesthesia safety and surgical preparation. The expectation that preparations will be completed prior to anesthesia will be communicated as part of the training.
- Should an unexpected event occur that requires holding of a fish prior to surgery, the lab will remove the aquarium heater prior to placing fish into the bucket.

It is noted that this project is supported by NSF funds. Based on its assessment of this explanation, OLAW understands that the Brown University has implemented appropriate measures to correct and prevent recurrences of these problems and is now compliant with provisions of the PHS Policy.

We appreciate being informed of these matters and find no cause for further action by this Office.

Sincerely,
Jacquelyn T.
Tubbs -S
Jacquelyn Tubbs, DVM, DACLAM
Animal Welfare Program Specialist
Division of Compliance Oversight
Office of Laboratory Animal Welfare

Digitally signed by Jacquelyn T.
Tubbs -S
Date: 2021.07.06 13:38:20 -04'00'

cc: IACUC Contact



BROWN

June 29, 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 May 3, 2021, a member of the PI's lab was preparing for a surgical procedure and placed a pacu fish into a bucket of buffered MS222 solution with an aquarium water heater in it. The heater had been placed into the solution after the lab realized they had some additional surgery preparation to do. After the procedure, a thermal burn was discovered on the fish and was determined to be the result of the fish brushing up against the heater. The veterinary team was contacted and the fish was placed on a treatment plan where it recovered fully.

The IACUC discussed the incident of animal welfare concern at its June 4, 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:

- CARE will provide retraining to the individuals involved on topics of anesthesia safety and surgical preparation. The expectation that preparations will be complete prior to anesthesia will be communicated as part of the training.

- Should an unexpected event occur that requires holding of a fish prior to surgery, the lab will remove the aquarium heater prior to placing the fish into the bucket

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)

(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, Senior Director, Office of Research Integrity
Lara Helwig, DVM, Director of CARE, Attending Veterinarian
AAALACi

Walker, Keri (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Wednesday, June 30, 2021 8:14 AM
To: IACUC
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Report of noncompliance, Assurance #A3284-01 NSF GR5260181

Good morning,

Thank you for this report. We will send a response soon.

Best,
Keri

*Keri Walker
Program Analyst
Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health
6700B Rockledge Dr., Suite 2500
Bethesda, MD 20892
301-435-2390
keri.walker@nih.gov*

From: (b) (6) On Behalf Of IACUC
Sent: Tuesday, June 29, 2021 8:00 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>; (b) (6)
accredit@aaalac.org; Lara Helwig <lara_helwig@brown.edu>
Subject: Report of noncompliance, Assurance #A3284-01 NSF GR5260181

Hello,

Please see the attached report for an incident involving Dr. Brainerd's project.

Thank you!

(b) (6)

