



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare
Rockledge One, Suite 360
6705 Rockledge Drive – MSC 7982
Bethesda, Maryland 20892-7982
Home Page: <http://grants.nih.gov/grants/olaw/olaw.htm>

FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare
Rockledge One, Suite 360
6705 Rockledge Drive
Bethesda, Maryland 20817
Telephone: (301) 496-7163
Facsimile: (301) 402-7065

December 19, 2017

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

Francis L. Macrina, PhD
Vice President for Research
Virginia Commonwealth University
Biotech One, Room #
800 East Leigh Street
Richmond, VA 23219

Dear Dr. Macrina,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your December 18, 2017 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 December 15, 2017 telephone notification. According to the information provided, OLAW understands that a Division of Animal Resources (DAR) technician failed to refill or replace a water bottle to one cage housing five mice prior to or over the weekend, resulting in the demise of four of the animals and euthanasia of the remaining dehydrated mouse. The associated animal activity in question was PHS funded.

The corrective actions consisted of individual counseling and retraining of primary and weekend DAR technicians on appropriate health monitoring procedures with a focus on ensuring animal health and availability of adequate food and water. At a December 13, 2017 staff meeting, all DAR personnel with assigned animal husbandry responsibilities were informed of the incident and retrained in an effort to increase awareness regarding verification of food and water in all cages.

The establishment and application of policies and practices that are consistent with the provisions of the PHS Policy on Humane Care and Use of Laboratory Animals at VCU are commendable and avoid the perception of a double standard. We appreciate having been informed about this matter and find no cause for further action by this Office.

Sincerely,

Signature

Neera V. Gopee, DVM, PhD, DACLAM, DABT
Animal Welfare Program Specialist
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC Chair

Secondary Individual Assistant Director for Animal Research



December 18, 2017

Neera Vintra Gopee, DVM, PhD, Veterinary Medical Officer
Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health
RKL1, Suite 360, MSC 7982
6705 Rockledge Drive
Bethesda, MD 20892-7982
(301) 594-3657

Office of Research and Innovation
BioTech One, 3rd Floor, Suite 3000
800 East Leigh Street
P.O. Box 980568
Richmond, Virginia 23298-0568
804 827-2262 • Fax: 804 828-2051
TDD: 1-800-828-1120
macrina@vcu.edu

Francis L. Macrina, PhD
Edward Myers Professor of Dentistry and
Vice President for Research and Innovation

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

Dear Dr. Gopee:

Virginia Commonwealth University, in accordance with Assurance D16-00180 (A3281-01) and PHS Policy IV.F.3., provides this report of noncompliance regarding lack of water resulting in the death of four mice. This incident was reported to you on December 15, 2017 via a telephone call by **Secondary Individual** Senior Associate Director for Animal Research, Office of Research Subjects Protection (ORSP).

Description of Incident:

On December 11, 2017, a Division of Animal Resources (DAR) animal care staff performing morning health observations reported one cage containing four mice found dead due to lack of water and one dehydrated mouse. The dehydrated mouse was euthanized for health reasons. The cage had adequate food but the water bottle was reported to be almost empty. It did not appear that the water bottle had been leaking based on visual inspection of the bottle and the overall condition of the bedding. The veterinarian performed a necropsy on the mice and confirmed that they died from dehydration. The investigator and lab staff were contacted and stated that they had not recently handled that cage. Our investigation revealed that DAR personnel did not detect that the water bottle needed refilling or replacement prior to or during the weekend, resulting in the deaths of the animals.

Corrective action plan:

- (1) Both the DAR primary and the weekend animal caretakers involved in this incident will receive individual counseling and retraining on proper health observation procedure, especially leading to a weekend, which will emphasize the importance of verifying appropriate food and water levels and overall animal health. Documentation of this counseling and retraining will be provided to ORSP and also recorded in DAR's training file.
- (2) In order to minimize the possibility of a similar incident occurring in the future, at the December 13, 2017 DAR staff meeting all DAR staff with animal husbandry responsibilities were apprised of this incident and retrained in order to increase awareness regarding verification of food and water in each cage. Documentation and description of this meeting received during the staff meeting was recorded and maintained in DAR's training folder.

Neera Vintra Gopee, DVM, PhD, Veterinary Medical Officer
December 18, 2017
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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 the next full committee meeting in January 2018.

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,

Signature

Francis L. Macrina, Ph.D.
Institutional Official
Edward Myers Professor of Dentistry and
Vice President for Research and Innovation

Gopee, Neera (NIH/OD) [E]

From: Gopee, Neera (NIH/OD) [E]
Sent: Monday, December 18, 2017 1:03 PM
To: Secondary Individual; OLAW Division of Compliance Oversight (NIH/OD)
Cc: Francis L Macrina; Secondary Individual
Subject: RE: Follow-up letter (VCU Assurance# D16-00180/A3281-01)

Thank you for this final report. We will send an official response soon.

Best Regards,
Neera

Neera V. Gopee, DVM, PhD, DACLAM, DABT
Veterinary Medical Officer
Office of Laboratory Animal Welfare
National Institutes of Health

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.

From: Secondary Individual [mailto:Secondary Individual@vcu.edu]
Sent: Monday, December 18, 2017 12:51 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>; Gopee, Neera (NIH/OD) [E] <neera.gopee@nih.gov>
Cc: Francis L Macrina <macrina@vcu.edu>; Secondary Individual @vcu.edu
Subject: Follow-up letter (VCU Assurance# D16-00180/A3281-01)

Dear Dr. Gopee,

Attached please find the follow-up reporting letter signed by Dr. Macrina, VCU Institutional Official. The incident was reported to you by phone on December 15, 2017. The written report includes a detailed explanation of the incident and actions taken by VCU.

We have reviewed this incident thoroughly and deployed specific corrective actions designed to enhance our animal program and to prevent future occurrences. 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 Phone Number or email to: Secondary Individual@vcu.edu.

Best Regards,

Secondary Individual

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Initial Report of Noncompliance

By: Neera Gopee

Date: 12-15-17

Time: 2:50pm

Name of Person reporting:

Secondary Individual

Telephone #:

Phone Number

Fax #:

Email:

Name of Institution:

Virginia Commonwealth University

Assurance number:

A3281-01

Did incident involve PHS funded activity? Yes

Funding component: _____

Was funding component contacted (if necessary): _____

What happened?

4 mice died and 1 euthanized as a result of water deprivation.

Species involved:

Personnel involved:

Dates and times:

Animal deaths:

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

Projected submission to OLAW of final report from Institutional Official:

OFFICE USE ONLY

Case # _____