



Office of Laboratory Animal Welfare
Bethesda, Maryland 20892

Telephone: (301) 496-7163
Home Page: <https://olaw.nih.gov>

April 2, 2026

Re: Animal Welfare Assurance
A3281-01 (OLAW Case 3C)

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

Dear Dr. Rao,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your March 11, 2026, letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Virginia Commonwealth University (VCU) following up on an initial February 24, 2026, notification by telephone.

According to the information provided, this Office understands that the VCU Institutional Animal Care and Use Committee (IACUC) determined that instances of noncompliance occurred with respect to failure to adhere to the IACUC-approved protocol. The final report states that the IACUC reviewed two incidents that were associated with protocol noncompliance under the same protocol. It is stated that some mortality is expected with a cancer research protocol, however it was determined that the drugs were not administered to the mice as described in the approved protocol. The first incident resulted in 8 dead mice and 15 mice were euthanized. The second incident resulted in 10 dead mice, and 16 mice were euthanized. Per the report, lab personnel did not adhere to the monitoring frequencies described in the protocol as the animals approached humane endpoints.

In response to the findings, the following corrective measures were implemented (in summary):

- A formal noncompliance letter outlining required corrective actions was issued to the PI on February 23, 2026, requiring signature to ensure future compliance accountability.
- The PI acknowledged responsibility for the protocol noncompliance and assured the IACUC that similar incidents would not recur.
- The PI will submit an amendment to include all drugs administered to animals.
- Prior to initiating any future experiments, all personnel must verify that the procedures align with the approved protocol.
- The importance of protocol-required monitoring must be reinforced with all personnel, and monitoring must be performed as described in the approved protocol.
- Any recurrence of these concerns will result in further IACUC action, including notifying the department chair and placing the laboratory under Close Veterinary Supervision (CVS).

It is noted that the corrective action plan was presented to the IACUC on March 11, 2026, and OLAW assumes the committee determined the corrective actions were acceptable. It is noted that the research project is supported by NIH funding.

Based on its assessment of this explanation, OLAW understands that Virginia Commonwealth University has implemented appropriate measures to correct and prevent recurrence of these problems and is now compliant with provisions of the PHS Policy.

We appreciate being informed of these matters and find no cause for further action by this Office.

Sincerely,

JACQUELYN

T. TUBBS -S

Digitally signed by JACQUELYN T.
TUBBS -S
Date: 2026.04.02 07:53:10 -04'00'

Jacquelyn Tubbs, DVM, DACLAM
Acting Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC contact

March 11, 2026

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

Re: VCU Animal Welfare Assurance number D16-00180 (A3281-01)
[OLAW Case A3281-3C]

Dear Dr. Tubbs:

Virginia Commonwealth University, in accordance with Assurance D16-00180 (A3281-01) and PHS Policy IV.F.3, submits this report of protocol noncompliance concerning two adverse event reports reviewed by the VCU IACUC on February 11, 2026. These events were reported to OLAW on February 24, 2026, via a telephone call by (b) (6). The funding source for these events is the National Cancer Institute/NIH/DHHS.

Description of Adverse Events #1 and #2:

On February 11, 2026, the VCU IACUC reviewed two adverse events and determined that both were associated with protocol noncompliance under the same protocol. The first event involved eight mice found deceased, and fifteen mice euthanized. The second event involved ten mice found deceased and sixteen mice euthanized. While some mortality is anticipated under this cancer research protocol, drugs administered to the animals were not described in the IACUC-approved protocol. Furthermore, laboratory personnel failed to adhere to the protocol-specified monitoring frequencies as animals approached humane endpoints.

Corrective Actions:

On February 17, 2026, ACUP leadership, including the Director, IACUC Chair, the Attending Veterinarian, and a compliance staff member, convened with the Principal Investigator (PI) and the involved laboratory member to address the noncompliance.

The following corrective actions were implemented immediately:

1. A formal noncompliance letter outlining required corrective actions was issued to the PI on February 23, 2026, requiring signature via DocuSign to ensure future compliance accountability.
2. The PI acknowledged responsibility for the protocol noncompliance and assured the IACUC that similar incidents would not recur.
3. The PI will submit an amendment to include all drugs administered to animals.
4. Prior to initiating any future experiments, all personnel must verify that the procedures align with the approved protocol.

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

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

5. The importance of protocol-required monitoring must be reinforced with all personnel, and monitoring must be performed as described in the approved protocol.
6. Any recurrence of these concerns will result in further IACUC action, including notifying the department chair and placing the laboratory under Close Veterinary Supervision (CVS). Under CVS, the investigator and lab members will have limited access to animals and will be subject to close oversight by the Attending Veterinarian or his designated DAR staff according to IACUC's Written Policies and Procedures.

VCU deeply regrets this instance of protocol noncompliance and has implemented targeted corrective measures to strengthen oversight and prevent recurrence. IACUC leadership has reviewed these actions and presented them to the full committee meeting on March 11, 2026.

We appreciate your consideration of VCU's prompt 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:

(b) (6)

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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: Thursday, March 26, 2026 11:59 AM
To: (b) (6)
Cc: Srirama Rao; (b) (6); Tubbs, Jacquelyn (NIH/OD) [E]; OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: [EXTERNAL] Follow-up noncompliance letter (VCU Assurance# D16-00180/A3281-01)

Good afternoon,

Thank you for providing these final reports for OLAW cases **A3281-3C** and **A3281-3D**. We will send official responses soon.

***Disclaimer:** 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.*

Best,
Teagan

Teagan Ware, MS, PMP
Animal Welfare Program Analyst
Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health
6705 Rockledge Drive (RKL 1), MSC 7983

Phone: 301-435-2390
Email: teagan.ware@nih.gov

From: (b) (6)
Sent: Thursday, March 26, 2026 11:31 AM
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 are two follow-up letters (OLAW Case A3281-3C and OLAW Case A3281-3D), signed by VCU's Institutional Official, Dr. Rao (copied on this email). I discussed and reported these incidents to you on February 24 via telephone.

The attached reports provide a detailed explanation of the situations and outline the steps taken by the VCU IACUC in response. We appreciate your consideration of VCU's

efforts to address these incidents and prevent future occurrences. VCU affirms its commitment to animal welfare and acknowledges its ethical responsibility to ensure the well-being of research animals and compliance with the PHS Policy on Humane Care and Use of Laboratory Animals.

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)



A3281-3C

Initial Report of Noncompliance

By: J. Tubbs

Date: 2-24-2026

Time: 950A

Name of Person reporting: (b) (6)

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: Virginia Commonwealth University

Assurance number: A3281-01

Did incident involve PHS funded activity?

Funding component:

Was funding component contacted (if necessary): _____

What happened?

Protocol noncompliance. Drug was used that was not described in the protocol. Failure to monitor animals as described in the protocol Dec 2025. Involved Mice. Animal deaths were present.

Species involved: mice

Personnel involved: research staff

Dates and times: Dec 2025

Animal deaths: yes

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

Projected submission to OLAW of final report from Institutional Official:

60-90d

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Case # _____