



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

March 31, 2022

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

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 March 22, 2022 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: administration of expired drugs to animals. The final report states a records review during semiannual inspection revealed a dose of expired euthanasia solution was administered to a rat. It is understood that a previous instance involving use of an expired substance in animals has occurred in this laboratory within the past 2 years. The IACUC reviewed the matter and the following corrective actions have taken or will take place:

- All laboratory members must receive retraining on handling of controlled substances.
- The laboratory must submit a plan detailing future actions designed to prevent future incidents involving use of expired materials.

It is noted that this research is 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: 2022.03.31  
11:23:45 -04'00'

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

cc: IACUC Contact



BROWN

March 22, 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

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").

During a semiannual inspection in February 2022, a routine records review revealed that a dose of expired euthanasia solution was administered to a rat. The euthanasia solution had expired the previous month. It was noted that a previous instance of expired substance use in animals had occurred in this laboratory within the past two years.

The IACUC discussed the finding related to these animals which were supported by PHS funds at its March 4, 2022 convened meeting. The committee determined that the finding 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:

- All laboratory members must receive retraining on handling controlled substances.
- The laboratory must submit a plan detailing future actions designed to prevent future incidents involving use of expired materials.

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:

(b) (6)

Lara Helwig, DVM, Attending Veterinarian

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Wednesday, March 23, 2022 7:25 AM  
**To:** IACUC  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: [EXTERNAL] 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, March 22, 2022 11:34 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Jill Pipher <jill\_pipher@brown.edu>; (b) (6)  
(b) (6) Helwig, Lara <lara\_helwig@brown.edu>; (b) (6)  
**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 see the attached reports regarding incidents of noncompliance discussed by the Brown University IACUC during its March 4, 2022 convened meeting.

Please let us know if you have any questions.

Thanks,

(b) (6)