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October 29, 2026

Board of Regents
University of Washington
Gerberding Hall, Box 351264
Seattle, WA 98195
via email: Regents@uw.edu

Subject: **UW's Internal Findings Put Federal Funding and Prior Representations About the Primate Center in Jeopardy**

Dear Regents,

The University of Washington is accepting money for research that its own officials may no longer be able to reconstruct or verify from the records maintained at its primate center. At the October 15, 2026, meeting of the Institutional Animal Care and Use Committee (IACUC), Attending Veterinarian Christina Cruzen and members of the IACUC disclosed systemic failures at the Washington National Primate Research Center (WaNPRC), including missing and inaccurate records, departures from approved procedures, interference with veterinary oversight and treatment, and serious harm to monkeys. Dr. Cruzen called for an independent audit to determine the extent of the record failures and told the IACUC that the review could take at least a year.

Those findings require UW to determine whether the failures affected research conducted under its sponsored awards and whether information subsequently reported to funders can be substantiated. UW policy makes clear that although principal investigators (PIs) conduct and manage the research, the grants supporting that work are awarded to UW, not to the individual investigators. UW accepts and administers those awards on the University's behalf.[1]

Yet UW is already seeking another five-year P51 award, before it knows the full extent of those failures, which federally funded projects may be affected, whether the reported irregularities rise to the level of fraud, or whether the records underlying that research can be relied upon.

We therefore urge you to work with President Jones to withdraw UW's application to the National Institutes of Health for the 2027–2032 P51OD010425 base operating grant, and to begin the process of closing the primate center and ending experimentation on monkeys at UW.

Findings disclosed to the IACUC include:

- UW cannot account for the integrity of WaNPRC's surgical and pathology records. The failures uncovered so far were serious enough that Christina Cruzen said she and Institutional Official Sally Thompson-Iritani considered the recordkeeping an "egregious failure" and concluded that only a full, independent audit by someone outside WaNPRC could

[1] UW Sponsored Awards: Acceptance and Fiscal Compliance https://research.washington.edu/research/policies/gim-2/

- determine its extent.[2] Cruzen told the IACUC that the audit could take at least a year, and the committee voted to reprimand the WaNPRC director and require quarterly reports on the audit's progress until it is complete.[3] In one case, UW may never be able to establish what occurred during a major neurosurgery because primary documentation is missing and the surgical record conflicts with other evidence. The necropsy report is also missing for the monkey subjected to a "best guess craniotomy"[4] on February 9, 2026.
- UW's own investigation found that resistance to veterinary authority has persisted for years. Veterinarians described repeated pushback from researchers when they sought to examine or treat monkeys, including cases in which PIs refused them access to animals or refused to permit treatment of infections. Some veterinarians said the resistance became so persistent and uncomfortable that they stopped initiating discussions or pressing for clinical interventions unless they were prepared to escalate the matter to the attending veterinarian or higher leadership. Research personnel also concealed activities from veterinary staff, including covering a laboratory door's window so staff could not see what was happening inside. The investigation also found that the researcher was not acting alone: the PIs she worked for supported her actions.
- UW's institutional leadership knew of these failures while the University was seeking renewal of the federal P51 Primate Research Center grant that supports WaNPRC and was undergoing the associated NIH site review. The Regents need a documented accounting of what senior officials knew, when they knew it, what corrective action they ordered, and what NIH reviewers were told about these problems during the P51 site visit in June 2026. The same question applies to AAALAC International, whose July 20–23 review included facility inspections and an in-depth examination of UW's animal-care policies, training, and documentation.

A more detailed discussion is provided below:

UW accepts and administers the federal and non-federal grants and contracts supporting WaNPRC and its investigators

UW's Office of Sponsored Programs is the university's authorized signing authority for sponsored-program proposals and awards, and the only UW office authorized to enter into sponsored-award agreements on the university's behalf. When UW signs for sponsored research, it puts the institution's name and authority behind that work. If UW cannot establish that the underlying records accurately document what procedures were performed, whether approved procedures were followed, what complications occurred, and what was found after animals died, UW cannot credibly stand behind the research or the representations used to obtain and retain the money supporting it. That applies not only to WaNPRC's NIH P51 infrastructure grant but to every federal, state, foundation, corporate, and other sponsored award that relies on work performed at the primate center. If UW sought, received, or retained funding based on representations that cannot be substantiated by accurate underlying records, the matter warrants investigation for research misconduct, false representations, and fraud.

