



DEPARTMENT OF HEALTH & HUMAN SERVICES

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NATIONAL INSTITUTES OF HEALTH

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

February 2, 2022

Re: Animal Welfare Assurance
#A3518-01 [OLAW Case 2D]

Dr. Ishwar Puri
Vice President of Research
University of Southern California
3720 South Flower St., CUB (b) (4)
Los Angeles, CA 90089-0706

Dear Dr. Puri,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your January 28, 2022 letter reporting noncompliance with the PHS Policy on the Humane Care and Use of Laboratory Animals at the University of Southern California. Your letter supplements the information provided in the initial telephone report on August 5, 2021. According to the information provided it is understood that in May 2021, the IACUC was made aware of multiple incidents of unapproved euthanasia of mice, in addition to multiple violations relating to biosafety. The committee suspended the PI for an indefinite period. All IACUC protocols used by this laboratory were suspended. The PI and all members of the laboratory were not allowed access to animal facilities and were not allowed to carry out work of any kind involving research with animals. These were PHS-supported studies. All animals from these protocols were transferred to a holding protocol and non-federal funds used for housing.

The corrective and preventive measures included:

1. removal of the PI from all IACUC protocols and all oversight of animal research.
2. transfer of responsibility for all animal research to a colleague.
3. limitation of the number of students, staff or fellows that would be permitted to work with animals.
4. identification of a single individual in charge of animal research who in association with the new PI would critically assess all activity at all stages of experimentation.
5. a revised, more stringent management plan.
6. making efforts to change the culture in the laboratory, including attending meetings and training with the Director of Research Integrity at the University of Southern California.
7. submission of monthly reports describing research conducted and oversight activities.

The PI associated with these protocols was changed in 2021 and no longer reflects the PI to whom the suspension was given. With the change of PI and the modifications outlined above, the IACUC voted to partially lift the suspension, allowing the new PI and limited laboratory members to restart research. The original PI remains suspended indefinitely.

As of the date of this letter there have been no further incidents reported, the laboratory continues to attend training session with Director of Research Integrity, and the new PI remains in close contact with the IACUC.

Page 2 – Dr. Puri
February 2, 2022
OLAW Case A3518-2D

OLAW appreciates the consideration of this matter by the University of Southern California, which was consistent with the philosophy of institutional self-regulation. Based on the information provided, OLAW is satisfied that appropriate actions have been taken to investigate this incident, correct the non-compliance, and prevent recurrence. OLAW concurs that the incident warranted reporting. We appreciate being informed of this matter and find no cause for further action by this office.

Sincerely,

Brent C. Morse -S

Digitally signed by Brent C.
Morse -S
Date: 2022.02.02 07:47:29 -05'00'

Brent C. Morse, DVM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC contact



January 28, 2022

Brent Morse, D.V.M.

Director, 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

Dear Dr. Morse:

This is to report a suspension of animal use activity at the University of Southern California (animal welfare assurance number D16-00320/A3518-01). A preliminary report was provided to you on August 5, 2021. The IACUC protocols for this work were associated with PHS funding (R01DE021445, R01CA221521, R01CA134241 and R01DE026003). Please note that the PI associated with these protocols was changed in 2021 and no longer reflects the PI to whom the suspension was given.

In May 2021, the IACUC was made aware of multiple incidents of unapproved euthanasia of mice, in addition to multiple violations relating to biosafety. This was the third serious violation by the same laboratory within the prior two years. Given that the two prior incidents also resulted in a period of suspension, the committee on this occasion suspended the PI for an indefinite period. All IACUC protocols used by this laboratory were suspended. The PI and all members of the laboratory were not allowed access to animal facilities and were not allowed to carry out work of any kind involving research with animals. All animals from these protocols were transferred to a holding protocol and non-federal funds used for housing.

In response to this suspension the PI, his colleagues and the IACUC engaged in over 3 months of discussions and meetings in an effort to foster fully compliant research activities in this laboratory.

