



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) 480-3387

October 5, 2020

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

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 August 28, 2020 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: unapproved animal housing. The final report states on July 13, 2020 a principal investigator (PI) was informed by Environmental Health and Safety (EH&S) that their lab needed to be vacated for 3 days due to a positive SARS-COV-2 test. At that time, lab members were weighing and inspecting mice post-operatively. It is stated animals were alert and returned to their cages, and lab members vacated the room for 3d as instructed. A breakdown in communication occurred between EH&S, Human Resources, veterinary staff, the PI and lab members. As a result, the animals were left in an unapproved housing area until they could be returned to their housing room on July 16, 2020. The IACUC discussed the incident at the convened meeting on August 7, 2020 and understood the following corrective actions were implemented or to take place:

- The animals were returned to their appropriate housing location.
- Communication was sent to all satellite facility managers and PIs without personnel backup that required creating an additional animal care oversight plan with the Center for Animal Resources and Education (CARE) veterinary staff if a positive SARS-COV-2 test were to occur requiring lab spaces to be vacated. All applicable plans were communicated to the Attending Veterinarian and approved.
- The above communication will be sent to every PI conducting live vertebrate animal work at the university.

It is noted that this research is supported by NSF funds. 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.

Page 2 – Dr. Pipher  
October 5, 2020  
OLAW Case A3284-2F

Sincerely,  
**Jacquelyn T.  
Tubbs -S**  
Digitally signed by  
Jacquelyn T. Tubbs -S  
Date: 2020.10.05  
12:00:05 -04'00'  
Jacquelyn T. Tubbs, DVM  
Animal Welfare Program Specialist  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare

cc: IACUC Contact



BROWN

August 28, 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: Noncompliance Report, Assurance D16-00183 (A3284-01)  
National Science Foundation Award (DBI - 1707352).

Dear Dr. Morse:

The Brown University IACUC, through the Institutional Official (Jill C. Pipher, PhD), 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 July 13, 2020 the PI learned from Environmental Health and Safety (EH&S) that their lab would need to be vacated for three days as a result of a positive SARS-COV2 test. At this time, members of the PI's lab were in the process of weighing and inspecting four mice post-operatively. After the animals were alert and returned to their cages, the lab members vacated the room for three days as directed.

In an effort to figure out what to do with the animals, there was a breakdown in communication between the PI and lab members, Human Resources, Environmental Health and Safety and the veterinary staff that resulted in the animals being left in an unapproved housing area until they could be returned to their housing room on July 16, 2020.

During the three days, the four mice had access to ad libitum food and water and were observed as doing well by the Veterinarian with no observable animal welfare concerns.

The IACUC discussed this issue of noncompliance at its convened meeting on August 7, 2020, and understands that the following corrective actions have taken or will take place:

- The mice were brought back to their appropriate housing location.
- Communication was sent to all satellite facility managers and PIs without personnel backup that required creating an additional animal care oversight plan with the Center for Animal Resources and Education (CARE) veterinary staff if there were to be a positive SARS-COV2 test requiring lab spaces be vacated. All applicable plans were communicated to the Attending Veterinarian and approved.
- Additionally, this communication will be sent to every principal investigator conducting live vertebrate animal work at Brown.

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)

Thank you for your consideration of this matter.

Sincerely,

(b) (6)

Jill C. Pipher, PhD  
Vice President for Research, Institutional Official  
Brown University, Box 1937

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

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Tuesday, September 1, 2020 10:05 AM  
**To:** IACUC  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Event Report - Assurance D16-00183

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:** Friday, August 28, 2020 1:15 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** Event Report - Assurance D16-00183

Hello,

Please find attached a recent incident of non compliance discussed by the Brown University IACUC during its August 7, 2020 convened meeting. Please let me know if you have any questions.

Sincerely,

(b) (6)

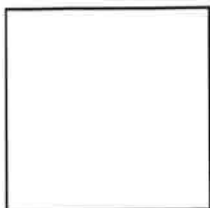


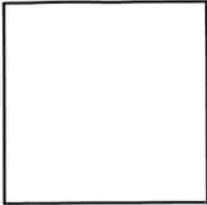
**Helpful Links:**

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

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Brown Ethics and Compliance Reporting System is an Anonymous and Confidential Hotline to report compliance issues and unethical activity. The hotline is managed by a third party and all reports are given careful attention. Reporting a concern will not jeopardize your employment and is a service to "Your Brown." Make "Your Voice" heard, call 877-318-9184 or [click here](#) to report.