



Animal Welfare Institute

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July 11, 2023

Council on Accreditation
AAALAC International
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Dear Members of the AAALAC International Council on Accreditation:

We are writing to express our profound concern regarding poor oversight of animals used in research at the University of Missouri – Kansas City (UMKC; Assurance Number: A3397-01). We believe that UMKC may have engaged in multiple, repeated, and allegedly ongoing violations of AAALAC's Rules of Accreditation, Section 2. Standards. Please be advised that the Animal Welfare Institute (AWI) submitted a formal complaint to OLAW, which the department upheld in part in December 2022. We now have new information regarding more recent alleged noncompliances. Given that these allegations regarding a woefully deficient IACUC strike at the very heart of animal welfare compliance, we urge AAALAC to investigate UMKC and take prompt action to ensure that these longstanding problems are fully and finally addressed.

There have been multiple reports, beginning in October 2020, of mice found dead from water deprivation, despite repeated written complaints to the IACUC documenting cages found with low water levels, or no water at all, including some that occurred shortly before the weekend. During this same time period, written complaints to the IACUC further documented cages found without food, mice left for days in flooded cages (with bedding so wet it had expanded to the point where mice had little space to move), new litters not being reported for days and sometimes weeks (resulting in severe overcrowding), cages dirty beyond acceptable levels, and inadequate training and staffing.

UMKC self-reported to OLAW a subset of these serious noncompliances at the time they occurred (e.g., October 14, 2020 and November 11, 2021). UMKC reported other noncompliances retroactively (December 1, 2022 for events that occurred in January 2021 and July 2022) – but only after OLAW requested they do so following a complaint letter that AWI filed with OLAW on September 12, 2022 (copy attached). Such retroactive “reports” fly in the face of *PHS Policy* mandates for self-reporting and make a mockery of the concept of self-regulation upon which OLAW and AAALAC (and the USDA) rely – let alone the animals at

UMKC and other institutions. Our complaint letter to OLAW alleged ongoing noncompliances, including mice found dead due to water deprivation. UMKC admitted to some of the allegations and OLAW closed the case on December 20, 2022. Since then, there have been yet more reports of alleged severe noncompliances.

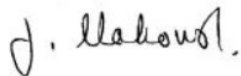
We are filing this with AAALAC International to ensure that you are aware of these adverse events that, if accurate, continue to undermine the notion of animal welfare oversight and the concept of accreditation. Given the longstanding nature of these alleged infractions, and the UMKC IACUC's allegedly repeated failure to address fundamental animal welfare requirements such as access to water, it appears that the UMKC IACUC should be reconstituted – and that there should be an external monitor. AAALAC has served as such a monitor in the past.

We also wanted to ensure you are aware of at least three instances of OLAW investigating UMKC over these critical alleged adverse events (October 14, 2020; November 11, 2021; December 1, 2022), in case they have not been reported to AAALAC International as required per your Rules of Accreditation.

It is concerning that, since 2019, the majority of USDA fines of research facilities have been against AAALAC-accredited facilities, including Envigo, whose accreditation AAALAC publicly defended just days before the May 18, 2022 raid. However, we truly hope that AAALAC will investigate the situation at UMKC and show the public that accreditation means something more than a rubber stamp.

Thank you, in advance, for your prompt attention to these acute long-standing issues. We look forward to hearing back from you soon.

Sincerely,



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