



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 18, 2022

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

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

Dear Dr. Thompson-Iritani,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your March 31, 2022, letter addressing allegations against the Washington National Primate Research Center at the University of Washington (UW) made by an individual who wishes to remain anonymous.

It is understood the IACUC investigated each allegation, and their analysis has been provided for review by OLAW. The first allegation stated the AB Building has an issue with rodents, and the problem was not addressed until an USDA citation was issued. In response to this allegation, UW IACUC Chair states the rodent control plan for this facility has been revised and has been successful. It is noted that non-compliant items were not identified when the USDA visited this facility on November 8, 2021 and March 28, 2022. Also, the light fixtures were substituted for a model that is difficult for rodents to access and easy to clean. Furthermore, no evidence of rodents (i.e., mouse bedding or excrement) was detected during an IACUC visit to the AB building on March 4, 2022.

The second allegation includes a description of black mold that accumulates in the gaps between white PolyMax panels and metal framing of the enclosures in the new building. It was reported that caulking was missing due to removal by nonhuman primates, and that cleaning of the enclosures results in release of mold due to water spraying. In response, IACUC Chair reports there is no evidence of "black mold." However, these gaps are filled with materials such as food and feces from the pens and removed by frequent high-pressure washing. It is understood that samples were submitted from 3 different locations where gaps are prominent, which includes a sample from the gap-filling tape at the base of the pens and from the caulking that remains. The test results were not positive for "black" or "toxic" mold, but very few spores of *Cladosporium* species were detected from one sample. While re-caulking was considered, a feasible plan to prevent the animals from removing it again has not been identified.

The final allegation described the old building/AA as having lixit lines with suspicious water quality, and visible particulates in the water, which sometimes appears rust colored. Rust stains on the walls were also described by the anonymous individual. In response, the IACUC Chair states there was no evidence of inferior water quality during the semiannual site visit on March 4, 2022, and there was no evidence of rust particles in the water nor any unmovable rust stains on the walls. It is further stated that chlorine levels were tested at several points in the water lines and remain within acceptable levels throughout the recirculating system. Samples to assess water quality were submitted and involved running the water through filter paper and submission of pooled filtrate samples. While "background debris" was identified, no mold was detected and the debris present (i.e., cellulose fiber) did not include any concerning components.

OLAW requested a description of the sanitation program at the facility. Based on the documentation provided, this Office recognizes that animal technicians wear appropriate personal protective equipment when washing dirty cages. Animals are relocated prior to the cleaning of these areas which includes sweeping, removal of items (i.e., feeders), and large debris. During sanitization, water lines are flushed to ensure functionality and removal of any residue from the cleaning process occurs. Animals are given access to the newly cleaned area per the daily schedule.

OLAW requested a description of the rodent control program at the facility. Based on the documentation provided, it is acknowledged that an in-house Pest Control Officer services the animal colony, feed storage and office buildings. Various methods are used to control, trap, and eliminate a variety of pests (i.e., flies, rodents, etc.) that may be encountered in the facility while a pest control company services mostly non-animal areas. Logs are maintained on pest sightings and each time a pest control measure is taken, it is recorded.

Lastly, OLAW requested a description of how staff concerns are addressed regarding cleanliness/sanitation and animal health concerns. The documentation provided describes a step-by-step plan regarding what an individual should do when an unexpected event occurs. When a problem is reported, guidelines explain which individuals should be contacted and time frames regarding notification have been established to ensure a timely response. Instructions regarding what to do if a situation requires immediate assistance are identified, and the IACUC discusses each event to determine which events are reportable. Investigations are initiated when necessary and corrective actions are developed and implemented following the completion of investigations.

Thank you for the detailed responses to each of OLAW's concerns. This Office appreciates the prompt consideration of these matters by Washington National Primate Research Center at the University of Washington and for providing additional documentation with this report. This Office will not retain the standard operating procedures as part of the official record. We especially want to recognize your part as Institutional Official in providing transparency between your Office and OLAW.

We appreciate your cooperation regarding this matter and find no cause for further action by this office.

Sincerely,

Jacquelyn T.
Tubbs -S

Digitally signed by
Jacquelyn T. Tubbs -S
Date: 2022.04.18
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Jacquelyn Tubbs, DVM, DACLAM
Animal Welfare Program Specialist
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC Contact

March 31, 2022

Dr. Jacquelyn Tubbs

Senior Animal Welfare Program Specialist
Division of Compliance Oversight
Office of Laboratory Animal Welfare, NIH
6700B Rockledge Drive, Suite 2500, MSC 6910
Bethesda, MD 20892
olawdco@od.nih.gov

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

Dear Dr. Tubbs,

Please find attached a complete response to your letter dated February 11, 2022. As instructed an investigation avoiding Conflict of Interest was completed by our IACUC and their analysis and requested documents are included.

