



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

May 9, 2019

Re: Animal Welfare Assurance
#A3281-01 [OLAW Case 2E]

Dr. P. Srirama Rao
Vice President for Research and Innovation
Virginia Commonwealth University
Biotech One, Suite 3000
PO Box 980568
Richmond, VA 23298-0568

Dear Dr. Rao,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your final report, dated April 16, 2019, of an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Virginia Commonwealth University. Initial notification was provided by phone on April 12th. According to the information provided, OLAW understands that on March 14th three cages of mice were found with empty Hydropac water pouches. Two cages contained nine dead mice. Five mice in the third cage recovered with supportive treatment. It was unclear why only these three cages in the room were affected but the caretaker failed to detect the low water issue. It was stated that the related animal activity was not PHS funded.

Corrective actions included the counseling and retraining of the responsible animal caretaker and to address the issue program-wide, DAR staff with animal husbandry responsibilities will be apprised of this incident and retrained to increase awareness regarding food and water in each cage.

Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate this incident, provide corrective measures, and prevent recurrence. OLAW concurs that the incident warranted reporting. Although this activity was not PHS funded, the application of the standards of the PHS Policy across the animal care and use program reduces any potential appearance of a double standard. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

(b) (6)

Brent C. Morse, DVM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC Contact

(b) (6)

A3281-2E



VCU

Office of Research and Innovation

Office of Research and Innovation
Virginia Commonwealth University

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psrao@vcu.edu

P. Srirama Rao, PhD
Vice President for Research and Innovation
Professor of Microbiology and Immunology,
School of Medicine

April 16, 2019

Brent Morse, D.V.M., Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health
6700B Rockledge Drive
Suite 2500, MSC 6910
Bethesda, MD 20892
(301) 496-7163

VCU Animal Welfare Assurance number D16-00180 (A3281-01)

Dear Dr. Morse:

Virginia Commonwealth University, in accordance with Assurance D16-00180 (A3281-01) and PHS Policy IV.F.3., provides this report of noncompliance regarding the death of 9 mice due to lack of water. This incident was reported to you on April 12, 2019 via a telephone call by Ms. Amy Chuang, Director of Animal Care and Use Program, Office of Research and Innovation.

Description of Incident:

On the afternoon of Thursday, March 14th, the investigator's staff found three cages in which the Hydropac water pouch appeared to be empty. All animals from two cages were dead (one cage of five animals and the other cage of four animals). Five animals in the third cage were given access to a DietGel and HydroGel and appeared to be fully recovered the next day. The veterinarian was in the vivarium at the time, and he and the vivarium manager evaluated the cages with the investigator's staff. The necropsy report indicated that the animals died from dehydration. Upon investigation, the majority of the Hydropac water pouches appeared to be at or just below half-full, so it is unclear why these few cages were completely out of water. However, the primary animal caretaker did not detect the water issue with these cages during routine observations for a number of days, resulting in the deaths of the animals.

Corrective action plan:

- (1) The DAR primary animal caretaker involved in this incident received individual counseling and retraining on proper health observation procedure, which emphasized the importance of verifying appropriate food and water levels and overall animal health. Documentation of this counseling and retraining was provided to the Director of Animal Care and Use Program and also recorded in DAR's training file on April 16, 2019.
- (2) In order to minimize the possibility of a similar incident occurring in the future, at the next DAR staff meeting all DAR staff with animal husbandry responsibilities will be apprised of this incident

and retrained in order to increase awareness regarding verification of food and water in each cage. Documentation and description of this meeting received during the staff meeting will be recorded and maintained in DAR's training folder.

The animals and protocol involved are not PHS funded.

We regret that this incident occurred. Following our detailed investigation, we have deployed specific corrective actions to enhance our program and to minimize future occurrences. The IACUC will be advised of the above corrective actions at their next full committee meeting.

We appreciate your consideration of VCU's efforts to minimize future occurrences. VCU remains committed to animal welfare and recognizes its ethical responsibilities in ensuring the welfare of research animals and complying with the *PHS Policy* on the Humane Care and Use of Laboratory Animals.

Sincerely,

(b) (6)

A rectangular grey box redacting the signature of the sender.

P. Srirama Rao, PhD
Vice President for Research and Innovation
Professor of Microbiology and Immunology, School of Medicine

Morse, Brent (NIH/OD) [E]

From: Morse, Brent (NIH/OD) [E]
Sent: Wednesday, April 17, 2019 8:57 AM
To: Kuei-Lan Chuang; OLAW Division of Compliance Oversight (NIH/OD)
Cc: Srirama Rao; (b) (6)
Subject: RE: Follow-up letter (VCU Assurance# D16-00180/A3281-01)

Thank you for this report Amy. We will send an official response soon.

Best regards, Brent Morse

Brent C. Morse, DVM, DACLAM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health

Please note that this message and any of its attachments are intended for the named recipient(s) only and may contain confidential, protected or privileged information that should not be distributed to unauthorized individuals. If you have received this message in error, please contact the sender.

From: Kuei-Lan Chuang [mailto:kchuang@vcu.edu]
Sent: Tuesday, April 16, 2019 8:37 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>; Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>
Cc: Srirama Rao <psrao@vcu.edu>; (b) (6)
Subject: Follow-up letter (VCU Assurance# D16-00180/A3281-01)

Dear Dr. Morse,

Attached please find the follow-up letter signed by Dr. Rao, VCU Institutional Official. The incident was reported by phone on April 12. The written report includes a detailed explanation of the incident and actions taken by VCU IACUC.

We have reviewed this incident thoroughly and deployed specific corrective actions designed to enhance our animal program and to prevent future occurrences. We appreciate your consideration and VCU recognizes its responsibilities to comply with the Public Health Service Policy on the Humane Care and Use of Laboratory Animals and the Guide, and also remains committed to animal welfare.

Should you have any questions regarding this matter, please do not hesitate to contact me at (b) (6) or email to: kchuang@vcu.edu.

Best Regards,

Amy Chuang

--

Amy

Amy Chuang, M.S., RQAP-GLP, CPIA
Director for the Animal Care and Use Program (ACUP)
Office of Research and Innovation
Virginia Commonwealth University
Box 980568
800 E. Leigh St., (b) (4)
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Animal Research website: <https://research.vcu.edu/secure/acup/index.htm>
Animal Care and Use Program Blog: <http://wp.vcu.edu/acup/>



Initial Report of Noncompliance

By: *[Signature]*

Date: *4/16/19*

Time: *Voicemail from 4/12*

Name of Person reporting: *Amy Kuanga*
Telephone #: (b) (6)
Fax #: *[Redacted]*
Email: *[Redacted]*

Name of Institution: *VCU*
Assurance number: *A3281*

Did incident involve PHS funded activity? _____
Funding component: _____
Was funding component contacted (if necessary): _____

What happened? *3 cages w/ empty water pouches. 2 cages w/ 9 dead mice. One cage of mice recovered.*

Species involved: *Mouse*
Personnel involved: *Am. care*
Dates and times: _____
Animal deaths: *Yes*

Projected plan and schedule for correction/prevention (if known): _____
Counseling + retraining

Projected submission to OLAW of final report from Institutional Official: _____

OFFICE USE ONLY
Case # _____