



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 22, 2026

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

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 April 16, 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 April 16, 2026, notification by telephone. It is noted that the research project is not supported by PHS funding.

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 perform animal activities as described in the approved protocol. The final report states on March 18, 2026, during an IACUC inspection, it was discovered a student performed procedures on mice and rats that were not accurately described in the protocol. Also, it was determined that the pain management practices did not continually adhere to the protocol as described.

In response to the findings, the following corrective measures were implemented:

- March 20, 2026- The IACUC Chair notified the Principal Investigator (PI) to cease all animal work related to the procedures identified until a submitted amendment is reviewed and approved by the IACUC.
- The PI submitted an amendment to provide more detailed descriptions of the procedures on March 20, 2026. The IACUC convened an urgent full committee meeting and formally voted to suspend procedures until all IACUC queries and comments were addressed and the amendment is approved.
- The amendment was approved by the IACUC on April 14, 2026.
- A veterinarian will observe the next scheduled procedure in its entirety.
- The Post-Approval Monitoring team will conduct a targeted review/audit of surgical and anesthetic records, following the resumption of study activities, to verify consistent compliance.

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: 2026.04.22
09:32:39 -04'00'

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

cc: IACUC contact



A3281-3E
VCU

April 16, 2026

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

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

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

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 concerns related to activities conducted under an IACUC-approved protocol. This matter was initially reported to OLAW on April 16, 2026, via a telephone call by (b) (6). (b) (6) The activity is not supported by PHS funding.

Description of the concern:

During a recent IACUC inspection on March 18, 2026, it was determined that procedures performed by a student on rodents were not accurately described in the approved IACUC protocol, and pain management practices were not consistently followed.

Corrective Actions:

The following corrective actions were implemented:

1. Immediate Actions - Protocol Suspension and Amendment Submission:
 - On March 19, 2026, the IACUC Chair notified the Principal Investigator (PI) to cease all animal work related to the procedures identified until a submitted amendment is reviewed and approved by the IACUC.
 - On March 20, the PI submitted an amendment to provide more detailed descriptions of the procedures.
 - On March 24, the IACUC convened an urgent full committee meeting and formally voted to suspend the procedures until all IACUC queries and comments have been addressed and the amendment is approved.
 - On April 8, the IACUC re-reviewed this amendment and approved it on April 14.

2. Enhanced Oversight and Monitoring:

- As a condition for approval of the amendment, a veterinary observation will be mandatory. A veterinarian will observe the next scheduled procedure in its entirety, including the surgical procedure and recovery from the procedure, and observation of the animal for three days post-procedure to ensure compliance with the approved protocol.
- The Post-Approval Monitoring team will conduct a targeted review/audit of surgical and anesthetic records, following the resumption of study activities, to verify consistent compliance.

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)
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: Friday, April 17, 2026 6:15 AM
To: (b) (6)
Cc: Srirama Rao; (b) (6); OLAW Division of Compliance Oversight (NIH/OD); Tubbs, Jacquelyn (NIH/OD) [E]
Subject: RE: [EXTERNAL] Follow-up final letter (VCU Assurance# D16-00180/A3281-01)

Good morning,

Thank you for providing this final report for OLAW case **A3281-3E**. We will send an official response 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, April 16, 2026 6:08 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 final letter (VCU Assurance# D16-00180/A3281-01)

Dear Dr. Tubbs,

Attached is the follow-up final letter, signed by VCU's Institutional Official, Dr. Rao (copied on this email). I discussed and reported this to you today via telephone.

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)



A3281-3E

Initial Report of Noncompliance

By: J. Tubbs

Date: 4-16-2026

Time: 1100A

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? Not PHS

Funding component:

Was funding component contacted (if necessary): _____

What happened?

During inspection, pain management practice was not adhered to as described, procedure was not fully captured in the protocol as it was being conducted by a student. In response, PI submitted amendment to clarify how a procedure was performed.

Species involved: mice and rats

Personnel involved: research

Dates and times: March 2026

Animal deaths: none

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 # _____