



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

August 7, 2019

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

Dr. P. Srirama Rao
Vice President for Research and Innovation
Virginia Commonwealth University
Biotech One, (b) (4)
PO Box 980568
Richmond, VA 23298-0568

Dear Dr. Rao,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your August 5, 2019 letter reporting two serious deviations from the provisions of the *Guide for the Care and Use of Laboratory Animals* at Virginia Commonwealth University, following up on an initial telephone report on July 18, 2019. According to the information provided, OLAW understands the following about the incidents and the corresponding corrective actions:

- 1) Four mice died of starvation because they could not access the food which had been put in the water pouch space rather than the food hopper. The problem was not noted by animal care staff during daily health checks.
- 2) Two mice died after not receiving food or water. The food was in the water pouch space and the water bottle lixit was facing outside of the cage which made both food and water inaccessible. The problem was not noted by animal care staff during daily health checks.

Corrective actions: The animal care staff was retrained and instructed to correct and report improper placement of food/water. All animal users of these types of cages were informed how to correctly place food/water and explanatory signs with text and pictures have been placed in the animal rooms.

Based on its assessment of this explanation, OLAW understands that measures have been implemented to correct and to reduce the likelihood of a recurrence of these problems. OLAW concurs with the actions taken by the institution to comply with the PHS Policy on Humane Care and Use of Laboratory Animals.

Sincerely,

(b) (6)

Axel Wolff, M.S., D.V.M.
Deputy Director
Office of Laboratory Animal Welfare

cc: IACUC Chair
Director for the Animal Care and Use Program



VCU

Office of Research and Innovation

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

August 5, 2019

Axel V. Wolff, M.S., D.V.M.,
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. Wolff:

Virginia Commonwealth University, in accordance with Assurance D16-00180 (A3281-01) and PHS Policy IV.F.3., provides this report of noncompliance regarding two incidents described below. Both incidents involved the same issue due to putting food in the wrong hopper. The first incident involved lack of food resulting in the deaths of four mice. The second incident involved lack of food and water resulting in the deaths of two mice. Both incidents were reported to you on July 18, 2019 via telephone call by Ms. Amy Chuang, Director of Animal Care and Use Program, Office of Research and Innovation.

Description of Incident #1:

On Monday, July 8th, a Division of Animal Resources (DAR) animal caretaker reported that four female mice were found dead in a cage. The food hopper was empty; instead, food had been added to the Hydropac water pouch side of the hopper. This side has a solid bottom and only has a small opening through which the water lixit protrudes, so the animals were unable to access the food. A full external water bottle was present and correctly inserted into the cage. The mice had been weaned on July 1st. Although it is not clear when the food was incorrectly put into the hopper or by whom, the DAR animal caretaker did not recognize the issue during weekend health observations, resulting in the deaths of the animals.

Description of Incident #2:

During the morning health observation on Wednesday, July 10th, two-single-housed male mice were found dead. The food hopper for each cage was empty; instead, food had been added to the Hydropac water pouch side of the hopper. This side has a solid bottom and only has a small opening through which the water lixit protrudes, so the animals were not able to access the food. The external water bottle lixits should have been pushed through the slot into the cage, but instead, the bottles had been turned around so that the lixit was outside of the cage. As a result, the animals could not reach the food

and water. These animals had undergone a procedure on July 2nd, so the research personnel used cages premade to house animals after the procedure. The food was likely misplaced when these cages were initially prepared. Two mice were checked by lab personnel and appeared to be fine each day between July 3rd and 5th. However, they are not sure whether they left the water bottle out of the cage at their last check. Although it is not clear when these cage conditions originated, DAR staff failed to recognize the issue during their daily health observations.

Corrective action plan:

- (1) The DAR husbandry staff (involved in the above incidents and others handling this type of cage in this building) received training on correct food/water placement. Food in this type of cage should always be on the left side of the cage. If the food is on the other side of the hopper, DAR staff should correct the issue and report it on their daily observation forms so that DAR management can remind research staff of proper food placement. Documentation of this training has been provided to the Director of Animal Care and Use Program and recorded in the DAR's training file.
- (2) An email with instructions and pictures about correct food/water bottle placement has been sent to every animal user in rooms containing this cage style to emphasize proper food/water bottle placement.
- (3) Signage with the same language and pictures has been posted in each animal room containing this cage style.

We regret that these incidents 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)



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

Wolff, Axel (NIH/OD) [E]

From: Wolff, Axel (NIH/OD) [E]
Sent: Wednesday, August 7, 2019 6:14 AM
To: Kuei-Lan Chuang
Subject: RE: Two Follow-up letters (VCU Assurance# D16-00180/A3281-01)

Thanks for these letters Amy. I'll send responses soon.
Axel

From: Kuei-Lan Chuang <kchuang@vcu.edu>
Sent: Monday, August 5, 2019 4:08 PM
To: Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>; OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Srirama Rao <psrao@vcu.edu>; (b) (6)
Subject: Two Follow-up letters (VCU Assurance# D16-00180/A3281-01)

Dear Dr. Wolff,

Attached please find two follow-up letters signed by Dr. Rao, VCU Institutional Official. These three incidents were reported to you by phone on July 18. The written report includes a detailed explanation of these incidents and actions taken by VCU IACUC.

We have reviewed these incidents 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,

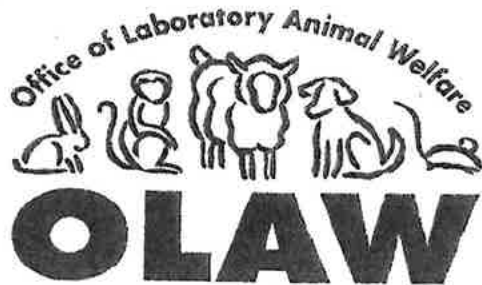
Amy Chuang

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Amy

Amy Chuang, M.S., RQAP-GLP, CPIA
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Animal Research website: <https://research.vcu.edu/secure/acup/index.htm>



Initial Report of Noncompliance

By: aw

Date: 7/18/19

Time: 9:30

Name of Person reporting: AMY CHEUNG

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: VIRGINIA COMMONWEALTH U.

Assurance number: A3281

Did incident involve PHS funded activity? _____

Funding component: _____

Was funding component contacted (if necessary): _____

What happened?

1) 4 weanling mice died. Food in wrong place (water bottle slot)
Animal caretaker didn't notice

2) 2 mice dead because food in wrong place

Species involved: Mice

Personnel involved:

Dates and times:

Animal deaths:

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

Send out picture of correct placement of food/water
Counsel caretakers

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY

Case # _____