



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) 480-3387

April 5, 2022

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

Sally Thompson-Iritani, DVM, PhD, CPIA, CCFP  
Associate Vice Provost  
University of Washington  
4000 15<sup>th</sup> Ave NE Box 351202  
Seattle, WA 98195-6355

Dear Dr. Thompson-Iritani,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your March 28, 2022 letter reporting a noncompliance with the PHS Policy on the Humane Care and Use of Laboratory Animals at the University of Washington. Your letter supplements the information in the prompt preliminary telephone report on January 21, 2022. According to the information provided, it is understood that from January 11-15, 2022, three individuals associated with a new lab began working with zebrafish. These individuals were not approved on the protocol and, though experienced in working with zebrafish, all individuals had not completed the basic training required by the University. This event was self-reported on January 18th. The animals in question were not supported by PHS funds.

Corrective and preventive actions included:

- (1) The PI clarified with the new faculty member the procedures that must be in place for fish work to occur.
- (2) An amendment was promptly submitted to add the new researchers to the protocol.
- (3) The PI has clarified with his team how personnel approval is verified. The facility manager will now explicitly confirm that personnel have been approved for animal work.
- (4) The new faculty member has also implemented a new process for onboarding new lab members before the individual can work with animals.

OLAW appreciates being notified by the University of Washington of this issue. Your reporting of this incident is consistent with the provisions of the PHS Policy on Humane Care and Use of Laboratory Animals for institutional self-monitoring, self-reporting, and self-correction. Although this activity was not PHS funded, the application of the expectations of the PHS Policy across the animal care and use program reduces any potential appearance of a double standard. We find no cause for further action by this office.

Sincerely,

**Brent C. Morse** -

Digitally signed by Brent C.  
Morse -S

Date: 2022.04.07 08:50:45  
+04'00'

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Brent C. Morse, DVM

Director

Division of Compliance Oversight

Office of Laboratory Animal Welfare

cc: IACUC contact



28 March 2022

Dr. Brent Morse [olawdco@od.nih.gov](mailto:olawdco@od.nih.gov)  
Office of Laboratory Animal Welfare NIH  
Rockledge 1, Suite 360, MSC 7982  
6705 Rockledge Drive  
Bethesda, MD 20892

Re: D16-00292 (A3464-01), Personnel Not Approved on Protocol

Dear Dr. Morse:

This is a final report on an adverse event reported to OLAW by (b) (6) in a telephone call on 1/21/22.

A new faculty member arranged for fish to be shipped and quarantined before he arrived. These fish were imported in September 2021 and placed on protocol 2997-01 during this transition period. From January 11-15th, three individuals associated with the new lab (2 postdoctoral fellows, lab manager), received a facility orientation and began to set up crosses to establish new lines of zebrafish. The individuals set spawning tanks and checked for eggs; no experimental procedures were performed on the zebrafish. These individuals were not approved on the protocol and, though experienced in working with zebrafish, all individuals had not completed the basic training required by the University of Washington (UW Animal Use Laws & Regulations, Animal Use Medical Screening). At the time of the incident, one individual had completed the basic training, one individual had only completed the Laws & Regulations course, and the third individual had completed neither of the required training elements. Once the PI became aware of the issue, he immediately reached out to the new faculty member and his staff to remedy the situation. This event was self-reported on January 18th.

The PI has taken several steps to address this issue:

- (1) The PI clarified with the new faculty member the procedures that must be in place for fish work to occur and is helping the new faculty member with submission of his own protocol.
- (2) An amendment was promptly submitted to add the new researchers to the protocol (all individuals have been approved to work on the protocol as of January 27th).
- (3) The PI has clarified with his team how personnel approval is verified. The facility manager will now explicitly confirm that personnel have been approved for animal work before facility training with a confirmation from the PI for new personnel. Personnel are not allowed to work with fish without facility training, so this is a reasonable checkpoint to ensure policies are upheld.

The new faculty member has also implemented a new process for onboarding new lab members, including a checklist to ensure all required training has been completed, verification by the lab manager that individuals have been added to the protocol, and final approval by the new faculty member before the individual can work with animals.

The IACUC reviewed the incident at its March meeting and found no further action necessary (considers the case closed). The animals in question were not supported by PHS funds.

Office of Research

1/11/2022

If you have questions regarding this situation or require additional information, please don't hesitate to contact me.

Sincerely,

(b) (6)

Sally Thompson-Iritani DVM/PhD, CPIA, CCFP  
Institutional Official  
Asst. Vice Provost, Animal Care, Outreach & 3Rs  
Clinical Associate Professor, DEOHS, SPH

Cc: Jane Sullivan

(b) (6)

accredit@aaalac.org

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Office of Research

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

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**From:** OLAW Division of Compliance Oversight (NIH/OD)  
**Sent:** Wednesday, March 30, 2022 7:32 AM  
**To:** (b) (6)  
**Cc:** OLAW Division of Compliance Oversight (NIH/OD)  
**Subject:** RE: Final report of 3 non-compliant events

Thank you for these reports, (b) (6) We will send responses soon.

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

**From:** (b) (6)  
**Sent:** Monday, March 28, 2022 4:44 PM  
**To:** OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>  
**Cc:** Jane Sullivan <jmsull@uw.edu>; Sally Thompson-Iritani <sti2@uw.edu>; accredit@aaalac.org; (b) (6)  
(b) (6)  
**Subject:** [EXTERNAL] RE: Final report of 3 non-compliant events

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and are confident the content is safe.

Please see the attached final report of 3 noncompliant events at the University of Washington. Please let me know if you have any questions.

(b) (6)



A3464-11R



## Initial Report of Noncompliance

By: (b) (6)

Date: 1/21/22

Time: 600

Name of Person reporting: (b) (6)

Telephone #: (b) (6)

Fax #:

Email:

Name of Institution: U of Washington

Assurance number: A3464

Did incident involve PHS funded activity? No

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

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

What happened?

Set up new zebrafish crosses but not on protocol

Species involved: zebrafish

Personnel involved: \_\_\_\_\_

Dates and times: \_\_\_\_\_

Animal deaths: \_\_\_\_\_

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

Reported to IACUC

Projected submission to OLAW of final report from Institutional Official: \_\_\_\_\_

OFFICE USE ONLY

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