



National Institutes of Health
National Institute of Allergy
and Infectious Diseases
Bethesda, Maryland 20892

May 4, 2023

Dr. Sócrates Herrera Valencia
Director and Principal Investigator
Caucaseco Scientific Research Center
Carrera 37 2 BIS # 5E - 08 OF 201
Cali, Colombia 760042

Dear Dr. Herrera Valencia:

The NIH National Institute of Allergy and Infectious Diseases (NIAID) is writing to Caucaseco Scientific Research Center (CSRC) to request additional information in response to your letter dated April 14, 2023, regarding compliance with awards 5R01AI148843-04 and 5U01AI155363-03 and continued research with non-human primates and mice.

NIAID is requesting the following information:

- Provide a clear and thorough timeline to include notifications to NIAID specific to activities associated with the January 16, 2023 suspension.** In your response to NIAID's question "1. As noted in your response, the research activity involving non-human primates at FUCEP was suspended on January 16, 2023. Why was this not reported to NIAID in a timely manner?", CSRC stated that it has kept NIAID informed and references: an in-person discussion with NIAID on January 4, 2023; messages from lawyers to NIAID and NIH on February 8, 2023 and March 23, 2023; and a teleconference with NIAID on February 13, 2023. It is unclear how the stated communications are associated with the suspension on January 16, 2023. For example, the referenced January 4, 2023 in-person discussion occurred prior to the suspension, and the stated messages from the lawyer and teleconference occurred over three weeks after the suspension. Also, the referenced January 4, 2023 meeting was to provide an update on malaria vaccine development; however, NIAID inquired about the PETA investigations and released photos, licenses, Corporacion Autonoma Regional del Valle del Cauca (CVC) inspection status, and CSRC organizational structure. In addition, NIAID received email communication on February 6, 2023 indicating that CVC had to temporarily stop the non-human primate (NHP) experiments but the communication did not mention that the NHP colonies were being seized, and a team meeting was held on February 14, 2023 on scientific progress where the Program Director/Principal Investigator (PD/PI) confirmed there was no immediate need of NHPs.

Please provide a response by May 15, 2023.

2. **Verify compliance with the terms and conditions of award which include compliance with applicable laws, regulations, and policies of local jurisdictions.** In response to NIAID's question "4. Are all research activities using animals (regardless of the animal species) still active at the CSRC site?", CSRC stated that the NIAID-sponsored projects comply with the terms and conditions of the award. However, in a letter dated April 19, 2023 from Myriam Arevalo-Herrera, Ph.D. addressed to the NIH Office of Laboratory Animal Welfare (OLAW), it is stated that research continued prior to license renewal because CVC's slow response to the license renewal application and because CSRC was confident the license would be reissued. Per the [NIH Grants Policy Statement \(NIHGPS\) 4.1.1.4 Foreign Recipients and Foreign Performance Sites](#), foreign recipients must provide OLAW with an Animal Welfare Assurance for Foreign Institutions, and this constitutes institutional assurance and certification of compliance with the applicable laws, regulations, and policies of the jurisdiction in which the research will be conducted, and a commitment to follow the International Guiding Principles for Biomedical Research Involving Animals. Therefore, NIH policy requires that recipients must also comply with applicable laws of its local jurisdictions. NIH may disallow costs due to noncompliance with award terms and conditions.

In addition, CSRC states that animal studies related to award 5U01AI155363-03 are continuing as planned at the Johns Hopkins School of Public Health. As a reminder, per [NIHGPS 4.1.1 Animal Welfare Requirements](#), costs for activities with live vertebrate animals may not be charged to NIH if there is not a valid Animal Welfare Assurance approval of the activity, and if the prime recipient does not have an Assurance and the animal activities will be conducted at an Assured institution named as a performance site, the recipient must obtain an Inter-institutional Assurance from OLAW.

Please provide a response by May 15, 2023.

3. **Provide a revised research plan by June 1, 2023.** In response to NIAID's question "6. Provide a revised long-term research plan (rather than describing the temporal solution). It does not seem possible that animal studies (at least the non-human primate studies) will be resumed soon at the CSRC site.", CSRC requested a few months for a revised long-term research plan and were considering potential alternatives of other collaborative centers in countries like Panama, Peru, and Brazil. NIAID is requesting CSRC submit a revised research plan by to NIAID no later than June 1, 2023. In addition, if CSRC includes in its plan to move towards alternative collaborators (e.g., Panama, Peru, Brazil), it must ensure the requirements set forth in the [NIHGPS 4.1.1 Animal Welfare Requirements](#), including an Inter-institutional Assurance, are met.

The research plan must provide progression and obstacles of approved project activities, including ongoing non-animal research activities and activities that cannot be completed and consideration of those that may require prior approval for a change in scope in accordance with [NIHGPS 8.1.2.5 Change in Scope](#).

- For 5R01AI148843-04, the overall goal is to determine the vaccine potential of *P. falciparum* and *P. vivax* erythrocytic synthetic polyepitope constructs containing α -helical coiled-coil motifs. In the latest Research Performance Progress Report (RPPR), it was indicated that a poly-epitope construct containing three *P. falciparum* α -helical coiled-coil motifs was built and tested in two NHPs and showed no efficacy.

- The future plan appears to rebuild the construct or use different adjuvant for animal immunization, and further characterize immune responses with samples from previous animal studies or human PBMCs. The plan must explain the research noted above since the animal studies already yielded negative outcome, and CSRC's plan to complete those research activities if the animal component is removed from the grant.
- For 5U01AI155363-03, the overall goal is to accelerate *P. vivax* vaccine development by identifying and characterizing classical and novel vaccine candidates with confirmed protective efficacy in animal models (mouse and NHP) that could be further advanced to clinical development. It is our understanding that the PD/PI is currently making vaccine constructs and developing the mouse model.
 - The future plan must explain what research activities towards the stated aims of this award will continue, and CSRC's plan to complete these activities, if the animal component is removed from the grant. For example, will the only remaining research be constructing new vaccine candidates without being able to confirm and prove their potential as vaccine candidates? Will alternative approaches to replace or conduct animal studies be proposed?

Alternately, if CSRC is unable to propose plans for either or both active awards to achieve the stated aims if the animal component is removed, then CSRC may also request bi-lateral termination of the award(s). In this case, NIAID would request CSRC detail the timeline and costs necessary for the orderly closeout of the project(s).

Please respond to the requested information by the dates noted above. If there are any questions, please contact me at emily.linde@niaid.nih.gov.

Sincerely,

Emily Linde
Chief, Grants Management Program
NIAID, NIH

cc: Dr. Annie Mo, Program Officer