

November 20, 2023

Aubrey Schoenleben, Ph.D., CPIA  
Interim Co-Director  
Office of Animal Welfare  
University of Washington  
Box 357160  
1705 NE Pacific Street  
Seattle, WA 98195

Dear Dr. Schoenleben:

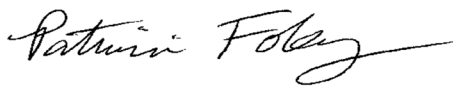
The AAALAC International Council on Accreditation has reviewed the report of the recent site visit to the University of Washington, Seattle, Washington. The Council commends you and the staff for providing and maintaining a high quality program of laboratory animal care and use. Especially noteworthy were the strong Institutional support for the program, evidenced in part by the creation of new leadership positions to support the program including the Assistant Vice Provost, Animal Care, Outreach, and 3Rs, and an Attending Veterinarian position separate from the Office of Animal Welfare (OAW), 3Rs pilot project awards up, development of novel outreach activities and the Dare 2 Care program, new cage wash equipment for the Arizona facility, and the SLU3.2 procedural space with extensive active scavenging system for waste anesthetic gas; the clean and well maintained centralized animal facilities and dedicated, knowledgeable and hard-working animal care staff who provided excellent animal care; the committed Institutional Animal Care and Use Committee (IACUC) with well-trained members that continued to fulfill its regulatory requirements and provide oversight of animal research despite significant challenges, and full involvement of the non-scientist and nonaffiliated members, and Continuing Education opportunities such as the Benefits story presented regularly at IACUC meetings; the impressive nonhuman primate program with exceptional veterinary support for both clinical and research procedures, detailed and comprehensive electronic medical records, and positive reinforcement training which allowed procedures such as cage-side ultrasound; the excellent training programs, evidenced in part by in-house developed online modules with incorporation of interactive training tools developed by an instructional designer dedicated to the program, the mock site visit training room, and the in-person training and certification programs for anesthesia, surgery and biosafety; the environmental enrichment program for all species, with enrichment provided to all rodents, extensive use of structural and food enrichment for nonhuman primates, foraging opportunities for the nonhuman primates at the Arizona facility, and kennels with porches for the dogs; the notably strong components of the occupational and environmental health and safety program, evidenced in part by Occupational Health Service/Environmental Health Service (EHS) posters and signage around the facilities and laboratories, inclusion of all personnel in the medical evaluation program and involvement in protocol reviews for risk assessments of hazardous agents, the Biosafety Level-3 training program, annual training for DCM staff, and the HAZWOPER response team; the excellent oversight of aquatics and the close working relationship between fish users and the DCM aquatic veterinarian; the active efforts to develop and maintain collegial relationships with the researchers, the veterinary teams, the DCM staff, and the OAW liaisons; the well-designed Veterinary Protocol Monitoring Program which provided opportunities to work closely and collaboratively with the researchers; the availability of behavior specialists and trainers; and the culture of the OAW and IACUC to facilitate animal studies and support the research community. The Council is pleased to inform you that the program generally conforms with AAALAC International standards as set forth by the *Guide for the Care and Use of Laboratory Animals*, NRC 2011. Therefore, considering the **CONDITION** described in the enclosure, which must be addressed, the criteria for maintaining **FULL ACCREDITATION** have been assured.

