



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

February 28, 2022

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

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 February 11, 2022 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 October 14, 2021, the wrong dose of buprenorphine was administered to a rat during surgery and the rat subsequently died. The incident was discovered on a routine records review during semiannual inspection in January 2022 and it was determined that the lab manager had forgotten to submit a report to the IACUC. A report was submitted immediately after the inspection. This animal activity is NSF-supported (GR5260201, GR5270177, GR5271105).

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

- The student performing the procedure was retrained
- A second person will check all drug doses prior to administration
- The lab was reminded of the importance of prompt reporting

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,

Brent C. Morse - Digitally signed by Brent C.

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Morse -S

Date: 2022.02.28 08:56:10 -05'00'

Brent C. Morse, DVM

Director

Division of Compliance Oversight

Office of Laboratory Animal Welfare

cc: IACUC contact
NSF Animal Welfare Officer

13284-24



BROWN

February 11, 2022

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
GR5260201
GR5270177
GR5271105

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 October 14, 2021, the wrong dose of buprenorphine was administered to a rat during surgery and the rat subsequently died. The incident was discovered on a routine records review during semiannual inspection in January 2022 and it was determined that the lab manager had forgotten to submit a report to the IACUC. A report was submitted immediately after the inspection.

The IACUC discussed the incident of animal welfare concern at its February 4, 2022 convened meeting and determined that the incident meets 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 student performing the procedure was retrained
- A second person will check all drug doses prior to administration
- The lab was reminded of the importance of prompt reporting

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)

Lara Helwig, DVM, Director of CARE, Attending Veterinarian
AAALAC International

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Friday, February 18, 2022 7:40 AM
To: IACUC
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: [EXTERNAL] Report of noncompliance, Assurance #A3284-01

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: Monday, February 14, 2022 3:07 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>; accredit@aaalac.org; (b) (6)
(b) (6) Diane Hoffman-Kim <Diane_Hoffman-Kim@brown.edu>; Helwig, Lara
<lara_helwig@brown.edu>; (b) (6) Jill Pipher <jill_pipher@brown.edu>
Subject: [EXTERNAL] Report of noncompliance, Assurance #A3284-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and are confident the content is safe.

Good afternoon,

Please find attached a report regarding an incident of noncompliance discussed by the Brown University IACUC during its February 4, 2022 convened meeting.

Please let us know if you have any questions.

Thanks,

(b) (6)