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Office of Research Integrity
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To: House Committee on Emergency Management, General Government, and Veterans

Regarding: Opposition to House Bill 2904

Dear Chair Grayber and Members of the Committee,

I am submitting this written testimony following my oral testimony on March 9, 2023, at the public hearing for House Bill 2904. I am the Attending Veterinarian for the OHSU West Campus and Oregon National Primate Research Center (ONPRC). I have served in this role since July 2022. I also serve as Head of the Compliance, Education, and Training Unit for the Division of Animal Resources and Research Support, a group of approximately 150 highly skilled and extremely dedicated animal care staff. Before my current role, I was a veterinarian providing clinical care to animals and research support to the scientists at ONPRC in the Division of Pathobiology and Immunology since July 2012.

As the Attending Veterinarian, I am responsible for providing regulatory oversight for the animal care program and ensuring the animals receive appropriate veterinary care following the laws and regulations that apply to the use of animals in research. The position of Attending Veterinarian is required by a federal law called the Animal Welfare Act, which also requires research institutions to give the Attending Veterinarian the necessary authority to provide care to the animals. The law also requires that institutions conducting research involving animals have a standing committee called the Institutional Animal Care and Use Committee (IACUC). The IACUC is responsible for ensuring compliance with the Animal Welfare Act, and the Attending Veterinarian must be a member of the IACUC. The IACUC also ensures that the animal research program complies with other applicable laws and guidelines required by agencies that fund research.

I want to make clear that the ONPRC is recognized as an exemplary animal care program as it is fully accredited by AAALAC International, a private, nonprofit organization of experts in the care of laboratory animals. AAALAC promotes the humane care of animals in science by reviewing and accrediting institutions that participate voluntarily in the AAALAC assessment program, which involves intensive program reviews on a triennial basis. These reviews apply a thorough review of an extensive written description of the animal care program and an on-site visit to talk with staff and tour the facilities.

ONPRC's most recent AAALAC review was in 2022, and we received an exemplary review with continued full accreditation.

Contrary to what was presented during the public hearing by other witnesses, when unanticipated events impacting animal welfare occur, OHSU reports them to the appropriate regulatory agencies. I work with the IACUC and the animal care program to develop an appropriate response. When two rhesus macaques in our care tragically died in August 2020 due to a human error, I want the record to be clear about OHSU's extensive response. The animal care program conducted an intensive root cause analysis to identify any and all issues that may have contributed to the tragic event. The root cause analysis looked at the entire process associated with the tragic event, including training provided to the staff involved, the leadership of the group involved, and the techniques and workflow involved in the tragic event. The IACUC also investigated the event independent of the root cause analysis to ensure a complete review of the tragedy. Finally, OHSU invited outside experts to review the event and the entire animal care program and offer recommendations for improvement. ONPRC and OHSU leadership reviewed recommendations from all the investigations. As a result, they made fundamental changes in the organizational structure of the animal care program, which included leadership changes and additional support to improve the training program for the group involved in the event and the entire animal program.

During testimony, you heard the accusation that ONPRC had "31 violations of the Animal Welfare Act between 2014 and 2020", the most "violations of any nonhuman primate research institution." ONPRC posts all USDA inspection reports on its publicly available website, and the number used to make that accusation is inaccurate. It is also important to note that ONPRC is one of the country's largest primate research centers. Our record of animal care relative to other institutions is exemplary, as evidenced by our AAALAC accreditation, with nearly 5,000 animals being cared for daily, 365 days a year. As I previously described, we do have unanticipated events that may result in violations of the Animal Welfare Act, and we do not hide it. ONPRC independently notifies USDA when we suspect we have made a violation of the Animal Welfare Act and describes how we are addressing the issue.

In truth, OHSU sets the standard for communicating with the public when adverse animal welfare events happen. OHSU proactively notifies the public when serious welfare issues arise, as we did in the days following the tragic event in August 2020. We did not try to hide the event, as has been alleged. OHSU also freely provided the public with the results of the following internal investigations and the settlement agreement with the USDA's Animal and Plant Health Inspection Service. In summary, OHSU is far from a secretive organization as it has been described by those opposed to our work.

Importantly, I want to express my deep respect and support for the many men and women at ONPRC who care for the animals 24 hours a day, seven days a week, 365 days a year. I am continually impressed and inspired by their dedication to the animals. They provide outstanding animal care through all conditions, whether a few days of nasty weather or a global pandemic. They grieved for the loss of those two monkeys and then endured relentless criticism. I could not be prouder of our staff and their dedication to caring for the animals. They are true heroes.

Finally, I want to clearly express that I strongly oppose HB 2904 because it would require additional reporting that duplicates much of what is already required by the intense federal oversight we currently receive. The additional reporting would have no impact on improving animal welfare. Those opposed to animal research will attempt to use the information to end the irreplaceable contribution that animal research makes to the advancement of medical science. I implore you to recognize the intense oversight that ONPRC currently receives, and I am happy to address any questions you have.

Sincerely,

Jeffrey Stanton, DVM, MA, DACLAM

Attending Veterinarian – OHSU West Campus