

### **Exception to the Standards of the Animal Welfare Act**

The Institutional Animal Care and Use Committee (IACUC) of the University of Houston granted a temporary exception to the sanitation requirement for nonhuman primate indoor primary enclosures ("Indoor primary enclosures must be sanitized at least once every 2 weeks and as often as necessary to prevent an excessive accumulation of dirt, debris, waste, food waste, excreta, or disease hazard") from 5 May to 14 August, 2020.

After careful review of the justification provided, the animal care staff of the Animal Care Operations (ACO) office was granted IACUC approval to extend the change-out interval for resident nonhuman primate (NHP) cages from 14 days to 28 days. Justifications provided by ACO and considered by the IACUC included:

- The need to provide social distancing for ACO staff in the cagewash area
- The need to limit time within the NHP rooms during the COVID-19 pandemic
- These needs were considered essential for the health of ACO staff and the NHPs
- A plan was provided to convert back to 14-day change-out intervals once it was deemed safe to do so

Thus, during the aforementioned time frame (approximately 14 weeks), the animal facility (and, therefore, the institution) was not in compliance to the letter with §3.84(b)(2), which states that "Indoor primary enclosures must be sanitized at least once every 2 weeks." However, this item goes on to refer to "and as often as necessary to prevent an excessive accumulation of dirt, debris, waste, food waste, excreta, or disease hazard." This latter aspect was still enforced in the facility throughout the time period in question. In addition, the facility was compliant with §3.75(c)(3) ("Hard surfaces with which nonhuman primates come in contact must be spot-cleaned daily and sanitized ... to prevent accumulation of excreta or disease hazards"), and all other sections of the Animal Welfare Regulations related to NHPs.

For fiscal year 2020, a total of 42 adult macaques were variously affected by these exceptions. As indicated above, all NHPs are now back on the routine 14-day schedule, as of 14 August 2020.