



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

October 3, 2019

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

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 September 30, 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 anesthetized mice were euthanized with non-pharmaceutical grade pentobarbital. No problems were reported with the euthanasia procedure.

The corrective actions consisted of stopping use of the drug and amending the protocol to describe use of a different euthanasia method.

Based on its assessment of this explanation, OLAW understands that measures have been implemented to correct and prevent recurrence of this problem. OLAW concurs with the actions taken by the institution to comply with the PHS Policy.

Sincerely,

(b) (6)

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

September 30, 2019

FINAL REPORT

Non-Compliance Report: Assurance **A4752-01**
Sponsor: 1R01AI134989-01AI and 5K08AI132723-03
Brigham and Women's Hospital IACUC

Dear Dr. Morse,

This letter serves as a report on an issue of non-compliance that was reviewed by the Brigham and Women's Hospital Institutional Animal Care and Use Committee. During a semi-annual IACUC inspection, it was discovered that non-USP grade pentobarbital had been used two times to euthanize mice which were already under anesthesia with ketamine/xylazine anesthesia. The lab members reported no observable adverse effects from the pentobarbital and the euthanasia went as expected. After review of the protocol, the IACUC suggested alternative euthanasia methods that maybe easier for the lab and suggested amending the protocol to remove the pentobarbital and using one of these alternatives for this study. Regardless, the lab immediately stopped their use of the non-USP grade pentobarbital so the IACUC considers this matter resolved.

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

Sincerely,

(b) (6)

Allison Moriarty
Vice President, Research Operations
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

Morse, Brent (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Monday, September 30, 2019 12:01 PM
To: Holthaus, Kathryn; OLAW Division of Compliance Oversight (NIH/OD)
Cc: (b) (6) Moriarty, Allison P.; Hoggatt, Amber; Mukundan, Srinivasan, Jr., M.D., Ph.D.
Subject: RE: Noncompliance Reports A4752-01

Thank you for providing 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

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From: Holthaus, Kathryn [mailto:kholthaus@bwh.harvard.edu]
Sent: Monday, September 30, 2019 11:39 AM
To: Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>; OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: (b) (6) Moriarty, Allison P. <AMORIARTY@BWH.HARVARD.EDU>; Hoggatt, Amber <ahoggatt1@bwh.harvard.edu>; Mukundan, Srinivasan, Jr., M.D., Ph.D. <smukundan@bwh.harvard.edu>; 'accredit@aaalac.org' <accredit@aaalac.org>
Subject: Noncompliance Reports A4752-01

Dear Dr. Morse,
Please find attached to this email, two reports of noncompliance that were reviewed and discussed at a recent meeting of the Brigham and Woman's Hospital IACUC, AWA# # D16-00941 (A4752-01). Thank you in advance for your review of these incidents and please let us know if any further action is required at this time.
Kind 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)
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