



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

June 17, 2025

Re: Animal Welfare Assurance  
A3281-01 [OLAW Case 3B]

P. Srirama Rao, Ph.D.  
Vice President for Research and Innovation  
Virginia Commonwealth University  
800 East Leigh St.  
Biotech One -(b) (4)  
Richmond, VA 23219

Dear Dr. Rao,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your May 22, 2025 letter providing additional requested information about the incident described in A3281-01, OLAW Case 3B.

According to the additional information provided, OLAW understands that corrective and preventive measures were enacted in addition to those previously reported. 1) Husbandry staff retraining emphasized the importance of reporting any concerns about food or water availability and animal health status to their supervisor or the vivarium manager. Further, all Division of Animal Resources (DAR) staff were retrained on reporting incomplete or missing room activity log entries to their supervisors or veterinary staff. 2) The responsible husbandry staff members received a memorandum of counselling and were warned about the possibility of progressive disciplinary action if their future performance does not meet standards of care. 3) Vivarium management staff will visually confirm that food and water are accessible. If discrepancies are found, they will be reported to the Vivarium Managers, veterinary staff, and/or senior DAR leadership. 4) Senior DAR leadership now regularly performs inspections of activity logs and animal housing rooms to promptly inform the Attending Veterinarian (AV) of any issues found.

Institutional and laboratory procedures were also changed to prevent recurrence. 1) Senior DAR leadership will work closely with the responsible laboratory to ensure that all laboratory personnel understand existing policies, especially if the project includes altering food or water. 2) The orientation training required for all animal handlers has been enhanced to emphasize food and water monitoring. 3) The IACUC sent a reminder to all investigators and laboratory personnel to double-check cages for adequate food and water and to observe animal health before leaving the animal room.

OLAW appreciates the consideration of this matter by Virginia Commonwealth University which was consistent with the philosophy of institutional self-regulation. Based on the information provided, appropriate actions have been taken. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

Robyn M. Engel -S  
Digitally signed by Robyn M. Engel  
Date: 2025.06.17 11:05:25 -04'00'

Robyn M. Engel, DVM  
Animal Welfare Program Specialist  
Office of Laboratory Animal Welfare

cc: IACUC contact



May 22, 2025

Robyn M. Engel, D.V.M.  
Animal Program Specialist  
Office of Laboratory Animal Welfare  
National Institutes of Health

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

Dear Dr. Engel:

Thank you for acknowledging VCU's April 25, 2025, letter reporting noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals. The following additional corrective and preventative actions were completed in response to this incident:

1. Husbandry Staff Retraining Details:

- All relevant DAR SOPs and ACUP policies have been reviewed and reinforced for the DAR husbandry staff involved in this incident. This training emphasized the importance of reporting any concerns related to food or water availability and overall animal health status (i.e., recognizing clinical signs of pain or distress) to their supervisor/vivarium manager, regardless of study type. Training documentation has been provided to the Director of ACUP. The two husbandry staff involved in this incident have received a memorandum of counseling, which includes the possibility of progressive disciplinary actions if their future performance does not meet our standards for animal care.
- To minimize the possibility of similar incidents occurring in the future, the relevant DAR SOPs and ACUP policies have been reviewed and reinforced for all DAR husbandry staff and vivarium management staff have been directed to visually confirm that food and water are accessible and to immediately report any discrepancies to their vivarium manager regardless of study type. Vivarium Managers will, in turn, notify veterinary staff and/or senior DAR leadership (e.g., Deputy Operations Manager, Assistant Director Operations and/or Assistant Director Program Development). Training documentation has been shared with the Director of ACUP.
- Additional instructions have been provided to all DAR staff on how to review and interpret room activity logs. It has been reinforced that incomplete or missing log entries must be reported promptly to their supervisors or veterinary staff as stated above.

Virginia Commonwealth University

Office of the Vice President for  
Research and Innovation

BioTech One, (b) (4)  
800 East Leigh Street  
Box 980568  
Richmond, Virginia 23298

(b) (6)

[research.vcu.edu](http://research.vcu.edu)

P. Srirama Rao, Ph.D.  
Vice president for research and  
innovation

- Senior DAR leadership (e.g., Deputy Operations Manager, Assistant Director Operations and/or Assistant Director Program Development) are now regularly performing thorough inspections of activity logs and animal housing rooms. Any incomplete log entries and/or cage issues are being flagged and investigated immediately and reported to the Attending Veterinarian.

