



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

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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

August 27, 2021

Re: Animal Welfare Assurance  
A3464-01 [OLAW Case 11H]

Mr. Joe Giffels  
Associate Vice Provost  
University of Washington  
Research Administration and Integrity  
4000 15<sup>th</sup> Ave NE Box 351202  
Seattle, WA 98195-6355

Dear Mr. Giffels,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your August 10, 2021 letter providing further details on your Department of Comparative Medicine (DCM) plan for preventing adverse events involving cages without food or water. According to the information provided, OLAW understands that you have implemented the following measures:

DCM staff has made the change to add food in the receiving room, rather than in the animal room, and is in the process of evaluating this change to determine if it helps avoid the issue that occurred; DCM management has implemented initial training and re-training of animal care staff on how to adjust the lights in the animal rooms, increased awareness of removing cloudy cages, and storing spare cages on racks in a standard orientation in an effort to make it easier to note when cages are missing food or not engaged in the rack; DCM has also continued to heighten the awareness of attention to detail by animal care staff and the researchers in the facility through use of the "mystery cage" program. In this program, a cage is put in a room with "fake mice" and with some abnormality (no food, not seated properly, etc.). Anyone who notices the cage on that day receives a reward. Subsequently, if a health check has taken place without the animal care technician noting the cage, then they are re-trained.

In addition to the above, previously implemented measures, you have also taken further steps to address the issue:

DCM has also started a pilot study in one animal facility where food will be added to empty clean spare cages prior to their placement on the housing rack. This should ensure that food is in every new clean cage; however, researchers and animal care staff will also continue to be reminded to check food levels and ensure a water source each time a cage is handled.

OLAW believes that the above preventive measures put in place by the University of Washington are consistent with the provisions of the PHS Policy on Humane Care and Use of Laboratory Animals. These reasonable changes to your program should help to reduce the frequency of incidents related to animals being found without adequate food or water. 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: 2021.08.27 12:16:50 -04'00'

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

cc: IACUC contact

**W** OFFICE OF RESEARCH  
UNIVERSITY of WASHINGTON

August 10, 2021

Dr. Brent Morse olawdco@od.nih.gov  
Office of Animal Welfare, NIH  
6700B Rockledge Drive, Suite 2500, MSC 6910  
Bethesda, MD 20892

Re: Additional follow up on self-reported adverse events for A3464-01

Dear Dr. Morse,

Detailed below are further details on the Department of Comparative Medicine (DCM) plan for preventing adverse events involving cages without food or water.

Previously outlined prevention plan is on-going and includes:

DCM staff has made the change to add food in the receiving room, rather than in the animal room, and is in the process of evaluating this change to determine if it helps avoid the issue that occurred here. DCM management has implemented initial training and re-training of animal care staff on how to adjust the lights in the animal rooms, increased awareness of removing cloudy cages, and storing spare cages on racks in a standard orientation in an effort to make it easier to note when cages are missing food or not engaged in the rack.

DCM has also continued to heighten the awareness of attention to detail by animal care staff and the researchers in the facility through use of the "mystery cage" program. In this program, a cage is put in a room with "fake mice" and with some abnormality (no food, not seated properly, etc.). Anyone who notices the cage on that day receives a reward. Subsequently, if a health check has taken place without the animal care technician noting the cage, then they are re-trained.

Additional preventive measures:

DCM has also started a pilot study in one animal facility where food will be added to empty clean spare cages prior to their placement on the housing rack. This should ensure that food is in every new clean cage; however, researchers and animal care staff will also continue to be reminded to check food levels and ensure a water source each time a cage is handled.

Please let us know if you need additional information.

Sincerely,

(b) (6)

Joe Giffels  
Institutional Official  
Senior Associate Vice Provost for Research Administration and Integrity

Cc Kim Stocking  
(b) (6)

G80 Gerberding Hall Box 351202 Seattle, Washington 98195-10202  
206.616.0804

## Morse, Brent (NIH/OD) [E]

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**From:** OLAW Division of Assurances (NIH/OD)  
**Sent:** Wednesday, August 11, 2021 11:36 AM  
**To:** Morse, Brent (NIH/OD) [E]  
**Subject:** FW: Follow up letter D16-00292-A3464-01  
**Attachments:** Follow up letter A3464-01.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good morning Brent,

I am forwarding this to you because the letter sent is addressed to you. Please let me know if I should direct this to someone else.

