



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) 402-2803

August 22, 2006

Re: Animal Welfare Assurance  
A3196-01 [OLAW Case 2Y]

Roberto Peccei, Ph.D.  
Vice Chancellor for Research  
Office of the Chancellor  
University of California-Los Angeles  
405 Hilgard Avenue  
Los Angeles, CA 90024-1405

Dear Dr. Peccei,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your August 15, 2006 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the University of California, Los Angeles (UCLA) that was submitted supplemental to an August 25, 2005 memorandum signed by Dr. McBride sent via e-mail as an initial report to this Office on August 26, 2005. According to the information provided, OLAW understands that, at a convened meeting on August 22, 2005, the Chancellor's Animal Research Committee (ARC) suspended a research staff's privilege to conduct animal research at UCLA. This action was the result of the research staff member placing live mouse pups into a latex glove to be euthanized in August, 2005 in conflict with proper procedures.

It is understood that the research staff member no longer participates in any animal studies at UCLA and that suspension of her animal research privileges remain in place until such time that she completes a corrective action plan to be determined by her PI and the ARC.

OLAW appreciates being informed of these matters and find no cause for further action by this office.

Sincerely,

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

cc: Dr. William McBride, IACUC Chair

UCLA

UNIVERSITY OF CALIFORNIA,  
LOS ANGELES

A3196-2Y  
ROBERTO PECCEI  
*Vice Chancellor for Research*

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Box 951405  
Los Angeles, CA 90095-1405  
phone: 310-825-7943  
fax: 310-206-6030  
rpeccei@conct.ucla.edu

August 15, 2006

Axel V. Wolff, M.S., D.V.M.  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
Rockledge 1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, MD 20892-7982

RE: Final Report – Revocation of an Investigator’s Privileges to Conduct Animal  
Research at UCLA.

Dear Dr. Wolff:

I am writing to provide you with a final report pertaining to the Chancellor’s Animal Research Committee’s (ARC’s) decision to revoke Dr. Kum Kum Bhasin’s privilege to conduct animal research at UCLA<sup>1</sup>.

The Principal Investigator who employed Dr. Bhasin informed the ARC on May 10, 2005 that Dr. Bhasin would no longer participate in any of his studies. Therefore, no further action was required at that time.

As of the date of this letter, Dr. Bhasin has not participated in any other animal protocol at UCLA. Additionally, the Division of Laboratory animal Medicine (DLAM) revoked her key access to animal facilities. Should Dr. Bhasin wish to undertake animal research in another laboratory within UCLA, her Principal Investigator must consult with the ARC to determine an adequate corrective action plan, prior to consideration of a request to reinstate her privileges.

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<sup>1</sup> Dr. Bhasin was not named as a Principal Investigator of record for any study conducted at UCLA.

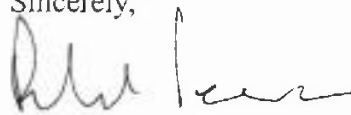
Axel V. Wolff, M.S., D.V.M.

August 15, 2006

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If you have any questions or concerns, please do not hesitate to contact me at (310) 825-7943.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roberto Peccei', written in a cursive style.

Roberto Peccei  
Vice Chancellor for Research

cc: Dr. William H. McBride, Chair, ARC  
Judith L. Brookshire, Director, OPRS  
Kathy Wadsworth, Associate Director, Animal Subjects Research

Wolff, Axel (NIH/OD)

A3196-2Y

To: Casey, Kathy

Subject: RE: Initial report regarding an incident of noncompliance

Hi Kathy,  
Thanks for this report. I look forward to receiving the final upon completion.

Axel Wolff, M.S., D.V.M.  
Director, Division of Compliance Oversight  
OLAW

-----Original Message-----

**From:** Casey, Kathy [mailto:KCasey@OPRS.UCLA.EDU]  
**Sent:** Friday, August 26, 2005 12:10 PM  
**To:** Wolff, Axel (NIH/OD)  
**Cc:** Casey, Kathy  
**Subject:** Initial report regarding an incident of noncompliance

Dr. Wolff,

Attached is an initial report regarding an incident of noncompliance/suspension of privileges to conduct animal research at UCLA. The incident occurred at a UCLA animal research laboratory that receives funding from federal sources.

A final report from UCLA's Institutional Official will be forwarded to you upon resolution of the incident.