## 2. Institutional and Laboratory Procedural Changes:

In addition to the measures we outlined in our initial letter, the following procedural changes have been implemented to minimize the possibility of recurrence in the future:

- Senior DAR leadership (e.g., Deputy Operations Manager, Assistant Director Program Development) will work closely with this lab in the future to make sure all lab personnel understand DAR and ACUP policies and expectations for working in an animal room, especially if they will be working with specialized studies involving altered food and water.
- VCU's Animal Care and Use Program requires all animal handlers to complete both the in-person facility vivarium orientation and the online vivarium training module before being granted access to animal rooms. As part of our ongoing efforts to strengthen training, we continue enhancing our training content related to food and water monitoring. For example:
  - In-Person Facility Orientation: We expanded the "Food and Water Issues – DAR and Researcher Responsibilities" section to emphasize the importance of lab personnel visually verifying that every cage they handle has adequate food and water and that the animals appear healthy before leaving the animal room.
  - Online Vivarium Training: We added a new section addressing "Food and Water Issues". This section highlights the importance of checking the availability of food and water in each cage and reinforces this as a critical daily responsibility.
- On May 15th, the IACUC sent a message to all investigators and laboratory personnel, reminding them to double-check cages for adequate food and water and to observe animal health following any handling before leaving the animal room.

Ensuring animal health and well-being is a shared and essential responsibility for all personnel—both research staff and DAR animal care staff—and this message will be reinforced at every opportunity.

We trust that our actions will strengthen our program's oversight and help ensure that all animals receive the highest standard of care, regardless of study design. We remain committed to continuous improvement and to maintaining compliance with the PHS Policy.

Sincerely,

DocuSigned by:

(b) (6)

EA920342DBAE43B...

P. Srirama Rao, Ph.D.

Vice President for Research and Innovation

**Ware, Teagan (NIH/OD) [E]**

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**From:** (b) (6)  
**Sent:** Tuesday, May 27, 2025 7:41 AM  
**To:** OLAW Division of Compliance Oversight (NIH/OD)  
**Cc:** psrao@vcu.edu; (b) (6) Engel, Robyn (NIH/OD) [E]  
**Subject:** Re: [EXTERNAL] Re: OLAW case A3281-3B

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good morning Teagan,

Thank you for acknowledging receipt of the requested information. If you need anything further, please don't hesitate to reach out.

Best regards,

(b) (6)

On Tue, May 27, 2025 at 6:43 AM OLAW Division of Compliance Oversight (NIH/OD) <[olawdco@od.nih.gov](mailto:olawdco@od.nih.gov)> wrote:

Good morning,

Thank you for providing this requested information for OLAW case **A3281-3B**. We will send an official response soon.

Best,

Teagan

Teagan Ware, MS, PMP

Animal Welfare Program Analyst

Division of Compliance Oversight

Office of Laboratory Animal Welfare

National Institutes of Health

## Ware, Teagan (NIH/OD) [E]

---

**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Tuesday, May 27, 2025 6:43 AM  
**To:** (b) (6)  
**Cc:** psrao@vcu.edu; (b) (6) OLAW Division of Compliance Oversight (NIH/OD); Engel, Robyn (NIH/OD) [E]  
**Subject:** RE: [EXTERNAL] Re: OLAW case A3281-3B

Good morning,

Thank you for providing this requested information for OLAW case **A3281-3B**. We will send an official response soon.

Best,  
Teagan

Teagan Ware, MS, PMP  
Animal Welfare Program Analyst  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
6700B Rockledge Drive, Room 2505

Phone: 301-435-2390

Email: [teagan.ware@nih.gov](mailto:teagan.ware@nih.gov)

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**From:** (b) (6)  
**Sent:** Friday, May 23, 2025 10:22 PM  
**To:** Ware, Teagan (NIH/OD) [E] <teagan.ware@nih.gov>; OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>; Engel, Robyn (NIH/OD) [E] <robyn.engel@nih.gov>  
**Cc:** psrao@vcu.edu; (b) (6)  
**Subject:** [EXTERNAL] Re: OLAW case A3281-3B

Dear Dr. Engel,

Please find attached the additional information requested by OLAW. Should you have any questions, do not hesitate to contact me.