Thanks!

Sandy Tang, B.A.  
Program Analyst (Contractor), Division of Assurances  
Office of Laboratory Animal Welfare  
National Institutes of Health  
6700B Rockledge Drive, Suite 2500, MSC 6910  
Bethesda, Maryland 20892-6910  
(301) 496-8287  
[Sandy.Tang@nih.gov](mailto:Sandy.Tang@nih.gov)

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**From:** Kim Stocking <kstock@uw.edu>  
**Sent:** Wednesday, August 11, 2021 9:44 AM  
**To:** OLAW Division of Assurances (NIH/OD) <olawdoa@od.nih.gov>  
**Cc:** Joe Giffels <jgiffels@uw.edu>; (b) (6)

**Subject:** Follow up letter D16-00292-A3464-01

Dear Dr. Morse

Please see attached requested follow up letter from the University of Washington (A3464-01).

If you have questions or need additional information, please let me know.

Regards,  
Kim

Kim Stocking, DVM, DACLAM

Attending Veterinarian

Director, Office of Animal Welfare

**Start Smart - Always Check Your Protocol Before Beginning Animal Work.**

Health Sciences Building Box 357160  
1705 NE Pacific Street Seattle, WA 98195-7160

(b) (6)

kstock@uw.edu/ oaw.washington.edu



*Dare 2 Care...* | explore UW's Compassion Fatigue Program



May 4, 2021

Patricia A. Brown, V.M.D., M.S., DACLAM  
Director  
Office of Laboratory Animal Welfare  
National Institutes of Health  
6700B Rockledge Dr.  
Ste. 2500, MSC 6910  
Bethesda, MD 20892

Via e-mail: brownp@od.nih.gov

Dear Dr. Brown:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 6.5 million members and supporters worldwide to request that in light of flagrant, ongoing violations of federal animal protection guidelines and regulations, the Office of Laboratory Animal Welfare (OLAW) withdraw its approval for the Public Health Service (PHS) Animal Welfare Assurance granted to the University of Washington (UW; PHS Assurance D16-00292 [A3464-01]).

The frequency with which similar instances of noncompliance have occurred at UW—and have resulted in the suffering and death of dozens of animals—only shows how meaningless the “corrective” and “preventive” actions taken by the university are. The minimum responsibility of ensuring that the animals housed in UW facilities have access to water and food has been ignored by its employees time and time again, and experimenters have disregarded approved protocols as if they were optional. UW has flouted animal protection provisions afforded by the *Guide for the Care and Use of Laboratory Animals* (“the *Guide*”) and the federal Animal Welfare Act (AWA) and has ignored the mandate of the PHS Policy on Humane Care and Use of Laboratory Animals (PHS Policy).

Documents obtained by PETA describe multiple incidents of noncompliance with the PHS Policy and several violations of the AWA that occurred from 2017 to 2021. Your own staff have received documents of the incidents summarized below, with final reports sent to OLAW on the dates specified:

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

Washington, D.C.  
1536 16th St. N.W.  
Washington, DC 20036  
202-483-PETA

Los Angeles  
2154 W. Sunset Blvd.  
Los Angeles, CA 90026  
323-644-PETA

Norfolk  
501 Front St.  
Norfolk, VA 23510  
757-622-PETA

Berkeley  
2855 Telegraph Ave.  
Ste. 301  
Berkeley, CA 94705  
510-763-PETA

Info@peta.org  
PETA.org

Affiliates:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Foundation (U.K.)

**May 26, 2020**

- Three rats who were subjected to spinal-injury surgeries died after staff members failed to administer the appropriate dose of xylazine. They used a concentration of 100 mg/mL instead of 20 mg/mL.
- Five mice died of asphyxiation after a staff member failed to dock their cage in the rack properly, leaving them with no airflow.
- Two rats died after staff members failed to follow the approved protocol and didn't monitor them after injecting them with parasitic larvae.

**March 24, 2020**

- Thirteen mice died from exposure to a high concentration of cigarette smoke after staff members failed to notice that the smoke machine wasn't functioning properly.
- Two mice died of dehydration and two more had to be euthanized after staff members failed to notice that their cage didn't have a water valve.