In summary the PI apologized for the incident, explained how the issues came about, provided detailed steps he and his colleagues were taking to ensure no further issues occurred, and agreed to increased monitoring and training. This included:

1. removal of the PI from all IACUC protocols and all oversight of animal research.
2. transfer of responsibility for all animal research to a colleague.
3. limitation of the number of students, staff or fellows that would be permitted to work with animals.
4. identification of a single individual in charge of animal research who in association with the new PI would critically assess all activity at all stages of experimentation.
5. a revised, more stringent management plan.
6. making efforts to change the culture in the laboratory, including attending meetings and training with the Director of Research Integrity at the University of Southern California.
7. submission of monthly reports describing research conducted and oversight activities.

With the change of PI and the modifications outlined above, the IACUC voted to partially lift the suspension, allowing the new PI and limited laboratory members to restart research. The original PI remains suspended indefinitely.

As of the date of this letter there have been no further incidents reported, the laboratory continues to attend training session with Director of Research Integrity, and the new PI remains in close contact with the IACUC.

Should you have any questions about these incidents, or the corrective actions outlined above, please do not hesitate to either contact me or the IACUC director at iacuc@usc.edu.

Sincerely,

(b) (6)

Ishwar K. Puri, Ph.D.
Vice President of Research

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Monday, January 31, 2022 7:09 AM
To: Ishwar Puri, Vice President of Research
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: Report of IACUC Suspension

Thank you for this report, Dr. Puri. We will send a response soon.

Axel Wolff, M.S., D.V.M.
Deputy Director, OLAW

From: Ishwar Puri, Vice President of Research <vice.president.research@usc.edu>
Sent: Friday, January 28, 2022 8:12 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Brett Thomas Lund <blund@usc.edu>; Institutional Animal Care and Use Committee <iacuc@usc.edu>
Subject: [EXTERNAL] Report of IACUC Suspension
Importance: High

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and are confident the content is safe.

Hello,

Please find the attached letter.

Sincerely,

Ishwar K. Puri, Ph.D.
Vice President of Research
University of Southern California

Morse, Brent (NIH/OD) [E]

From: Morse, Brent (NIH/OD) [E]
Sent: Wednesday, January 12, 2022 1:16 PM
To: Brett Thomas Lund
Subject: RE: August 2021 OLAW report?

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you Dr. Lund. This will suffice for now. If you're not able to send the final report by the end of January, please send an interim report. Thanks again.

Sincerely, Brent Morse

Brent C. Morse, DVM, DACLAM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health

From: Brett Thomas Lund <blund@usc.edu>
Sent: Wednesday, January 12, 2022 12:17 PM
To: Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>
Subject: [EXTERNAL] Re: August 2021 OLAW report?

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and are confident the content is safe.

Hello Dr Morse,

Thank you for your note. We are still working the final report on this incident, which was a 3rd suspension for this particular PI.

I expect to have something by the end of the month, would that suffice, or do you need something sooner?

Please advise,

Brett

Brett T. Lund, Ph.D.
Associate Professor, Neurology
McKibben Annex, (b) (4)
1333 San Pablo St,
Los Angeles, CA 90033

(b) (6)

From: Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>
Sent: Wednesday, January 12, 2022 7:27 AM
To: Brett Thomas Lund <blund@usc.edu>
Subject: August 2021 OLAW report?

Hello Dr. Lund,

I'm checking on the status of an incident you reported to me on August 5th involving 11 mice euthanized by cervical dislocation without anesthesia/narcosis. We don't have any updated information. Please supply either a final or an interim report. Thank you.

Best regards, Brent Morse

Brent C. Morse, DVM, DACLAM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health



Initial Report of Noncompliance

By: BCM

Date: 8/5/2021

Time: 3:35

Name of Person reporting: (b) (6) Dr. Bret Lund

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: University of Southern Calif. (USC)

Assurance number: A3518

Did incident involve PHS funded activity? yes

Funding component:

Was funding component contacted (if necessary):

What happened? 11+ mice euthanized in lab by cervical disloc. without CO2.

Species involved: mouse

Personnel involved: Lab staff

Dates and times: May 2021 to recent

Animal deaths: euthanized

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

Five protocols suspended and personnel suspended from animal activities. Three protocols were NIH funded. PI to be replaced.

Projected submission to OLAW of final report from Institutional Official:

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Case #