



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

March 10, 2020

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

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 March 5, 2020 letter reporting a serious deviation from the provisions of the *Guide for the Care and Use of Laboratory Animals* at Virginia Commonwealth University (VCU), following up on an initial telephone report on February 12, 2020. According to the information provided, OLAW understands that four mice died due to lack of water. The problem had not been identified during daily health checks.

The corrective actions consisted of counseling and retraining the animal caretaker responsible. All caretakers have been counseled to increase vigilance regarding provision of food/water to all animals. All investigators and research staff have been reminded to check cages to ensure that adequate food/water is present. Daily monitoring will now include an afternoon health check.

Based on its assessment of this explanation, OLAW understands that measures have been implemented to address the immediate problem as well as to reduce the likelihood of a recurrence program wide. While OLAW concurs with the actions taken by the institution to comply with the PHS Policy on Humane Care and Use of Laboratory Animals, we note that if another instance of death due to lack of food/water occurs, VCU will be placed on an enhanced reporting schedule. OLAW will no longer accept retraining as a corrective action for this specific noncompliance as all staff must know that animals require food/water in order to survive. As with other institutions experiencing animal deaths due to lack of food/water and failure to identify the problem during daily health checks, it is advisable to conduct a root cause analysis. Implementing redundant checks has been shown to be effective at other institutions. VCU could also consider evaluating staffing, supervision, training, and punitive measures. Feel free to contact me regarding steps that could be taken to ensure compliance.

Sincerely,

(b) (6)

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

cc: IACUC Chair
ACUP Director



VCU

Office of the Vice President for Research and Innovation

Office of the Vice President for
Research and Innovation
Virginia Commonwealth University

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psrao@vcu.edu

P. Srirama Rao, Ph.D.
Vice President for Research and Innovation

March 5, 2020

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 the death of four mice due to lack of water. Ms. Chuang, Director of Animal Care and Use Program has reported to you on February 12, 2020 via a telephone call.

Description of Incident:

On January 29, 2020, a Division of Animal Resources (DAR) caretaker found a cage containing four dead mice during morning health observations. It appears that these were recently weaned mice. The water bottle was empty. After the investigator was contacted, she indicated that lab personnel have not handled animals in this room since Friday, January 24. The investigation revealed that DAR husbandry caretaker failed to identify this cage before the animals were found dead.

Corrective action plan:

- (1) On February 6, the DAR husbandry caretaker involved in this incident received individual counseling and retraining regarding proper health observation procedures, which emphasized the importance of verifying appropriate food and water levels. Documentation of this retraining has been provided to the Director of Animal Care and Use Program and recorded in DAR's training file.
- (2) In order to minimize the possibility of a similar incident occurring in the future, at the 2/26/2020 DAR staff meeting all DAR staff with animal husbandry responsibilities were reminded to increase awareness regarding verification of food and water in each cage. Documentation and description of this meeting received during the staff meeting has been provided to the Director of Animal Care and Use Program as well as maintained in DAR's training folder.

- (3) On February 28, a broadcast email has been sent to investigators and research staff to remind them that animals must have appropriate food and water when they are through handling the cage. They were instructed to develop a habit of visually checking all cages before leaving the animal room. In addition, an educational session for all members of the ACUP emphasizing the importance of verifying appropriate food & water levels will be presented during the next ACUP Updates program.
- (4) DAR management is working on a plan to increase daily monitoring to include afternoon health observations. This will require more resources to implement.

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)

P. Srirama Rao, Ph.D.
Vice President for Research and Innovation

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Friday, March 6, 2020 10:12 AM
To: Kuei-Lan Chuang; OLAW Division of Compliance Oversight (NIH/OD); Wolff, Axel (NIH/OD) [E]
Cc: Srirama Rao; [REDACTED] (b) (6)
Subject: RE: Follow-up letter (VCU Assurance# D16-00180/A3281-01)

Good morning,

Thank you for the follow up letter. Dr. Wolf will respond soon.

Kind Regards,

Jacquelyn Tubbs, DVM, DACLAM
Veterinary Medical Officer
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 <kchuang@vcu.edu>
Sent: Thursday, March 5, 2020 4:59 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>; Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>
Cc: Srirama Rao <psrao@vcu.edu>; [REDACTED] (b) (6)
Subject: Follow-up letter (VCU Assurance# D16-00180/A3281-01)

Dear Dr. Wolff,

Attached please find the follow-up letter signed by Dr. Rao, VCU Institutional Official. I reported to you by phone on 2/12. The written report includes a detailed explanation of the situation and actions taken by VCU IACUC. The ACUP leadership, especially DAR management, is working together to take your advice seriously to increase daily monitoring to include afternoon health observations.

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 [REDACTED] (b) (6) or email to: kchuang@vcu.edu.

Sincerely,

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
Richmond, VA 23298
[REDACTED] (b) (6)
kchuang@vcu.edu

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: *aw*

Date: *2/12/20*

Time: *2:00*

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?

Mice dead after morning due to no water, caretakers didn't catch on daily checks, didn't see cage.

Species involved:

Personnel involved:

Dates and times:

Animal deaths:

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

Caretaker counseled + retrained.

Projected submission to OLAW of final report from Institutional Official:

Enhanced Reporting WARNING

OFFICE USE ONLY

Case # _____