



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

October 15, 2021

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

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 September 27, 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 health and well-being of animals and resulted in harm and death to animals. The final report details three incidents that occurred in July and August of this year. Incident #1 involved a mouse that was found dead after its tail was caught in the cage lid during cage change procedure and was unable to access water. Incident #2 involved a mouse that was found dead, and another was discovered dehydrated (and recovered with treatment) due to inappropriate water bottle placement. Incident #3 involved a mouse discovered moribund and without feed. Ultimately, the animal was humanely euthanized.

The IACUC reviewed these incidents and the following corrective actions occurred:

- The ACTs responsible for the first and third incidents were retrained.
- The ACT involved in the second incident was initially placed on probation and retrained. The individual gave notice of employment termination within two weeks of hire due to the error and is no longer at Brown University.
- Institutional cage changing procedures for cages of the type involved in the third incident were evaluated and altered to prevent future incidents.

It is noted that these projects are supported by PHS funding. 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

Digitally signed by Jacquelyn T.  
Tubbs-S  
Date: 2021.10.15 09:04:15 -04'00'

Jacquelyn Tubbs, DVM, DACLAM  
Animal Welfare Program Specialist  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare

cc: IACUC Contact



# BROWN

September 27, 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

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 July 3, 2021 a mouse was found deceased after the tail was caught in the cage lid during cage changing and was unable to access water.
- On August 8, 2021 a mouse was found deceased and another mouse was found dehydrated due to inappropriate water bottle placement. The second mouse was treated by veterinary staff and made a full recovery.
- On August 16, 2021 a mouse was found moribund without feed. The mouse was evaluated by veterinary staff and humanely euthanized.

The IACUC discussed the incidents of animal welfare concern related to these mice which were on PHS funded projects. The committee determined that the incidents described meet the criteria for reporting per 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 actions have taken, or will take, place:

- The ACTs responsible for the first and third incidents were retrained.
- The ACT involved in the second incident was initially placed on probation and retrained. The individual gave notice of employment termination within two weeks of hire due to the error and is no longer employed at Brown.
- Institutional cage changing procedures for cages of the type involved in the third incident were evaluated and altered to prevent future incidents.

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, Attending Veterinarian  
AAALACi

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Wednesday, September 29, 2021 7:51 AM  
**To:** IACUC  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Report of noncompliance, Assurance #A3284-01

Thank you for these reports, (b) (6) We will send responses soon.

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

**From:** (b) (6) On Behalf Of IACUC  
**Sent:** Tuesday, September 28, 2021 9:37 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Jill Pipher <jill\_pipher@brown.edu>; (b) (6) Helwig, Lara <lara\_helwig@brown.edu>; Diane Hoffman-Kim <Diane\_Hoffman-Kim@brown.edu>; Keri Godin <keri\_godin@brown.edu>  
**Subject:** Report of noncompliance, Assurance #A3284-01

Good morning,

Please find attached reports regarding recent incidents of noncompliance discussed by the Brown University IACUC during its September 10, 2021 convened meeting.

Please let us know if you have any questions.

Thanks,

(b) (6)

