



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

December 1, 2020

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

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 November 24, 2020 letter reporting five serious deviations from the provisions of the *Guide for the Care and Use of Laboratory Animals* at Brown University. According to the information provided, OLAW understands the following about the incidents and the corresponding corrective actions:

1. A mouse died due to lack of food. Although the log sheet had been signed by the animal caretaker, food had not been provided.
2. A mouse died due to lack of water. The animal caretaker had not provided a water bottle.
3. Seven mice escaped from their cage due to a missing grommet, four mice were recovered and placed in a cage with food and water. Three mice were never found and one was subsequently euthanized.
4. Two weanling mouse were found moribund after not receiving food. The log sheet had been signed by the animal caretaker, but food had not been provided. Food had not been provided by the laboratory staff, the problem was not noted by animal care staff, and the mice were subsequently euthanized.
5. One mouse was found in poor condition due to food not being provided upon separation by the laboratory staff. The problem was not identified during daily health checks by the animal care staff.

The corrective actions taken with the animal care staff consisted of the following:

1. All animal care staff was counseled on the incidents and disciplinary action was taken.
2. All animal care staff was retrained on cage changing, daily observations, and the requirement for prompt reporting of animals without food/water.
3. Food/water check cards were revised to reflect actual approved restrictions.
4. Cages without grommets were obtained for those not on the automatic watering system.
5. Animal care staff was retrained on checking for cage defects.

6. Old cages are being replaced as necessary.
7. Animal care staff was retrained on handling escaped animals.
8. Laboratory staff was counseled on ensuring that food/water is provided for animals being weaned or separated.

Based on its assessment of these explanations, OLAW understands that measures have been implemented with both the animal care and research staff to ensure that all animals have access to food/water. Although OLAW concurs with the actions taken by the institution to comply with the PHS Policy on Humane Care and Use of Laboratory Animals we will monitor future Brown University noncompliance reports to see if this pattern of programmatic noncompliance continues. At this time we will not be placing the institution on an enhanced reporting schedule as the proposed corrective actions may be sufficient to prevent future occurrences. However, ongoing instances of animal deaths due to lack of food/water constitute a serious animal welfare concern and may require additional institutional program oversight by this Office. Thank you for informing OLAW about this matter.

Sincerely,

 (b) (6)

Axel Wolff, M.S., D.V.M.
Deputy Director
Office of Laboratory Animal Welfare

cc: IACUC Chair



BROWN

November 24, 2020

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 September 6, 2020, a Center for Animal Resources and Education (CARE) supervisor found a deceased mouse within a cage in the animal facility. Upon inspection, it was noted that there was no food within the cage. The food and water sign off card was signed by the CARE Animal Care Technician (ACT) who performed husbandry in the room from September 1-5, 2020. There was an external water bottle present on the cage. After checking with the lab, it was apparent that the lack of food was an error on the part of the CARE ACT.
- On September 28, 2020 a CARE Vet Tech found a dead mouse in the animal facility. Upon inspection, it was the only mouse in the cage and there was food; however, no water bottle was present. A member of the lab provided information upon inquiry that the mouse was born on August 25, 2020 and the litter was weaned by the lab member on September 15, 2020. After verifying with the lab, it was apparent that the cage with no water bottle was an error on the part of the CARE ACT.
- On September 30, 2020 – A researcher notified CARE staff that they had found a cage with a grommet missing in the animal facility and that seven of the 10 mice were missing from the cage. Later on the same day, three of the seven mice were found and were placed within a new cage with food and water. It was noted that four pups were still missing at this time. The following day, CARE staff found a fourth pup which was placed in an isolated cage. The cage had two pellets of food and gel on the floor of the cage and a bottle of water. Later in the evening, a researcher from the lab notified CARE that they had noticed the cage with the soft gel had a water bottle but no food, and that the mouse looked moribund, and so the researcher euthanized the mouse. It was also

noted that three of the seven mice were never found as a result of the escape from the grommet failure.

- On September 30, 2020, a CARE Vet tech found two weanlings in a cage that appeared to be moribund, and no food or diet gel was present in the cage. After further investigation, it was found that the lab weaned the animals on September 28, 2020 and initially failed to provide food in the cage. CARE ACT signed off on room checks through September 29, 2020 finding no cages without food. It was ultimately decided that the CARE ACT should have noticed the weanling cage with no food or diet gel. The mice did not recover and were ultimately euthanized by the CARE Vet Tech on September 30, 2020.
- On October 18, 2020, a CARE ACT found one mouse without food in a cage and the mouse appeared to be very weak. The CARE ACT contacted the veterinarian and after consultation, the CARE ACT euthanized the mouse. Upon further investigation, it was found that the PI's lab had separated the mice into cages upon arrival into the facility and it was likely that the lab forgot to place food in one of the cages. The CARE staff had three different CARE ACTs check the room between the dates October 13 – October 18. Ultimately it was discussed that the CARE ACTs should have caught this cage upon room check.

The IACUC discussed the incidents of animal welfare concern related to these PHS funded projects during its convened meeting November 6, 2020. It was determined that CARE staff were responsible for all of the described incidents and that each 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 action has taken, or will take, place:

- The incidents were reviewed with all CARE staff involved with appropriate disciplinary action taking place.
- CARE retrained all staff on cage change and cage observation requirements and on the protocol for reporting animals found without food or water. This retraining was done on 11/19/2020.
- CARE is working with labs to revise food and water check cards to ensure there is no confusion with which animals are food and/or water restricted.
- CARE ordered cages without grommets for all cages that are not on the automatic watering system.
- CARE Staff was retrained on how to check cages for defects and will be reminded of what to look for when inspecting cages.
- Additionally, CARE is implementing a process to inspect and replace, as necessary, all Thoren cages within the animal facility as they are original to the facility and approximately 14 years old.
- All CARE ACTs will be retrained on how to handle animals that are found loose within the facility to ensure that the biosecurity of the barrier is maintained.
- In situations where the lab separated or weaned animals without placing food and/or water, the lab member was contacted and reminded of proper weaning and/or cage splitting protocols.

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 [REDACTED] (b) (6)

[REDACTED] (b) (6)

Thank you for your consideration of this matter.

Sincerely,

[REDACTED] (b) (6)

Jill C. Pipher, Ph.D.
Vice President for Research, Institutional Official
Brown University

cc: Diane Hoffman-Kim, PhD, IACUC Chair
[REDACTED] (b) (6)
Keri Godin, Senior Director, Office of Research Integrity
Lara Helwig, DVM, Attending Veterinarian
AAALACi

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Tuesday, November 24, 2020 8:35 AM
To: IACUC
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Event Report- 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: Tuesday, November 24, 2020 8:33 AM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Jill Pipher <jill_pipher@brown.edu>, (b) (6) Keri Godin <keri_godin@brown.edu>; Lara Helwig <lara_helwig@brown.edu>; Diane Hoffman-Kim <Diane_Hoffman-Kim@brown.edu>; accredit@aaalac.org
Subject: Event Report- Assurance A3284-01

Good morning,

Please find attached a recent incident of noncompliance discussed by the Brown University IACUC during its November 6, 2020 convened meeting.

Please let me know if you have any questions.

Sincerely,

(b) (6)

Helpful Links:

- Brown IACUC website: <http://www.brown.edu/research/RPO/IACUC>
- InfoEd: infoed.brown.edu

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