



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

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 3D)

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 conditions that jeopardized the health/well-being of animals resulting in harm/death to animals. The final report states a small trial of a new water valve for use with the institution's water Hydropacs occurred in July 2025, and no issues were noted during the trial. The new valves were fully implemented during winter break when staffing was low, and it is understood that animal health issues increased in the barrier facility's NSG breeding rooms where the new valves were in use. Investigative findings revealed oversights had occurred, including a lack of documented procedures and results of the initial trial and a failure to inform investigators prior to the full-room equipment change.

In response to the incident, the following corrective actions were taken (in summary):

- All AquaValves were promptly replaced with Hydropac valves by January 7, 2026, and there are no plans to use the AquaValves in the future.
- Future product assessments will be clearly defined with written testing plans and carefully monitored, with outcomes reported to ACUP/DAR leadership and impacted investigators prior to implementation.
- Product assessment steps will be developed by senior DAR leadership. Permanent changes will be approved in writing by senior DAR leadership prior to implementation and will include review by at least one veterinarian. An SOP for product assessment will be developed.

Per the report, the corrective actions were presented to the full IACUC at the meeting held on March 11, 2026. OLAW assumes the committee found the corrective actions to be acceptable. It is noted that animals involved in the incident were associated with research projects partially funded by PHS.

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
07:48:06 -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 A3281-3D]

Dear Dr. Tubbs:

Virginia Commonwealth University, in accordance with Assurance D16-00180 (A3281-01) and PHS Policy IV.F.3, submits this report of noncompliance regarding the demise of sixteen adult mice and seven pups, as well as one additional mouse that was euthanized, associated with AquaValve-related issues. This incident was reported to OLAW on February 24, 2026 via a telephone call by (b) (6). (b) (6) The animals involved in this incident were part of both PHS-funded and non-PHS-funded research projects.

Description of Incident:

VCU Division of Animal Resources (DAR) conducted a small trial of a new water valve (Aqua Valve) for use with our sterile water Hydropacs in July, 2025. No issues were noted during this trial. Full roll-out of the new valves occurred just before VCU's winter break, when staffing was low. During VCU's winter break (12/22/2025–1/5/2026), animal health issues increased in the barrier facility's NSG breeding rooms where these new valves were implemented.

The surge in health issues prompted a review of historical data to determine if the numbers exceeded trend reports. The subsequent investigation revealed oversights, including a lack of documented procedures and results of the initial trial and a failure to notify investigators prior to the full-room equipment change.

Corrective Actions:

The following corrective actions were implemented:

1. Due to concerns identified above, all AquaValves were promptly replaced with Hydropac valves by January 7, 2026. DAR does not plan to use the AquaValves again in the foreseeable future.
2. Future product assessments will be clearly defined with written testing plans and carefully monitored, with outcomes reported to ACUP/DAR leadership and impacted investigators prior to implementation. Product assessment steps will be developed by senior DAR leadership utilizing a structured, scientific approach to ensure meaningful data collection for evaluation. Permanent changes will be

Virginia Commonwealth University

Office of the Vice President for
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P. Srirama Rao, Ph.D.
Vice president for research and
innovation

approved in writing by senior DAR leadership prior to implementation, and will include review by at least one veterinarian. An SOP for product assessment will be developed to describe this process in detail.

VCU deeply regrets this incident 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 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:
[Redacted Signature] (b) (6)
EA920342DBAE43B...

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)



A3281-3D

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?

Hydropac changed the valve on the pack. Animal found dead and dehydrated because young pups could not use new valve. Therefore, the staff removed the new valve and now using the original valves. 16 adult mice and 7 pups involved, one mouse euthanized.

Species involved: mice

Personnel involved: facility staff

Dates and times: Dec 2025 through January 2026.

Animal deaths: n/a

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 # _____