



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

July 6, 2021

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

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 29, 2021 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: conditions that jeopardized the well-being of animals and resulted in harm to animals. The final report states on May 3, 2021, a lab member preparing for a surgical procedure, placed a pacu fish in a container of buffered MS222 that also included an aquarium water heater. It is stated the heater was provided after the lab determined additional preparation for surgery was needed. Following the procedure, a thermal burn was observed on the fish. The veterinary team was notified, and the fish was provided treatment and fully recovered, per the report.

The matter was discussed at the June 4, 2021 convened meeting of the IACUC. The following corrective actions were determined in response to the incident:

- CARE will provide retraining to the individuals involved on topics of anesthesia safety and surgical preparation. The expectation that preparations will be completed prior to anesthesia will be communicated as part of the training.
- Should an unexpected event occur that requires holding of a fish prior to surgery, the lab will remove the aquarium heater prior to placing fish into the bucket.

It is noted that this project 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.

Sincerely,

Jacquelyn T.

Tubbs -S

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

Digitally signed by Jacquelyn T.  
Tubbs -S  
Date: 2021.07.06 13:38:20 -04'00'

cc: IACUC Contact



# BROWN

June 29, 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  
NSF GR5260181

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 May 3, 2021, a member of the PI's lab was preparing for a surgical procedure and placed a pacu fish into a bucket of buffered MS222 solution with an aquarium water heater in it. The heater had been placed into the solution after the lab realized they had some additional surgery preparation to do. After the procedure, a thermal burn was discovered on the fish and was determined to be the result of the fish brushing up against the heater. The veterinary team was contacted and the fish was placed on a treatment plan where it recovered fully.

The IACUC discussed the incident of animal welfare concern at its June 4, 2021 convened meeting and determined that the lab was responsible for the incident described which meets the criteria for reporting per the NIH NOT-OD-05-034, "*Guidance on Prompt Reporting.*"

The following corrective actions have taken, or will take, place:

- CARE will provide retraining to the individuals involved on topics of anesthesia safety and surgical preparation. The expectation that preparations will be complete prior to anesthesia will be communicated as part of the training.

- Should an unexpected event occur that requires holding of a fish prior to surgery, the lab will remove the aquarium heater prior to placing the fish into the bucket

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, Director of CARE, Attending Veterinarian  
AAALACi

## Walker, Keri (NIH/OD) [E]

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Wednesday, June 30, 2021 8:14 AM  
**To:** IACUC  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Report of noncompliance, Assurance #A3284-01 NSF GR5260181

Good morning,

Thank you for this report. We will send a response soon.

Best,  
Keri

*Keri Walker  
Program Analyst  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
6700B Rockledge Dr., Suite 2500  
Bethesda, MD 20892  
301-435-2390  
[keri.walker@nih.gov](mailto:keri.walker@nih.gov)*

**From:** (b) (6) On Behalf Of IACUC  
**Sent:** Tuesday, June 29, 2021 8:00 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <[olawdco@od.nih.gov](mailto:olawdco@od.nih.gov)>; Diane Hoffman-Kim <[Diane\\_Hoffman-\(b\)\(6\)@brown.edu](mailto:Diane_Hoffman-(b)(6)@brown.edu)>; Keri Godin <[keri\\_godin@brown.edu](mailto:keri_godin@brown.edu)> (b) (6)  
[accredit@aaalac.org](mailto:accredit@aaalac.org); Lara Helwig <[lara\\_helwig@brown.edu](mailto:lara_helwig@brown.edu)>  
**Subject:** Report of noncompliance, Assurance #A3284-01 NSF GR5260181

Hello,

Please see the attached report for an incident involving Dr. Brainerd's project.

Thank you!

(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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*Personalized sessions offered every Tuesday from 2-4pm and every Friday from 9-11am at the South Street Landing.*



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.