Please do not hesitate to contact me if you have any questions.

Kathy

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Kathy L. ~~Casey~~ *Wadsworth*  
Associate Director-Animal Subjects Research  
Office for the Protection of Research Subjects  
University of California, Los Angeles  
Phone: (310) 825-5227  
Email: kcasey@oprs.ucla.edu

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# MEMORANDUM

OFFICE FOR PROTECTION OF RESEARCH SUBJECTS  
Chancellor's Animal Research Committee  
2107 Ueberroth Building  
169407  
Phone: (310) 206-6308  
Email: [arc@opr.ucla.edu](mailto:arc@opr.ucla.edu)  
Website: <http://www.oprs.ucla.edu/animal>

August 25, 2005

Axel V. Wolff, M.S., D.V.M.  
Director, Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
Rockledge 1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, MD 20892-7982

Dear Dr. Wolff,

I am writing to provide you with an initial report pertaining to the Chancellor's Animal Research Committee's (ARC's) decision to suspend a research staff's privilege to conduct animal research at UCLA. The research staff in question worked in the laboratory of a Principal Investigator who receives federal funding for study ARC #1994-075, from the following two grants: 1) #NIH/NS22376 and #1R21 NS048124-01. The decision was made by the Committee at the convened meeting of August 22, 2005, based on the following:

On August 18, 2005, a veterinarian from the Division of Laboratory Animal Medicine (DLAM) notified the ARC of an incident occurring the morning of August 12, 2005, in which a research staff was alleged to have placed live pups in a latex glove to be euthanized. At that time, the veterinarian contacted the staff's Principal Investigator to comment on the matter and to ensure that her lab personnel are aware of the proper procedures for euthanizing animals. The Principal Investigator responded that there was "*a misunderstanding of what she was doing*" and that the mice were already dead before they were placed in the glove.

Upon further investigation, the veterinarian learned that other husbandry technicians had observed the research staff placing live pups in a glove during the week of August 1-5, 2005. The technicians took note of the incident, as the pups were moving inside the glove. The veterinarian notified the Principal Investigator August 17, 2005 of the aforementioned incident. The Principal Investigator stated in her response of August 18, 2005 that "on some occasions [the staff in question] did put some newborn pups into a glove and that they were alive at the time."

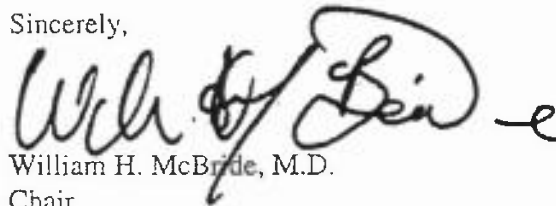
During the convened meeting of August 22, 2005, the ARC reviewed the incident, along with the investigator's response. The Committee acknowledged the Principal Investigator's response that the research staff was "sorry" and that she would "not place pups into a glove but would take them to the CO<sub>2</sub> tank promptly after separating from their mother." However, the Committee noted that the nature of the incident, combined with her admission of the prior incident described above, demonstrates a serious pattern of poor judgment and noncompliance, warranting suspension of the research staff's privileges to use laboratory animals.

The ARC forwarded correspondence to the Principal Investigator on August 23, 2005 and reminded her that the University, investigators, research staff, and the ARC share a collective responsibility for the ethical conduct of research at UCLA. The Committee further reminded the Principal Investigator that she is accountable for ensuring that all personnel listed under her approved protocol(s) perform their duties in accordance with the aforementioned regulations and policies, and that continued failure to adequately monitor her personnel may result in suspension of her animal research.

The ARC informed the Principal Investigator that the Committee would consider reinstating the research staff's privileges, pending successful completion of a course of retraining and reeducation in the care and use of laboratory animals, as described in a corrective action plan to be submitted to the ARC for review and approval prior to initiation.

A final report, signed by our Institutional Official, will be sent to your office following complete resolution of this incident. If you have any questions, please contact Associate Director Kathy L. Casey at [kcasey@oprs.ucla.edu](mailto:kcasey@oprs.ucla.edu) or call (310) 825-5227.

Sincerely,

A handwritten signature in black ink, appearing to read "William H. McBride", followed by a horizontal line.

William H. McBride, M.D.

Chair

On behalf of the Chancellor's Animal Research

Committee

cc: Kathy L. Casey, Associate Director - Animal Subjects Research

