



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare
Division of Assurances
6700B Rockledge Drive
Suite 2500, MSC 6910
Bethesda, Maryland 20892-6910
Home Page: <https://olaw.nih.gov>

FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare
Division of Assurances
6700B Rockledge Drive, Suite 2500
Bethesda, Maryland 20817
Telephone: (301) 496-7163

August 30, 2022

Re: Assurance D16-00292 (A3464-01)

Sally Thompson-Iritani, DVM/Ph.D., CPIA, CCFP
Assistant Vice Provost
University Of Washington - Seattle
4000 15th Avenue Ne - Box 357330
Seattle, WA 98195

Dear Dr. Thompson-Iritani:

On behalf of the Office of Laboratory Animal Welfare (OLAW) I would like to thank you and your staff for the hospitality extended to the site visit team during our inspection of the University of Washington – Washington National Primate Research Center Arizona Breeding Facility (WaNPRC AZ) on August 18, 2022. We would also like to thank the many staff who escorted us throughout our visit. We appreciated the behavior management services supervisor's detailed review of the environmental enrichment program; the description of how behavioral assessments are conducted, and interventions established to address potential stereotypies; the program of veterinary care, the sanitation program, and the facilities maintenance supervisor's presentation which thoroughly addressed questions and concerns regarding water quality/assessment including the water provided to the animals.

This visit was part of OLAW's ongoing program to review the adequacy and accuracy of institutional compliance with the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals (Policy) as described in the Animal Welfare Assurance. This site visit included a tour of all animal and support areas at the Arizona breeding facility and a review of documents.

We confirmed that colony animals are routinely screened for infectious pathogens (i.e., viruses, bacteria, parasites, etc.) based on clinical signs and employing use of multiplex PCR and serology. Thorough semiannual health examinations are conducted, including testing for tuberculosis. Also, a review of animal health records confirmed use of PCR testing and/or culture as diagnostic tools to address animals presenting with loose stool and in the formulation of treatment plans.

Regarding animal shipments, we verified colony animals from the Arizona breeding colony are tested for coccidioidomycosis (aka San Joaquin Valley fever found commonly in all arid regions of the Western Hemisphere), and titer results are shared with the receiving facility in advance of shipment. We commend the knowledgeable veterinary staff's professional handling of any manifestations in the nonhuman primates of this endemic disease, to ensure healthy animals for future research studies. It was also confirmed that the institution is registered with Global Vet Link for preparation of Certificates

of Veterinary Inspection and that all required documentation is in place for interstate shipment of animals.

A detailed review of the water quality testing results was provided by you, the Institutional Official, which addressed all concerns regarding detection of perchlorate levels in the water, frequency of testing and ongoing monitoring by state oversight agencies. It is acknowledged that the Environmental Protection Agency (EPA) does not currently regulate perchlorate in drinking water. However, the agency is committed to partnering with state co-regulators, Tribes, and communities to address perchlorate. While the EPA is not pursuing a drinking water regulation, the EPA's decision does not impact any state standards for perchlorate. Site visitors were informed the water source for WaNPRC AZ is Well No. 2 (PF-2), which is monitored quarterly for perchlorate levels. A Contingency Plan for Exceeding Perchlorate Concentration Threshold Limits at PF-2 has been provided to the Arizona Department of Environmental Quality. The contingency plan has established a Concentration Limit (CL) and a Trigger Level (TL). It is understood if the TL is reached, a commercially available ion exchange system will be installed. It is also understood that during installation, the water will be monitored monthly. If levels reach 90% of the CL, then fresh water will be trucked in to supply the facility. Site visitors reviewed and confirmed that quarterly test levels for PF-2 have not exceeded the TL for perchlorate levels. Based on review of this documentation regarding the perchlorate and the coccidioidomycosis issues, OLAW considers these matters closed, and will not pursue allegations regarding these matters, at this time.

A tour of the animal areas verified adequate sanitation of the primary animal enclosures and confirmed that mold was not present in these enclosures. Animal care staff were observed wearing appropriate personal protective equipment while cleaning the enclosures as described per the standard operating procedure on sanitation. We also verified the implementation of an integrated pest management program.

Additional program elements that were admirable included:

- an animal population which was obviously healthy and very well acclimated to the presence of humans (including strangers);
- the behavioral assessment and recordkeeping software program was noted for being easy to follow and detail oriented;
- veterinary, technical, and managerial staff members were personable, knowledgeable, and readily answered site visitor questions;
- a controlled substances program was confirmed to be compliant with Drug Enforcement Agency expectations;
- a clearly dedicated husbandry staff committed to the well-being of the nonhuman primates;
- an emergency/disaster plan with provisions in place (e.g., backup generators) to address extreme environmental conditions;
- a robust and well-documented environmental enrichment program which incorporates a variety of food treats, manipulanda, and climbing infrastructure to allow animals to exhibit species-specific behavior;
- an interstate animal shipping program compliant with all state and federal requirements;
- a robust social housing program which includes all animals except those temporarily separated for veterinary reasons;
- an effective occupational health and safety program which also extends to contractors providing services on the premises;

Items to be addressed:

- We strongly encourage the nonscientist and nonaffiliated Institutional Animal Care and Use Committee (IACUC) members to participate in the facility inspections at the WaNPRC AZ.
- We recommend consolidation of paper records and enhanced labeling of certain documents such as the environmental monitoring logs.
- Please ensure the Standard Operating Procedures (SOPs) are regularly updated (e.g., the Vermin Control SOP).
- Please ensure your institution is aware the PHS Policy states “Institutions may, at their discretion, represent the names of members other than the chairperson and veterinarian with program authority (see IV.A.3.) by using numbers or other symbols in submissions to OLAW. Sufficient information for OLAW to determine that all appointees are appropriately qualified must be provided. The identity of each member must be readily ascertainable by the institution and available to authorized OLAW or other PHS representatives upon request.”

I am pleased to report that the WaNPRC AZ is a commendable animal facility and site visitors did not identify any significant deficiencies with respect to the provisions of the PHS Policy.

Thank you again for hosting the site visit team and please provide an update on the status of the items to be addressed by **October 1, 2022**.

Sincerely,

Jacquelyn
T. Tubbs -S

Digitally signed by Jacquelyn T.
Tubbs -S
Date: 2022.08.30 14:29:47 -04'00'

Jacquelyn Tubbs, DVM, DACLAM
Senior Animal Welfare Program Specialist
OLAW, National Institutes of Health

cc: IACUC Contacts