Best regards,

(b) (6)



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Facsimile: (301) 480-3387

May 5, 2025

Re: Animal Welfare Assurance  
A3281-01 [OLAW Case 3B]

P. Srirama Rao, Ph.D.  
Vice President for Research and Innovation  
Virginia Commonwealth University  
800 East Leigh St.  
Biotech One - (b) (4)  
Richmond, VA 23219

Dear Dr. Rao,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your April 25, 2025, letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals within the animal care and use program at Virginia Commonwealth University. According to the information provided, OLAW understands that 5 mice were found dead, and a sixth moribund mouse was euthanized, due to dehydration. The animals were on a special water study. One of the responsible students was absent, and did not inform their colleagues, resulting in the animals not receiving daily care, including water bottle refills. Husbandry staff members noticed that the daily room activity log was not appropriately completed by the students, but did not report the issue to their managers or veterinary staff as required. The animals involved were supported by NIH funds.

Preventive and corrective measures were enacted. Both students involved in the incident will be removed from the protocol, and their access to the animal facility will be revoked. In addition, all animal resources husbandry staff are being reminded of proper procedures for special husbandry cages.

OLAW appreciates the consideration of this matter by Virginia Commonwealth University which was consistent with the philosophy of institutional self-regulation. However, more information is needed.

OLAW views instances of lack of basic living requirements such as food, water, and a proper cage environment with great concern. Please describe husbandry staff retraining in greater detail. For example, did the training include recognition of clinical signs of distress and/or daily cage checks to ensure that all animals have access to food and water, regardless of special studies? Please also describe any institutional or laboratory procedures that were changed to prevent recurrence. **Please provide additional information to this office by June 6, 2025.**

Sincerely,

Robyn M. Engel -  
S Digitally signed by Robyn M. Engel -S  
Date: 2025.05.05 14:10:37 -04'00'

Robyn M. Engel, DVM  
Animal Welfare Program Specialist  
Office of Laboratory Animal Welfare

cc: IACUC contact

## Ware, Teagan (NIH/OD) [E]

---

**From:** Ware, Teagan (NIH/OD) [E]  
**Sent:** Monday, May 5, 2025 2:25 PM  
**To:** psrao@vcu.edu  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD); (b) (6)  
(b) (6)  
**Subject:** OLAW case A3281-3B  
**Attachments:** A3281-3B\_interim.pdf

Good afternoon Dr. Rao,

Attached please find Dr. Engel's response to OLAW case A3281-3B. Please note that additional information is being requested, and a response should be submitted to OLAW by no later than **June 6, 2025**.

If you have any questions, please feel free to contact us by e-mail or by phone.

Best,  
Teagan

Teagan Ware, MS, PMP  
Animal Welfare Program Analyst  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
6700B Rockledge Drive, Room 2505

Phone: 301-435-2390  
Email: [teagan.ware@nih.gov](mailto:teagan.ware@nih.gov)

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A3281-3B  
VCU

April 25, 2025

Jacquelyn Tubbs, D.V.M.  
Senior Animal Welfare Program Specialist  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
(301) 402-2081

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

Dear Dr. Tubbs:

Virginia Commonwealth University, in accordance with its Assurance D16-00180 (A3281-01) and PHS Policy IV.F.3., submits this report of noncompliance involving the death of five mice and the euthanasia of one additional mouse.

**Description of Incident:**

On April 1, 2025, during routine daily health observations, Division of Animal Resources (DAR) staff discovered five single-housed mice deceased. A sixth mouse was found moribund and was humanely euthanized under the direction of veterinary staff.

These animals were part of a special water study managed by two VCU student study staff. One of the students failed to refill the specialized water bottles as required. Additionally, the student did not inform laboratory colleagues of their absence during the week, resulting in the animals not receiving necessary daily care, including water bottle refills.

