



United States Department of the Interior

U. S. GEOLOGICAL SURVEY
Reston, Virginia

In Reply Refer To:
Mail Stop 300
DTS #

Memorandum

To: Leon Carl, Midwest Regional Director

From: Anne Kinsinger, Associate Director for Ecosystems

Subject: Update on National Wildlife Health Center Internal Review

I am requesting that the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC) paperwork and subsequent mock inspection of the National Wildlife Health Center (NWHC) occur prior to the end of the AAALAC contract in September 2018.

A scientific integrity complaint¹ against the National Wildlife Health Center (NWHC) was filed with the Department of the Interior (DOI) in January 2017 by the Public Employees for Environmental Responsibility (PEER) as a result of deficiencies noted in a July 2013 NWHC Institutional Animal Care and Use Committee (IACUC) semi-annual inspection report. That report was submitted to the National Institutes of Health's Office of Laboratory Animal Welfare (OLAW), which reported "serious concerns about the ability of the NWHC to maintain an ongoing program of animal care and use that is compliant...." PEER urged USGS to "accede to international research accreditation for all of its research centers in order to prevent recurrence of these serious lapses" (i.e., external oversight by the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC). AAALAC accreditation would bring USGS on par with other federal agencies that are AAALAC-accredited (e.g., CDC, DoD, USDA, EPA) as well as biomedical university facilities. The scientific integrity complaint was aligned with a FOIA request and associated litigation from PEER related to NWHC animal care and use records (FOIA 2016-00018).

Because USGS's Director is the DOI Scientific Integrity Officer, meetings occurred at USGS headquarters to determine how to respond to this complaint. After an initial review of available documents, the USGS Director's office worked with the Midwest

¹ https://www.eenews.net/assets/2017/01/13/document_gw_04.pdf

Region and the Ecosystems Mission Area (EMA) to form a review team to go to NWHC. The team was charged with ensuring that issues raised in these complaints were adequately and fully addressed and deficiencies corrected to meet or exceed all operational standards for high-containment animal experimentation with wildlife diseases, including select agents. The report from that team was detailed in a March 9, 2017 memo (attached) to DOI titled "USGS Internal Review of the National Wildlife Health Center."

In parallel with the FOIA and scientific integrity complaint, EMA was seeking solutions to the failure of a drainage system in NWHC's biosafety level three (BSL-3) tight isolation building where animals are housed for experimental research. The need for NWHC modernization was detailed in an interagency 2017 report on high-containment laboratories produced by the Federal Experts Security Advisory Panel (FESAP)². FESAP, established by Executive Order 13546 in 2010, receives tasks from and reports to the National Security Council's Policy Coordination Committee on Biological Select Agents and Toxins. The USGS-relevant details were highlighted in a Feb. 10, 2017 memo to the USGS Director.

DISCUSSION

Seventeen recommendations from the USGS internal review team were reported back to DOI and detailed in the March 2017 memo. Based on the 10 August 2017 conference call, five recommendations have been resolved, four are in progress. Recommendation number 14, seeking AALAC accreditation for NWHC, was investigated by EMA staff. A contract was established with AAALAC for the performance of a mock inspection of NWHC in FY2018 with a period of performance ending in September 2018³. Such an inspection would allow for external reviewers to assess the progress made by NWHC on the recommendations that were not resolved as of August 2017. In order for AAALAC to proceed, NWHC needs to complete over sixty pages of paperwork and return the documentation to EMA. Prior to awarding of the contract, EMA informed the NWHC Center Director (CD), who is the Institutional Official, of the plan to have an AAALAC mock inspection.

The completion of this mock inspection will provide a third party (i.e., non-USGS) evaluation of NWHC as a follow-up to the 2017 DOI Scientific Integrity complaint. In addition to addressing those complaints from PEER, the mock inspection will provide recommendations to USGS on next steps to enhance NWHC's animal care and use program. This will also support a bureau response to the recent Government Accountability Office (GAO) audit focused on animal welfare (GAO report *In Progress*).

EMA staff recently visited NWHC (January 9-11, 2018) and noted the improvements following the repair of the drainage system and recent facility and equipment maintenance and repairs. Regarding the drainage system, USGS invested approximately \$5 million in FY2017 to maintain operation of existing infrastructure and estimates an additional \$14 million will be required over the next 5 years to keep the facility

² <https://www.phe.gov/Preparedness/legal/boards/fesap/Pages/default.aspx>

³ USGS Award G17PX01314 (September 13, 2017)

operational. In light of the significant investment, external oversight (AAALAC accreditation) is encouraged to ensure that NWHC animal research in that facility is compliant with that performed at other AAALAC-accredited federal facilities and biomedical universities.

Following the FESAP report on high-containment laboratories, EMA began exploring options for partnerships with other federal agencies (USDA, DHS, DoD) related to existing and future high-containment space needs by NWHC research-grade scientists. EMA also continues to investigate opportunities to partner with universities across the nation that have available modern BSL-3 space. EMA recently submitted a report (see attached) in response to 2017 Senate Appropriations language (S. 114-281) that details the facility options being investigated for infrastructure needs at NWHC.

Based on the information presented in this memo, I recommend that the Midwest Region ensure that the AAALAC paperwork and mock inspection of NWHC are completed before the contract ends in September 2018.

Attachments

1. March 9, 2017 titled "USGS Internal Review of the National Wildlife Health Center"
2. USGS Response to 2017 Senate Appropriations Report 114-281: Planning to support infrastructure needs at NWHC

