



June 16, 2026

Jacquelyn Tubbs, DVM  
Acting Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health

Via e-mail: [Jacquelyn.Tubbs@nih.gov](mailto:Jacquelyn.Tubbs@nih.gov); [olawdco@mail.nih.gov](mailto:olawdco@mail.nih.gov)

Dear Dr. Tubbs:

I'm writing on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 10.4 million members and supporters worldwide—to respectfully request that your office investigate the apparent failure by the University of Washington (UW; PHS Assurance ID D16-00292, A3464-01) Institutional Animal Care and Use Committee (IACUC) to report a noncompliance of PHS policy and the Guide.

On May 21, 2026 the UW IACUC held their monthly meeting. A [recording of a portion of the meeting](#) shows that UW's Office of Animal Welfare (OAW) reported that on February 24, 2026, a nonhuman primate assigned to protocol 4165-01, which PETA has learned is titled “Model for Chorioamnionitis and Preterm Labor” with Kristina Adams-Waldorf as the principal investigator (PI), received a higher-than-approved dose of recombinant IL-10 during a terminal procedure. According to the verbal report given by OAW Director Aubrey Schoenleben, the protocol authorized administration of approximately 8.5 micrograms, but the animal instead received 20 micrograms. The incident was attributed to use of an incorrect IL-10 preparation and inadequate verification of the approved dose. The IACUC subsequently voted to issue a Letter of Counsel to the PI.

Notably, during its discussion and resolution of this noncompliance, UW OAW did not indicate that the incident had been reported to OLAW. Because administration of an unapproved drug dose constitutes a significant deviation from an IACUC-approved protocol, PETA respectfully requests that OLAW determine whether this incident was reportable under PHS Policy and, if so, whether UW fulfilled its reporting obligations.

PETA further notes that, during the committee's discussion of this incident, several participants emphasized that the animal was undergoing a terminal procedure and therefore experienced no additional welfare consequences from receiving an unapproved dose. Committee members also referenced a November 2024 noncompliance in which primates in this PI's laboratory were administered an incorrect influenza virus strain for approximately two years due to a labeling error. According to UW's IACUC [meeting minutes from November 2024](#), that error resulted in at least one monkey developing severe pulmonary disease and

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being euthanized before the planned study endpoint. Human error was “suspected” and the IACUC voted to send the PI a Letter of Acknowledgement for reporting that they had injected the wrong virus into 10 monkeys. This incident was reported to OLAW and assigned as OLAW Case 14H.

Despite this history, during the May 21, 2026 meeting the IACUC discussion included consideration of resolving the matter through a Letter of Acknowledgment rather than a more formal corrective action. Ultimately, the committee voted to issue a Letter of Counsel. Notably, in response to IACUC member Elizabeth Soberg’s question—“Did they not read [the label]?”—UW Attending Veterinarian Christina Cruzen stated:

“I think there was a lot going on at this time for this particular lab group, and I think they just got a bit overwhelmed. Not that I'm making excuses, but... I don't know that it matters if they didn't read the label or if they didn't identify exactly which experiment the monkey was supposed to be on. To me, it's still a lack of attention to detail and/or poor communication about what was supposed to be done. And both need to be fixed.”

The recurrence of substantially similar errors by the same PI within a relatively short timeframe—here again involving a failure to verify what was being administered---raises serious concerns about the effectiveness of prior corrective actions and the committee’s evaluation of this deviation. The committee’s focus on the absence of immediate animal welfare consequences **in this instance** further underscores a concerning tendency to assess significance based on outcome rather than the underlying breakdown in protocol adherence. PETA therefore respectfully requests confirmation that UW reported this incident to OLAW if required under PHS Policy.

Thank you for your attention to this matter. Please let me know if additional information would be helpful.

Sincerely,

A handwritten signature in blue ink, appearing to read 'L. Jones-Engel', with a stylized flourish at the end.

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