If you have any questions or require further information please let us know.

Sincerely,

(b) (6)

Sally Thompson-Iritani (she/her), DVM/PhD, CPIA, CCFP
Institutional Official, University of Washington Animal Care and Use Program
Asst. Vice Provost, Animal Care, Outreach & 3Rs
Clinical Associate Professor, DEOHS, SPH
(b) (6)/sti2@uw.edu

Cc Dr. Jane Sullivan, UW IACUC Chair
Dr. Thea Brabb, UW Attending Veterinarian

(b) (6)

W Office of Animal Welfare

March 30, 2022

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

Dear Dr. Thompson-Iritani,

Below are the results of my investigation into the circumstances surrounding the three allegations described in Dr. Tubbs' letter dated February 11, 2022.

- *A building referred to as "building AB" and known as the newest, all indoor building has an issue with rodents and "was totally neglected until citation by the USDA in an unannounced inspection" per the correspondence. Rodents reportedly nest on top of all the AB enclosures and there is infrequent checking of the secondary containment ceiling nets, where rodents reside. Light fixtures were reported to frequently contain mouse bedding and excrement and are cleaned infrequently as well.*

The rodent control plan for this facility was revised and has been successful. The USDA visited the AB Building on November 8, 2021 and March 28, 2022, and identified no non-compliant items on either visit. The University of Washington IACUC visited the AB Building on March 4, 2022 and found no evidence of rodents, such as mouse bedding or excrement, in the light fixtures or on the ground. All of these light fixtures were replaced recently with a model that is hard for rodents to access and easy to clean when needed. Relevant SOP is attached (SOP 1015 Vermin Control in AZ).

- *The new building contains black mold that accumulates in the gap between white PolyMax panels and metal framing of the enclosures. It is stated the gaps were filled with caulking but that is no longer present, which has allowed the mold to develop. When cleaning enclosures daily, water spraying into these gaps results in release of the mold on both sides of the enclosures.*

There is no evidence of 'black mold' in the new building. We submitted samples from 3 different locations where gaps are prominent, as well as a sample from the gap-filling tape at the base of the pens and a sample of some remaining caulking. None tested positive for 'black' or 'toxic' mold. We do

UNIVERSITY of WASHINGTON

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note that the gaps fill with all the substances that are normally present in the pens, including food and feces, but this is removed by frequent high-pressure washing with water and sanitization with disinfectant. We considered re-caulking to fill the gaps, but could not identify a feasible plan to prevent the monkeys from removing it again. Relevant test results and SOP are attached (Mold Test Results and SOP 1059 Manual Cage Wash Process AZ).

- *The "old building/AA" is described as having lixit lines with suspicious water quality. These lines (reportedly used by vet staff and animal technicians) have visible particulates present in water and produces rust-colored water at times. It is also reported that "unmovable rust stains" are present on the walls surrounding the lixits and management has been notified, however the finding has not been addressed.*

There is no evidence of inferior water quality in these lines. During our semi-annual site visit on March 4, 2022, we did not find any evidence of rust particles in the water or 'unmovable rust stains' on the walls. We suspect that the 'rust-colored water' appeared transiently after water flow was stopped and turned back on, dislodging particles that had built up inside the lines, as commonly occurs following disruption of water lines.

To follow up further after our visit, chlorine levels were tested at several points along the water lines and remained at acceptable levels throughout the recirculating system. In addition, the Arizona staff collected 'first flush' water for ~1 min from several locations on two days, ran the water through filter paper and sent the pooled filtrate samples out for testing. No mold was detected, but some 'background debris' was present. Further characterization of these background particles was conducted and identified no concerning components, mostly cellulose fibers that likely came from the filter paper and some skin cells. Moving forward, Arizona staff will continue to monitor for particulates, submit them for testing when appropriate and replace components as needed. Relevant test results and SOP are attached (Water Quality Test Results, Water Quality Test Results Follow-Up Test, and SOP 1069 Animal Drinking Water System in AZ).

I also provide the following requested information:

- *A description of the sanitation program at the facility (i.e., frequency of cleaning, areas sanitized, etc.)* The relevant SOP 1059 Manual Cage Wash Process AZ is attached.

- *A description of the rodent control program at the facility.* The relevant SOP 1015 Vermin Control in AZ is attached.
- *A description of how staff concerns are addressed regarding cleanliness/sanitation and animal health concerns.* The relevant SOP 0145 Adverse Events is attached, along with a picture of the Reporting Concerns door sign that is posted throughout the facility.

