



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 24, 2021

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

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 18, 2021 letter reporting a serious deviation from the provisions of the *Guide for the Care and Use of Laboratory Animals* at Brown University. According to the information provided, OLAW understands that five mice died, two were moribund and required euthanasia, and others were hunched due to lack of access to water. The root cause has not yet been determined but it is possible that the automatic watering system's valves failed. The animal caretaker responsible failed to promptly identify the problem.

The immediate action taken consisted of providing the surviving mice with water bottles and gel cups, and the animals recovered. The rack involved was examined by a factory representative but no definitive cause was identified. No alarms had been registered and the twice daily room flush occurred as programmed. Water valves will be sent out for analysis, the responsible animal caretaker was disciplined and retrained, all caretakers will be retrained in the proper conduct of daily health checks, and supervisors are performing redundant animal room checks.

Based on its assessment of this explanation, OLAW understands that measures are underway to correct and prevent recurrence of this problem. OLAW concurs with the actions taken by the institution to comply with the PHS Policy on Humane Care and Use of Laboratory Animals. Although we are closing this case, please provide any pertinent updates such as the result of the valve analysis. 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

March 18, 2021

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 February 11, 2021 an Animal Care Technician found a total of 5 deceased mice in 6 cages that were housed on a rack with an automatic watering system (AWS). Two additional mice in one of the cages were found moribund and were humanely euthanized. Other mice on the rack were found slightly hunched and/or with rough hair coats, suggesting dehydration. Upon further examination, the carcasses from at least two of the cages were partially cannibalized suggesting that the animals had likely been without water for a period of greater than 24 hours. The remaining live mice were provided water bottles and gel cups and have recovered.

All water valves were fully functional at the time the mice were found but will be sent out for analysis. Subsequent to this event, on February 16, 2021, the Avidity AWS representative performed a check on the rack in question as well as the entire Avidity AWS. The representative could find no explanation for the failure involving these cages. Additionally, a review of system alarms from February 1-16, 2021 did not reveal any alarms for this room confirming that the twice daily room flushes were performed as programmed.

The IACUC discussed the incidents of animal welfare concern related to these mice which were on PHS funded projects. The committee determined that the incident described which 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:

- While the cause of the lack of water was not identified, it is clear that the CARE staff member involved failed to recognize that the animals were unable to access water in a timely manner. This individual was disciplined and has been retrained on proper animal observation procedures
- The entire CARE staff is being retrained with respect to the expectations for daily animal health monitoring.
- Supervisors are performing additional animal health monitoring checks and quality control checks in rooms at this facility and CARE will continue to work with Avidity to identify the root cause for the failure.
- We are awaiting the results of the water valve analysis.

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)

(b) (6)

Thank you for your consideration of this matter.

Sincerely,

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]**

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, March 19, 2021 7:29 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:** Thursday, March 18, 2021 2:28 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>; Jill Pipher <jill\_pipher@brown.edu>; Keri Godin <keri\_godin@brown.edu>; Lara Helwig <lara\_helwig@brown.edu>; (b) (6)  
(b) (6) Diane Hoffman-Kim <Diane\_Hoffman-Kim@brown.edu>; accredit@aaalac.org  
**Subject:** Event Report- Assurance A3284-01

Good afternoon,

Please find attached a recent incident of noncompliance discussed by the Brown University IACUC during its March 5, 2021 convened meeting.

Please let us know if you have any questions.

Thanks,

(b) (6)

**Helpful Links:**

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

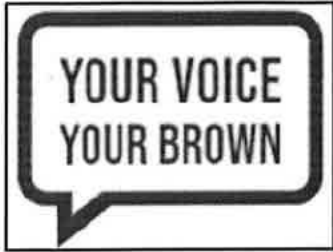
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