**February 24, 2020**

- Two monkeys confined in the Arizona facility got into a fight and sustained injuries after a transfer door failed, allowing them to get close to each other.
- A female gerbil was euthanized after a staff member failed to follow the approved protocol and tried to perform a second embryo transfer during a single surgical procedure.

**January 22, 2020**

Two mice died of dehydration after staff members failed to notice that the animals didn't have access to water because the "plastic hydropac® lixit ... had been chewed off."

**December 4, 2019**

- Two mice died and nine more had to be euthanized after staff members failed to administer the correct dose of influenza virus. Instead of 1,000 pfu, the animals received 1,000,000 pfu.
- Five male rats who were subjected to surgery sustained burns to their prepuces and one of them had to be euthanized after staff members failed to use a heating pad properly.
- Two mice died of dehydration after staff members failed to notice that they didn't have access to water.
- Three mice died and two more had to be euthanized after a staff member failed to add food to their cage and other members of the laboratory failed to notice.

**October 24, 2019**

- Fish were captured "via beach seine netting" by an "instructor" and his students who didn't have the required permit issued by the Washington Department of Fish and Wildlife.
- Ten young ferrets were exposed to successive impacts to their skulls using a higher force than that approved when staff members failed to follow the approved protocol. One of the ferrets had to be euthanized "due to prolonged anesthesia recovery after the 3rd exposure."

**April 10, 2019**

Six mice died or had to be euthanized after an experimenter failed to follow the approved protocol and administered a medication using an unapproved route.

**March 28, 2019**

Four pregnant bats were trapped “outside of [the] US” by a grad student who had failed to follow the approved protocol for pregnant individuals.

**February 27, 2019**

- One mouse died of dehydration and another had to be euthanized after staff members failed to notice that the water bottle in their cage had flipped, leaving them without access to water.
- Sixty mice were left without water for 12 to 15 hours and several of them died of dehydration when staff members failed to notice that the water line was disconnected.
- Wild birds were captured and transported “from the wild to the campus in a vehicle that had not been inspected by the IACUC” and were food-restricted when experimenters failed to follow the approved protocol.
- A female monkey confined in the Arizona facility had to be euthanized when her right arm was fractured after getting stuck in the mesh of her cage and the treatment that she was provided with failed to restore mobility to the arm and fingers.

**January 7, 2019**

- An adult mouse and “several litters” of baby mice drowned after a vendor engineer performed an unauthorized procedure in the water supply system and staff members failed to notice it.
- Thirty-three sablefish and 60 coho salmon died because of a failure in the main breaker panel that resulted in a power outage, which in turn caused the fish to have no oxygen supplied to their tank. The “circuit that failed controlled the water flow system, air pump, alarms and the back-up generator.”

**November 27, 2018**

- A rat was euthanized with expired euthanasia solution after staff members failed “to label the vial as expired and dispose of it properly.”
- A mouse had to be euthanized when he or she was found in a refrigerator after an experimenter failed to follow the euthanasia procedure, used only carbon dioxide, and didn’t use a secondary method.

**August 23, 2018**

- A 3-month-old mouse died—likely of dehydration/starvation—when his or her right arm was caught in the metal wire top of the cage. Staff members apparently failed to notice the situation in time to help the animal.
- Three frogs died after a staff member failed to place a baffle in their tank, which allowed them to escape.
- A bird died when he or she was trapped behind the cage pan and staff members failed to notice the animal “since the cage was high on top of a rack.”

**March 20, 2018**

A rat died after experimenters failed to follow the approved protocol, performed a surgery in which a mini pump was placed in his or her abdomen, and failed to provide the animal with adequate pain relief for an abdominal surgery.

**February 20, 2018**

- A primate had 28 ml of blood drawn when staff members failed to remember that the animal had blood drawn only 10 days before and failed to log this information in their tracking document.
- A juvenile frog was subjected to a survival axotomy when a laboratory member failed to follow the approved protocol.