Council acknowledges receipt of the correspondence dated September 7 and July 14, 2023 detailing actions taken relative to concerns expressed by the site visitors during the exit briefing. Specifically, the items addressed satisfactorily included: reviewing timing of administration of SR buprenorphine versus type of anesthesia used to ensure adequate preemptive analgesia; ordering new cord pulls and signs indicating their location so that they will be clearly visible to individuals inside the rack washer; performing risk assessments for waste anesthetic gas exposure in locations identified by the site visitors, increasing WAG monitoring and education by EH&S and switching more laboratories to active scavenging systems; increasing efforts to expand the environmental sanitation monitoring program, retraining staff using the rack washer in Guthrie, and retraining staff that did not retest after samples failed; evaluating the feasibility of adding a sound barrier door in the corridor between the dog housing spaces and housing and procedure spaces for other species, and exploring the use of sound dampening panels/acoustic absorbers within the housing rooms; reevaluating protocols where provision of feed on the cage floor was approved and assessing alternative methods; working with facility services to adjust the number of air exchanges and/or differential pressure in spaces where these were not currently adequate or appropriate, and for facilities where correction was not possible or sustainable, evaluating their suitability for continued use as animal housing and procedure spaces and developing a strategy for closure of these spaces where appropriate, and increasing the frequency of cage changes in Guthrie as an interim measure; discussing updating the inter-institutional agreement with WERC and informing the WERC veterinarian of the importance of regularly reporting status updates to the Attending Veterinarian; updating the animal welfare concerns signage; providing more training both to researchers and to IACUC members on the expectations around the use and tracking of controlled substances, and what to look for when reviewing controlled substance documentation during an inspection; providing more outreach by OAW and EHS to various stakeholders, including facility staff and researchers, on various occupational health and safety risks (e.g., respiratory protection, gas cylinder storage, anesthetic waste gas monitoring), and providing consultation services by EH&S to assess occupational health risks and advise on appropriate controls, and working to identify spaces and activities that would benefit from more risk assessments; performing a comprehensive review of emergency and system support for all facilities, strengthening contingency plans for the facilities with vulnerabilities, exploring funding options to add or expand emergency power and redundant systems, and developing a strategy for closure of inadequate spaces where appropriate.

The Council directs your attention to the Condition listed in the enclosure and requires a written report of actions taken to correct the Condition within two (2) months from the date of this letter. Should you desire consideration by the Council at its next regular meeting, your response must be received no later than December 8, 2023.

AAALAC International requires an Annual Report detailing changes made during the year in accredited units. In the interim, AAALAC International expects to be apprised in a timely manner of significant programmatic changes or adverse events should they occur. Please note that, at your request, AAALAC International will provide your institution with a separate letter simply verifying that your animal care and use program is accredited.

Sincerely,



Patricia L. Foley, D.V.M.  
President, Council on Accreditation

PLF:cma  
000523

Enclosure

**University of Washington  
Seattle, Washington  
File # 000523**

**Condition that must be addressed:**

Expired and/or improperly labeled drugs, including anesthetics, analgesics, and euthanasia solution, were identified in numerous locations and in several cases these drugs were still in use. In one case, the site visitors found expired euthanasia solution that had also been identified during the last semiannual program review and was used twice for mouse euthanasia, including once after the issue was identified by the Institutional Animal Care and Use Committee (IACUC). Bottles of dilute euthanasia solution, dilute buprenorphine, and Baytril were not labeled with concentration and/or expiration dates and were in use 30 days beyond date of preparation. Tribromoethanol stock was identified that had precipitated out of solution in a conical tube. The *Guide for the Care and Use of Laboratory Animals*, NRC 2011 (p. 122) states that agents that provide anesthesia and analgesia must be used before their expiration dates. IACUC guidelines state that all agents must be labeled with concentration, date of preparation, and expiration date. The use of agents that are expired or are of unknown purity or concentration may impact animal welfare. The IACUC must ensure that agents are used and labeled according to its guidelines and are discarded prior to expiration and develop methodology to ensure that identified deficiencies are addressed as part of program review. Council acknowledges the correspondence dated September 7 and July 14, 2023 and efforts made to address this issue including creating a new IACUC policy on beyond use dating, developing new researcher training to emphasize expectations regarding expired substances, providing additional training to the IACUC, provision of new stickers to place on expired drug vials during semiannual inspections, adding additional follow up measures after a semiannual deficiency is identified, and reassessing the post-approval monitoring program. However, Council must receive documentation of these programmatic changes to assure that effective measures have been fully implemented to minimize the possible use of expired anesthetics, analgesics and euthanasia drugs.