



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare
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FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare
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Bethesda, Maryland 20817
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December 1, 2021

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

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) acknowledges receipt of your November 19, 2021 letter in response to the October 28, 2021 letter sent from this Office. This letter provides additional information requested by OLAW regarding allegations of noncompliance with the PHS Policy of Humane Care and Use of Laboratory Animals at the Washington National Primate Research Center (WaNPRC) at the University of Washington. These allegations were addressed to the Secretary of the U.S. Department of Health and Human Services in a letter from People for the Ethical Treatment of Animals (PETA) and referenced an article from the Arizona Republic.

It is understood that WaNPRC conducts routine screening for infectious pathogens and performs additional screening as warranted based on clinical signs. Semiannual health assessments of nonhuman primates (NHPs) include screening for tuberculosis, serologic testing for various enzootic primate viruses (i.e., SRV, STLV, SIV and herpes B virus); *Trypanosoma cruzi*; and *Coccidioides* if in Arizona or shipped from Arizona. It is also understood that animals seropositive for *Coccidioides* receive treatment. Per the request of an investigator or if animals exhibit clinical signs of possible infectious disease, they may be tested for *Campylobacter*, *Shigella*, *Salmonella*, *Cryptosporidium* and *Vibrio* by multiplex PCR or culture and treated as appropriate.

Regarding transportation, physical examinations are performed on animals to be transferred or transported to other animal facilities. It is stated NHPs with clinical evidence of infectious disease are not shipped, and all animals are screened for tuberculosis within 30d of shipment. It is noted that *T. cruzi* status is disclosed to any potential purchaser. Regarding compliance with state and local regulations pertaining to animal transfer or transport, it is understood the institution received a Notice of Correction in 2021. The notice pertained to errors made in interstate transport of NHPs. In response, a corrective action plan was implemented and involved individuals such as the State Veterinarian and the plan included the following:

- Development of a Standard Operating Procedure (SOP) for animal shipments, including those from Arizona to Seattle. Records and Logistics personnel and Veterinarians receive this SOP as part of their training requirement to be reviewed annually.
- Registration with Global Vet Link to prepare Certificates of Veterinary Inspection (CVIs) for future shipments. The institution has signed up with the office of the State Veterinarian to receive regulatory updates and will use group e-mails to ensure that they continue to receive the information particularly critical for staff turnover. The institution has implemented a procedure for annual check-ins with the State Veterinarian to confirm compliance with regulations.

- Reporting of all the animals that have positive titers for Valley Fever that were shipped from Arizona to Seattle in the Washington State portal has occurred. The institution will report any future cases as described in the SOP previously mentioned.
- Regular communication occurs with the Washington State Veterinarian to ensure that ALL reportable pathogens that animals are exposed to are properly reported and documented according to regulations and recommendations.

The letter states that the water consumed by the animals is pre-treated with low levels of chlorine and is confirmed to be clean and potable. Quarterly testing of well water has been occurring since 2014 and it is stated that elevated perchlorate level detection occurred in 2014 and 2016. In 2014, a sample was taken from a storage tank and a subsequent sample from the well that provides water to the Arizona Breeding Colony was tested and confirmed to be below the trigger level for institution's contingency plan. In 2016, elevated levels of perchlorate were detected and retesting of the well was conducted. It is understood a second test determined that carryover contamination in the lab of perchlorate occurred during the initial analysis. As a result, levels were in fact below the limit that would trigger the contingency plan to install an ion exchange filtration system. It is noted the Environmental Protection Agency has confirmed that since 2016, quarterly groundwater monitoring has not detected concentrations that exceed the trigger level.

OLAW appreciates the prompt consideration of these matters by the WaNPRC at the University of Washington in providing our Office with this letter. 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.

We appreciate being informed of these matters and find no cause for further action by this Office.

Sincerely,

Jacquelyn Tubbs, DVM, DAACLAM
Senior Animal Welfare Program Specialist
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC Contact
Robert M. Gibbens, DVM, Director, Animal Welfare Operations