



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

December 20, 2021

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

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 December 16, 2021 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Virginia Commonwealth University, following up on an initial telephone report on December 10, 2021. According to the information provided, OLAW understands that one live and six dead neonatal mice were found in the bedding in a cage which had been stationed to be taken to cage wash. The investigator responsible had failed to identify the litter of mice under the nest.

The immediate action taken upon discovery consisted of appropriately euthanizing the pup. The corrective actions consisted of counseling the investigator and laboratory staff to sift through bedding to ensure no animals are left prior to sending cages to cagewash.

Based on its assessment of this explanation, OLAW understands that measures have been implemented 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

(b) (6)



VCU

Office of Research and Innovation

Office of Research and Innovation
Animal Care and Use Program
Virginia Commonwealth University
BioTechnology Research Park
800 East Leigh Street, Suite 3000
Box 980568
Richmond, VA 23298-0568



December 16, 2021

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

Virginia Commonwealth University, in accordance with Assurance D16-00180 (A3281-01) and PHS Policy IV.F.3., provides this report of noncompliance regarding one live neonate left in the dirty side of cage. I have discussed and reported to you via a telephone call on December 10, 2021.

Description of Incident:

During morning health observations on November 22nd, the primary caretaker noted movement inside one of the dirty cages that had been placed onto a supply shelf rack for DAR to take to cage wash. Upon inspection, she found 6 dead neonates under the cage's nesting material. She also found one live neonate, which she humanely euthanized per vet staff instruction. It appears that the investigator did not see the litter of neonates underneath the nest. The funding source cannot be clearly identified since this investigator manages other investigators' mouse lines, including PHS funding and non-PHS funding.

Corrective action plan:

1. The investigator was contacted and acknowledged she missed seeing this litter. She will redouble her efforts and verify every cage that she puts on the DAR shelf.
2. All lab personnel should be reminded to sift through bedding and lift nesting material to verify that no animals remain in the cage prior to placing the cage onto the shelf for DAR to take to cage wash.

Axel V. Wolff, M.S., D.V.M.
December 16, 2021
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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 yours,

(b) (6)



Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Friday, December 17, 2021 7:21 AM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: [EXTERNAL] Follow-up noncompliance letter (VCU Assurance# D16-00180/A3281-01)

Thank you for this report, (b) (6) We will respond soon.
Axel Wolff

From: (b) (6)
Sent: Thursday, December 16, 2021 9:49 AM
To: Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>; OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: P. Srirama Rao <psrao@vcu.edu>
Subject: [EXTERNAL] Follow-up noncompliance letter (VCU Assurance# D16-00180/A3281-01)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and are confident the content is safe.

Dear Dr. Wolff,

Attached please find the follow-up non compliance letter submitted by me on behalf of VCU's Institutional Official, Dr. Rao (cc on this email). This is another incident I reported to you on 12/10. The written report includes a detailed explanation of the situation and actions taken by VCU IACUC.

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: (b) (6)

Sincerely,

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(b) (6)



Initial Report of Noncompliance

By: (b) (6)

Date: 12/10/21

Time: 10:30

Name of Person reporting: (b) (6)
 Telephone #: (b) (6)
 Fax #:
 Email:

Name of Institution: VCU
 Assurance number: A3281

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

What happened?
*1 pup found in bedding in cage wash area.
 Not found by PI during cage change.*

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

Projected plan and schedule for correction/prevention (if known): _____
Exchange pup & Counsel PI.

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY
 Case # _____