Please don't hesitate to get back to me if you have any questions.

Sincerely,

 (b) (6)

Jane M Sullivan, Ph.D.
Associate Professor, Dept. of Physiology & Biophysics
Chair, UW IACUC



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February 11, 2022

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

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

Dear Mr. Giffels,

The Office of Laboratory Animal Welfare (OLAW) has received allegations of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Washington National Primate Research Center (WaNPRC) at the University of Washington. Please note that no supporting documents were provided, therefore, a summary of the details provided by the individual have been included in this letter. The allegations include the following:

- A building referred to as "building AB" and known as the newest, all indoor building has an issue with rodents and "was totally neglected until citation by the UDSA in an unannounced inspection" per the correspondence. Rodents reportedly nest on top of all the AB enclosures and there is infrequent checking of the secondary containment ceiling nets, where rodents reside. Light fixtures were reported to frequently contain mouse bedding and excrement and are cleaned infrequently as well.
- The new building contains black mold that accumulates in the gap between white PolyMax panels and metal framing of the enclosures. It is stated the gaps were filled with caulking but that is no longer present, which has allowed the mold to develop. When cleaning enclosures daily, water spraying into these gaps results in release of the mold on both sides of the enclosures.
- The "old building/AA" is described as having lixit lines with suspicious water quality. These lines (reportedly used by vet staff and animal technicians) have visible particulates present in water and produces rust-colored water at times. It is also reported that "unmovable rust stains" are present on the walls surrounding the lixits and management has been notified, however the finding has not been addressed.

As authorized under section V.A.4. of the PHS Policy, and as referenced in your Animal Welfare Assurance for Humane Care and Use of Laboratory Animals, OLAW is requesting that your institution provide an explanation of the circumstances surrounding the above concerns. Where possible, please provide information on the specific allegation and related corrective and preventive measures put into place. If information on the specific allegation is not available, please provide a short statement regarding your institution's policies. Additional information is requested on the following:

- Please provide a description of the sanitation program at the facility (i.e., frequency of cleaning, areas sanitized, etc.).
- Please provide a description of the rodent control program at the facility.
- Please provide a description of how staff concerns are addressed regarding cleanliness/sanitation and animal health concerns.

Page 2 – Dr. Giffels
February 11, 2022
OLAW Case A3464-11V

Please instruct the IACUC, avoiding any conflict of interest, to investigate these allegations and if substantiated, please provide further information regarding the incident(s) and all corrective/preventive actions, and if PHS, DHHS or NSF-funded, report the applicable grant or contract number.

We appreciate your cooperation and ask that you please provide the requested information, or an interim report, by **April 1, 2022**. Please contact me if I can be of assistance at 301-402-2081 or jacquelyn.tubbs@nih.gov.

Sincerely,

Jacquelyn
T. Tubbs -S

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Jacquelyn T. Tubbs -S
Date: 2022.02.11
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Jacquelyn Tubbs, DVM, DACLAM
Senior Animal Welfare Program Specialist
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC Contact

Ward, Joan (NIH/OD) [E]

From: Joe Giffels <jgiffels@uw.edu>
Sent: Friday, February 11, 2022 11:19 AM
To: Ward, Joan (NIH/OD) [E]
Cc: Sally Thompson-Iritani; Jane Sullivan
Subject: [EXTERNAL] FW: OLAW Case A3464-11V
Attachments: SIGNED Compliance Case WaNPRC at University of Washington 11V.pdf

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.

Dear Ms Ward,

With this email, I am copying the University of Washington's new Institutional Official for animal welfare, Dr Sally Thompson-Iritani. Sally will review and respond as you have requested. Please do not hesitate to contact either of us with any questions or concerns.

Joe

JOE GIFFELS
*Sr Associate Vice Provost
Office of Research
University of Washington*

From: Ward, Joan (NIH/OD) [E] <wardjoa@od.nih.gov>
Sent: Friday, February 11, 2022 6:31 AM
To: Joe Giffels <jgiffels@uw.edu>
Cc: Jane Sullivan <jmsull@uw.edu>
Subject: FW: OLAW Case A3464-11V

Dear Dr. Giffels,

Attached please find Dr. Tubb's initial response to OLAW case A3464-11V.

If you have any questions, feel free to contact us by phone or by e-mail.

Best Regards,
Joan

*Joan Ward
Program Specialist
Office of Laboratory Animal Welfare
National Institutes of Health
6700B Rockledge Dr., Suite 2500
Bethesda, MD 20892
301-496-7163
wardjoa@od.nih.gov*