**January 23, 2018**

- A mouse was left to die in pain after a staff member ignored for “several hours” an instruction to euthanize the animal.
- Four primates were subjected to biopsy procedures five days earlier than they should have been when experimenters failed to adhere to the approved protocol.
- Ten mice died and 12 more had to be euthanized when an experimenter failed to ensure that the correct doses of cancer chemotherapy drugs were administered to them. The animals received a higher dose that wasn’t adjusted for their bodyweight.
- A 4-month-old mouse died of dehydration when staff members failed to notice that his or her “headcap” had become caught in the “pellet hopper wiretop,” leaving the animal unable to access the water.

**December 8, 2017**

- Four mice died of dehydration when a staff member failed to dock their cage for water properly.
- A female mouse died when the veterinary resident failed to notice that she was sick and “had a uterine infection with two retained fetuses.”

**November 27, 2017**

Fish were subjected to surgeries performed by a staff member “who had not completed the surgical training requirements and was not certified.”

**November 17, 2017**

- Primates were left in unchanged cages for two days because of an elevator malfunction.
- Several mice confined to nine cages spent 19.5 hours in packing boxes before they were shipped.
- A 2-year-old male monkey didn’t receive enough food over the course of six weeks after an experimenter failed to notify the husbandry staff that he or she would stop feeding the monkey.

These documented violations and noncompliance issues are in addition to enforcement actions taken against UW. In 2011, the U.S. Department of Agriculture fined UW \$11,000 after a pigtail macaque starved to death. When she was found dead in her cage, she had

**Morse, Brent (NIH/OD) [E]**

**Sent:** Morse, Brent (NIH/OD) [E]  
 Wednesday, May 12, 2021 9:38 AM  
**To:** Walker, Keri (NIH/OD) [E]  
**Subject:** FW: Request regarding the University of Washington  
**Attachments:** 2021-05-04 Request\_to\_OLAW\_University\_of\_Washington.pdf

Hello Keri,

Please use this email and the attachment to open a new case and assign it to me. Thank you.

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

**From:** Brown, Patricia [OLAW] (NIH/OD) [E] <brownp@od.nih.gov>  
**Sent:** Tuesday, May 4, 2021 10:34 AM  
**To:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>  
**Cc:** Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>  
**Subject:** FW: Request regarding the University of Washington

Good morning Brent,  
 Please review and consider options for response.

Thanks,  
 Pat

Patricia Brown, VMD, MS, DACLAM (she/her)  
 Director, Office of Laboratory Animal Welfare,  
 Office of Extramural Research, Office of the Director, NIH  
 301-451-4209, [brownp@mail.nih.gov](mailto:brownp@mail.nih.gov)

**From:** (b) (6)  
**Sent:** Tuesday, May 4, 2021 9:03 AM  
**To:** Brown, Patricia [OLAW] (NIH/OD) [E] <brownp@od.nih.gov>  
**Subject:** Request regarding the University of Washington

Dear Dr. Brown,

I hope you and yours are doing well. Please find attached a request regarding the Public Health Service Animal Welfare Assurance granted to the University of Washington. Thanks in advance for your time and consideration.

Best regards,

(b) (6)

**Morse, Brent (NIH/OD) [E]**

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**Sent:** Brown, Patricia [OLAW] (NIH/OD) [E]  
Friday, May 7, 2021 4:49 PM  
**To:** (b) (6)  
**Cc:** Morse, Brent (NIH/OD) [E]  
**Subject:** RE: Request regarding the University of Washington

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

(b) (6)

This is to acknowledge receipt of your letter concerning the University of Washington. At this time your concerns are under review.

Sincerely yours,

Patricia Brown, VMD, MS, DACLAM (she/her)  
Director, Office of Laboratory Animal Welfare,  
Office of Extramural Research,  
Office of the Director, NIH  
6700B Rockledge Drive  
Bethesda, MD 20892-6910  
301-496-7163  
[brownp@mail.nih.gov](mailto:brownp@mail.nih.gov)



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**From:** (b) (6)  
**Sent:** Tuesday, May 4, 2021 9:03 AM  
**To:** Brown, Patricia [OLAW] (NIH/OD) [E] <[brownp@od.nih.gov](mailto:brownp@od.nih.gov)>  
**Subject:** Request regarding the University of Washington

Dear Dr. Brown,

I hope you and yours are doing well. Please find attached a request regarding the Public Health Service Animal Welfare Assurance granted to the University of Washington. Thanks in advance for your time and consideration.

Best regards,

(b) (6)

