

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

June 26, 2020

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

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 June 22, 2020 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at 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: severe overcrowding of a mouse cage. The final report states on May 28, 2020, Center for Animal Resources and Education (CARE) personnel observed severe over-crowding of mice in a cage. The cage contained 24 weaned mice and two newborn litters. The IACUC considered this a significant repeat non-compliance within the lab. The incident was discussed at the June 5, 2020 meeting and determined to be a significant repeat deficiency within the lab and considered reportable. The committee also determined this matter was a violation of its approved Policy on "Mouse Housing Density and Colony Management." The corrective actions included the following:

- Implementation of a color-coded sticker system within the lab to easily identify personnel responsible for cages.
- Institution of daily overcrowding checks by a designated lab member.
- Copying of the principal investigator (PI) on all emails from this designated lab member regarding births and weanlings.
- PI discussion of the incident with the responsible lab member indicating that future infractions would result in loss of access to the rodent colony.
- IACUC invitation to the PI to seek additional training for the lab in breeding and colony management.
- IACUC requirement that PI provide a report to the committee at the end of July and October 2020 detailing:
  - Whether or not more overcrowding incidents have occurred.
  - How often lab members are going in to check on animals.
  - The effectiveness of the changes that were implemented in response to this incident.

It is noted that these animals were not supported by PHS 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.

Sincerely,

(b) (6)

Jacquelyn T. Tubbs, DVM  
Animal Welfare Program Specialist  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare

cc: IACUC Contact



June 22, 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 IACUC, through the Institutional Official (Jill C. Pipher, Ph.D.), is writing to provide OLAW with a report of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals ("PHS Policy"):

On May 28, 2020, Center for Animal Resources and Education (CARE) personnel observed severe over-crowding in a cage. A total of 24 weaned mice and two newborn litters were observed in the cage.

This non-compliance incident occurred within a mouse cage that was not funded by PHS funds. The IACUC deemed this a significant repeat non-compliance within the lab occurring on a protocol funded by the following award: **R01NS095908**.

The IACUC discussed the repeat incident of overcrowded cages during its convened meeting on June 5, 2020 and found this to be a significant repeat deficiency within the lab that is reportable under 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 IACUC also finds this incident in violation of its approved *Policy on Mouse Housing Density and Colony Management*. The cage was part of work supported by internal funds.

The following corrective action has taken, or will take, place:

- Implementation of a color-coded sticker system within the lab to easily identify personnel responsible for cages,
- Institution of daily overcrowding checks by a designated lab member,
- Copying of the PI on all emails from this designated lab member regarding births and weanings,

- PI discussion of the incident with the responsible lab member indicating that future infractions would result in loss of access to the rodent colony.
- IACUC invitation to the PI to seek additional training for the lab in breeding and colony management.
- IACUC requirement that PI provide a report to the committee at the end of July and October 2020 detailing:
  - Whether or not more overcrowding incidents have occurred,
  - How often lab members are going in to check on animals,
  - The effectiveness of the changes that you implemented in response to this incident.

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)

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, Box 1937

cc: Richard Freiman, PhD, IACUC Vice Chair

Lara Helwig, DVM, Attending Veterinarian

[REDACTED] (b) (6)

Keri Godin, Senior Director, Office of Research Integrity  
AAALACi

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Wednesday, June 24, 2020 7:53 AM  
**To:** IACUC  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Event Report- Assurance D16-00183 (A3284-01)

Thank you for this report, (b) (6) We will respond soon.

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

**From:** (b) (6) On Behalf Of IACUC  
**Sent:** Monday, June 22, 2020 4:15 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>; Jill Pipher <jill\_pipher@brown.edu>; Lara Helwig <lara\_helwig@brown.edu>; (b) (6) Keri Godin <keri\_godin@brown.edu>; accredit@aaalac.org; Richard Freiman <Richard\_Freiman@brown.edu>  
**Subject:** Event Report- Assurance D16-00183 (A3284-01)

Hello,

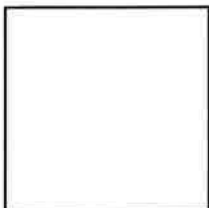
Please find attached a recent incident of non compliance discussed by the Brown University IACUC during its June 6, 2020 convened meeting. Please let me know if you have any questions.

Sincerely,

(b) (6)

### Helpful Links:

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



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.