This type of study requires lab personnel to check the bottle levels daily and document the check by initialing a room activity log. As part of their morning observations, husbandry staff are expected to verify that initials have been entered on the log. Since they typically arrive earlier than research personnel, they usually check for initials from the previous day. If no initials are present, husbandry staff are instructed to mark an "X" in the initials box, submit a health observation report, and notify their vivarium manager and veterinary staff. Vet staff will then follow up with the lab to confirm whether the task was completed but not documented.

In this case, husbandry staff correctly marked the "X" for days with missing initials, but they did not report the issue or inform DAR management or veterinary staff as required.

Virginia Commonwealth University

Office of the Vice President for  
Research and Innovation

BioTech One, (b) (4)  
800 East Leigh Street  
Box 980568  
Richmond, Virginia 23298

(b) (6)

[research.vcu.edu](http://research.vcu.edu)

P. Srirama Rao, Ph.D.  
Vice president for research and  
innovation

**Corrective action plan:**

1. The Animal Care and Use Program (ACUP) leadership, including the Director, IACUC Chair, and the Attending Veterinarian, met with the investigator and the lab member to review this incident and discuss accountability on April 8, 2025.
2. Both students involved in this incident will be removed from the protocol, and their access to the animal facility has been revoked.
3. All DAR husbandry staff are being reminded of proper procedures for special husbandry cages.

Although the animals involved were part of a PHS-funded research project, a review of the direct costs associated with the procurement, care, and use of these animals determined that the financial impact of this noncompliance is insignificant. Therefore, no adjustment to the grant is necessary.

We deeply regret this incident and have taken specific corrective actions to enhance our program and prevent future occurrences. The IACUC leadership has reviewed these actions, and they will be presented to the full committee during its next meeting.

We appreciate your consideration of VCU's efforts to address this incident and prevent future occurrences. VCU assures OLAW of its commitment to animal welfare and acknowledges its ethical responsibilities to ensure the well-being of research animals and to comply with the PHS Policy on Humane Care and Use of Laboratory Animals.

Sincerely,

DocuSigned by:  
  
EA920342DBA543B...  
P. Srirama Rao, Ph.D.  
Vice President for Research and Innovation

## Ware, Teagan (NIH/OD) [E]

---

**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Friday, May 2, 2025 7:55 AM  
**To:** (b) (6)  
**Cc:** Srirama Rao; (b) (6); OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: [EXTERNAL] Follow-up noncompliance letter (VCU Assurance# D16-00180/A3281-01)

Good morning,

Thank you for providing this report, which has been assigned as OLAW case **A3281-3B**. We will send an official response soon.

Best,  
Teagan

Teagan Ware, MS, PMP  
Animal Welfare Program Analyst  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
6700B Rockledge Drive, Room 2505

Phone: 301-435-2390

Email: [teagan.ware@nih.gov](mailto:teagan.ware@nih.gov)

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---

**From:** (b) (6)  
**Sent:** Thursday, May 1, 2025 4:11 PM  
**To:** Tubbs, Jacquelyn (NIH/OD) [E] <jacquelyn.tubbs@nih.gov>; OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Srirama Rao <psrao@vcu.edu>; (b) (6)  
**Subject:** [EXTERNAL] Follow-up noncompliance letter (VCU Assurance# D16-00180/A3281-01)

Dear Dr. Tubbs,

Attached is the follow-up noncompliance letter, signed by VCU's Institutional Official, Dr. Rao (copied on this email). I had initially left a voicemail for Dr. Morse on April 15, but later learned that he retired from the Office of Laboratory Animal Welfare (OLAW) as of Friday, April 11, 2025.

The attached report provides a detailed explanation of the situation and outlines the steps taken by the VCU IACUC in response.

We appreciate your attention to this matter. VCU remains fully committed to meeting its responsibilities under the Public Health Service Policy on the Humane Care and Use of Laboratory Animals and the *Guide for the Care and Use of Laboratory Animals*, while continuing to uphold the highest standards of animal welfare.

If you have any questions, please don't hesitate to contact me at (b) (6) or via email at (b) (6)

Best regards,

(b) (6)