



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 2I]

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 a serious deviation 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 that two mice died and two were lethargic due to not receiving water. The investigator had brought the cage to the laboratory for training but forgot to return it to the vivarium.

The corrective actions consisted of euthanizing the two surviving mice and counseling the investigator and staff to never leave animals in the laboratory without food or water and to return cages to the vivarium on the same day.

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 this problem. OLAW concurs with the actions taken by the institution to comply with the PHS Policy.

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

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

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 lack of water resulting in the deaths of two mice plus two mice that were subsequently euthanized. This incident was 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:

On Monday, July 1st the Division of Animal Resources (DAR) animal caretaker reported that the investigative staff brought a cage back to the vivarium containing two dead mice and two lethargic mice. The water bottle was empty. After discussing with the investigative staff, the remaining two mice were euthanized. The investigator was contacted and she admitted that it was her mistake. She brought the cage of mice to the lab for technique practice on Friday, June 26th but failed to return the cage to the vivarium on the same day before she left the lab, resulting in the deaths of the animals.

Corrective action plan:

- (1) The investigator involved in this incident has been counseled to ensure animals must not be left in the lab without appropriate food and water. Documentation of this counseling was recorded and maintained in the compliance folder.
- (2) The investigator has talked to her staff to ensure cages containing animals are brought back to the animal vivarium on the same day before leaving the lab.

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

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
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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kchuang@vcu.edu

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) 2 dead, 2 moribund from lack of food/water for training mice

Species involved: *Mice*
Personnel involved:
Dates and times:
Animal deaths:

Projected plan and schedule for correction/prevention (if known): _____
1) Enrollize. Counsel PI who forget to return to animal room

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY
Case # _____