



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

February 14, 2019

Re: Animal Welfare Assurance
#A4752-01 (OLAW Case 1L)

Ms. Allison P. Moriarty
Vice President, Research Administration
and Compliance
Brigham and Women's Hospital
75 Francis Street
Boston, MA 02115

Dear Ms. Moriarty,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your February 11, 2019 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Brigham and Women's Hospital. According to the information provided, OLAW understands that a live rat was found in a refrigerator after a suspected failed carbon dioxide narcosis euthanasia attempt. A required secondary method of euthanasia had not been performed. The rat was subsequently euthanized. It was not determined if the rat in question was assigned to an activity receiving PHS or NSF funding.

Preventive actions included all rat users in the building receiving a targeted notification reviewing the proper rat euthanasia procedures. Veterinary staff will provide a retraining on rat euthanasia to the rat user group in the building where the incident occurred. All rat users in the animal care and use program will be required to undergo retraining on rat euthanasia.

The consideration of this matter by Brigham and Women's Hospital was consistent with the philosophy of institutional self-identification and self-regulation. Similarly, the actions taken to resolve the issue were appropriate and would be expected to prevent a recurrence of this incident. We appreciate being informed of this matter and find no cause for further action by this office at this time.

Sincerely,

(b) (6)

Brent C. Morse, DVM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC Chair
Director of Research Subjects Protection and Laboratory Safety Compliance



BRIGHAM AND WOMEN'S HOSPITAL

Institutional Animal Care and Use Committee

Brent Morse, D.V.M., DACLAM
Acting Director, Division of Compliance Oversight Office of Laboratory Animal Welfare National
Institutes of Health
Rockledge 1, Suite 360, MSC 7982
6705 Rockledge Drive
Bethesda, MD 20892-7982

February 11, 2019

FINAL REPORT

Non-Compliance Report: Assurance **A4752-01**
Brigham and Women's Hospital IACUC
Funding: N/A

Dear Dr. Morse,

This letter serves as a final report on a resolved issue of non-compliance that has been reviewed by the Brigham and Women's Hospital Institutional Animal Care and Use Committee.

One rat was found in the refrigerator after a suspected failed Carbon Dioxide narcosis euthanasia. A secondary method of euthanasia was not performed to ensure death as required for this primary method. The rat was immediately euthanized by the veterinary technician who found the animal.

The IACUC extensively discussed this incident at the most recent meeting and voted to implement the following additional corrective actions:

- All rat users in the building received a targeted notification reviewing the proper rat euthanasia procedures
- The veterinary staff will provide a retraining on rat euthanasia to the rat user group in the building where the incident occurred.
- All rat users in the animal care and use program will be required to undergo retraining on rat euthanasia.
- Training records will be closely audited by the IACUC to ensure completion and compliance.

Upon completion of the rat euthanasia retraining and subsequent audit by the IACUC to ensure completion of the trainings, the Committee will consider this incident formally resolved. We will continue to report to OLAW if any similar issues occur in the future. Additionally, our institution and animal care and use committee takes the failure to ensure death after euthanasia procedures extremely seriously and we welcome any suggestions that OLAW may be able to offer.

Thank you for your review of these incidents. Please let us know if any further action is required at this time.

Sincerely,

(b) (6)

Alison Moriarty

Vice President, Research Administration and Compliance Institutional Official for the BWH IACUC

CC: **Amber Hoggatt, DVM, DACLAM**
Attending Veterinarian & Director, Center for Comparative Medicine, Brigham & Women's Hospital

Srinivasan Mukundan, Jr., Ph.D., M.D.
Chairman, Brigham & Women's Hospital Institutional Animal Care and Use Committee

(b) (6)

Kathryn Holthaus, MS, MA

Director of Research Subjects Protection and Laboratory Safety Compliance

75 Francis Street, OBC 3-012C, Boston, MA 02115

Tel: (b) (6) Fax: (b) (6)

APMoriarty@partners.org

A Teaching Affiliate

of Harvard Medical School

A FOUNDING MEMBER OF



Morse, Brent (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Wednesday, February 13, 2019 2:55 PM
To: Holthaus, Kathryn; OLAW Division of Compliance Oversight (NIH/OD)
Cc: (b) (6) Moriarty, Allison P.; Mukundan, Srinivasan, Jr., M.D., Ph.D.;
Hoggatt, Amber
Subject: RE: Noncompliance Reports A4752-01

Thank you for these reports Ms. Holthaus. We will send official responses soon.

Best regards, Brent Morse

Brent C. Morse, DVM, DACLAM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health

Please note that this message and any of its attachments are intended for the named recipient(s) only and may contain confidential, protected or privileged information that should not be distributed to unauthorized individuals. If you have received this message in error, please contact the sender.

From: Holthaus, Kathryn [mailto:kholthaus@bwh.harvard.edu]
Sent: Wednesday, February 13, 2019 2:50 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: 'accredit@aaalac.org' <accredit@aaalac.org>; Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>; (b) (6)
(b) (6) Moriarty, Allison P. <AMORIARTY@BWH.HARVARD.EDU>; Mukundan,
Srinivasan, Jr., M.D., Ph.D. <smukundan@bwh.harvard.edu>; Hoggatt, Amber <ahoggatt1@bwh.harvard.edu>
Subject: Noncompliance Reports A4752-01

Dear Dr. Morse,

Thank you for speaking with me last week regarding three preliminary reports of noncompliance that were reviewed and discussed at a recent IACUC meeting at Brigham and Woman's Hospital, AWA# # D16-00941 (A4752-01). Please find the final reports attached to this email (in one PDF). Thank you in advance for your review of these incidents and please let us know if any further action is required at this time.

Best regards,
Kathryn

Kathryn A. Holthaus, M.S., M.A.

Director of Research Subjects Protection and Laboratory Safety Compliance
Research Administration and Compliance
Office: (b) (6)
kholthaus@bwh.harvard.edu
brighamandwomens.org



The information in this e-mail is intended only for the person to whom it is addressed. If you believe this e-mail was sent to you in error and the e-mail contains patient information, please contact the Partners Compliance HelpLine at <http://www.partners.org/complianceline> . If the e-mail was sent to you in error but does not contain patient information, please contact the sender and properly dispose of the e-mail.



Initial Report of Noncompliance

By: *zgm*

Date: *2/6/19*

Time: *2:00*

Name of Person reporting: *Kathryn Holtzhaus*

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: *Brigham + Womens Hosp.*

Assurance number: *A4752*

Did incident involve PHS funded activity? _____

Funding component: _____

Was funding component contacted (if necessary): _____

What happened? *Vet. Tech. found live rat in carcass refriger. Unidentified animal.*

Species involved: *Rat*

Personnel involved: *Unknown*

Dates and times:

Animal deaths: *Subsequently properly euthanized.*

Projected plan and schedule for correction/prevention (if known): _____

Notice sent to all "users"

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY

Case # _____