



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
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) 402-7065

March 12, 2019

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

Randolph W. Hall, Ph.D.  
Vice President for Research  
University of Southern California  
3720 Flower Street, (b) (4)  
Los Angeles, CA 90089-0706

Dear Dr. Hall:

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your March 5, 2019 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of Southern California, following up on an initial telephone report on November 9, 2018. According to the information provided, OLAW understands that a mouse was euthanized by cervical dislocation without use of anesthesia. This euthanasia method was not listed in the approved protocol.

The corrective actions consisted of counseling and retraining the laboratory member responsible on the appropriate conduct of euthanasia. The protocols were amended to clearly explain the euthanasia method and the laboratory staff was counseled on euthanasia and the content of the protocols. The study was supported by Department of Veterans Affairs grant # 2 I01BX001991-05A1.

Based on its assessment of this explanation, OLAW understands that measures have been implemented to correct and prevent recurrence of this problem. OLAW concurs with the actions taken by the institution to comply with the PHS Policy.

Sincerely,

(b) (6)

Axel V. Wolff, M.S., D.V.M.  
Deputy Director  
Office of Laboratory Animal Welfare

cc: IACUC Chair  
Animal Program Compliance Officer  
Michael Fallon, D.V.M., Ph.D., VA Chief Veterinarian  
(b) (6)



# USC University of Southern California

OFFICE OF RESEARCH  
*Randolph W. Hall*  
Vice President of Research  
wpres@usc.edu

March 5, 2019

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 an instance of animal welfare noncompliance that was reported to the IACUC at the University of Southern California (animal welfare assurance number D16-00320/A3518-01). (b) (6) provided a preliminary report to Dr. Axel Wolfe on November 9<sup>th</sup>, 2018. The IACUC approved protocol for this research was associated with Department of Veterans Affairs funding (grant funding # 2 I01BX001991-05A1) at the time of incident and the funding agency was informed of the noncompliance.

The incident occurred on October 23<sup>rd</sup>, 2018 when a laboratory staff member euthanized a mouse by cervical dislocation without prior anesthesia. This method was not an approved method of euthanasia on the IACUC protocol. The Principal Investigator was notified of the incident and indicated that he would have a meeting with his laboratory staff members to discuss the policies and regulations to avoid future instances of noncompliance.

The following corrective actions were taken by the IACUC:

The IACUC reviewed the incident at its November 14<sup>th</sup>, 2018 meeting of a full committee with a quorum in attendance. The committee voted to require the laboratory staff member meet with a veterinary staff member to review euthanasia policies and undergo euthanasia training. The PI was required to amend all protocols to clearly state both primary and secondary methods of euthanasia with justification if cervical dislocation without prior anesthesia was proposed. The Principal Investigator was also required to hold a refresher training with all members of the laboratory to thoroughly discuss euthanasia and all relevant policies for all protocols. The content of this meeting was documented, with attendees listed, and a report submitted to the IACUC.

The Principal Investigator provided a complete response to all of the required items on November 21<sup>st</sup>, 2018. The written response from the Principal Investigator, protocol amendments, and training documentation for the staff members were reviewed at the full IACUC meeting on January 23<sup>rd</sup>, 2019. The response was deemed

complete and acceptable by the committee. To date there have been no other instances of noncompliance in this laboratory.

Should you have any questions about these incidents or the corrective actions outlined above, please contact Dr. Donald Casebolt at (b) (6)

Sincerely,

(b) (6)

Randolph W. Hall, Ph.D.  
Vice President of Research

CC: Dr. Brett Lund, IACUC Chair, USC  
Dr. Donald Casebolt, Executive Director, Department of Animal Resources, USC  
(b) (6)

**Wolff, Axel (NIH/OD) [E]**

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Wednesday, March 6, 2019 6:47 AM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Report of Noncompliance

Thank you for this report, (b) (6) I changed the date and will send a response soon.

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

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**From:** (b) (6)  
**Sent:** Tuesday, March 5, 2019 3:43 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Subject:** Report of Noncompliance

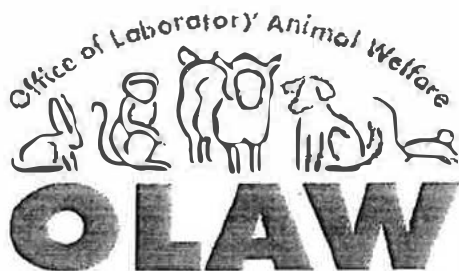
Hello,

The attached letter is a final report of Non-compliance.

Please let me know if you have any questions.

Best,





## Initial Report of Noncompliance

By: Nesha Gopee

Date: 12-4-18

Time: 2:18 pm

Name of Person reporting: (b)(6)

Telephone #: (b)(6)

Fax #:

Email:

Name of Institution: VA-IA

Assurance number: A3002-01

Did incident involve PHS funded activity?       

Funding component: VA merit Grant

Was funding component contacted (if necessary):       

What happened?

PI with office visitor euthanized a mouse with rectal probe  
via cervical dislocation contrary to the approved protocol at  
University of Southern California (USC) case already reported  
Species involved: on 11-9-18 compliance case A3518-1T  
Personnel involved: \* Include VA contacts on close off  
Dates and times: none  
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 #



Division of Compliance Oversight

Record of Call for Case # A3518-1T

Date & Time	Message	Initials
2/28/19 11:30	Final report letter written per (b) (6) (b) (6)	(b) (6)



## Initial Report of Noncompliance

By: And

Date: 11/9/18

Time: 1:35

Name of Person reporting: (b) (6)

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: U of Southern California

Assurance number: A3518

Did incident involve PHS funded activity? yes

Funding component: \_\_\_\_\_

Was funding component contacted (if necessary): \_\_\_\_\_

What happened?

Current dislocation on nose of and another, not on protocol

Species involved: Mouse

Personnel involved:

Dates and times:

Animal deaths:

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

Retaining, resolving compliance

Projected submission to OLAW of final report from Institutional Official:

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Case # \_\_\_\_\_