An experimenter already under heightened scrutiny was allowed to perform a "best guess craniotomy"

In 2024, PI Fritzi Arce-McShane repeatedly irradiated a monkey named Brownie more frequently than her approved protocol allowed, failed to provide Brownie with the required protective goggles, and failed to alert veterinary staff of her actions.[5] Brownie suffered from radiation poisoning and was killed in September 2024. The USDA subsequently issued UW an Official Warning Notice based on those

[2] October 15, 2026 IACUC meeting, 1:41:05-1:43:07
[3] October 15, 2026 IACUC meeting, 1:47:45–1:50:21
[4] October 15, 2026 IACUC meeting, 51:57-52:09
[5] August 15, 2024 IACUC meeting, pp. 4-5

violations.[6] UW's own police later prepared to present probable cause for first-degree animal cruelty to the King County Prosecuting Attorney's Office. Arce-McShane's invasive work was halted for months by the IACUC. When UW allowed her to begin again, the IACUC authorized her to use one monkey as a trial under heightened veterinary monitoring because serious concerns remained.

On February 9, 2026, Arce-McShane's team and WaNPRC personnel began a major brain surgery on a macaque using a custom implant designed from MRI images that were approximately three years old. After the monkey's scalp had been opened, they discovered that the implant did not fit and that the planned robotic procedure could not be performed. The record described what followed as a "best guess craniotomy," with bone removed to force the chamber to fit.[7] Longer screws were used and postoperative imaging showed that the screws extended beyond the inner margin of the monkey's skull. The improvised manual approach prolonged the surgery, yet only three of the five planned electrode arrays could be implanted. Cruzen was not consulted before the surgery continued, though Thompson-Iritani and others were consulted in real time.

The monkey subsequently developed an acute infection that Cruzen attributed to the implant's poor fit. Two days after postoperative imaging, a WaNPRC behavioral management technician working with the monkey found fluid in the chamber and "detected a foul odor."[8] The technician was so disturbed by what she encountered that Cruzen later described her as "extremely upset" by "the odor of the implant, the amount of discharge and the odor."[9] UW has conflicting accounts of whether Arce-McShane's personnel had observed the fluid two days earlier and, if so, why they did not report it. The monkey was later killed at the end of the study. Months afterward, UW still could not establish who authorized the surgery to continue. UW also could not determine whether the excessively long screws entered the monkey's brain because the necropsy report needed to answer that question is missing.

UW's failures allowed an infection to destroy a monkey's skull and spread into his brain

In a separate case, a monkey known as Wolfgang had hardware permanently attached to his skull. These devices create openings and margins that require careful monitoring because infection can spread through damaged bone and into the tissues surrounding the brain. From 2023 to 2025, Wolfgang was handled daily by research personnel in the laboratory of Yoshiko Kojima and Robi Soetedjo, yet his records documented almost no problems with the implant site, an absence that Cruzen said was highly unusual.

By September 2025, a veterinarian documented pus around the implant. In October, laboratory personnel asked veterinarians not to clean the affected margins. Veterinarians complied with this unusual request. On December 2, during a routine cleaning by the laboratory personnel, a large mass of pus and infected material flowed out. Wolfgang immediately became unresponsive and rapidly deteriorated.[10] X-rays revealed extensive destruction of the bone surrounding the device, and the decision was made to kill Wolfgang. His necropsy showed that the infection had spread into his brain and surrounding tissues and that an abscess had formed inside his brain.[11]

Wolfgang was not simply being housed in the laboratory while this infection progressed. He was being used in neurological experiments in which his performance on behavioral tasks and the resulting

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[6] October 8, 2024 USDA inspection report, citing a critical violation of 9 C.F.R. § 2.31(e)(3)
[7] October 15, 2026 IACUC meeting, 51:34-52:02
[8] October 15, 2026 IACUC meeting, 53:09–53:27
[9] October 15, 2026 IACUC meeting,1:24:30–1:25:14
[10] October 15, 2026 IACUC meeting, 8:35-10:05
[11] October 15, 2026 IACUC meeting,10:06-10:23

research data were themselves experimental measures. The AV concluded that the infection "greatly preceded" the ten weeks documented in his veterinary record and suggested that changes in Wolfgang's behavioral performance may have been missed.[12] IACUC members specifically proposed going back through his research data to look for deterioration in the number of trials he completed or other changes in task performance, and questioned what the infection meant for the quality and scientific interpretation of the data collected from him.[13]

Principal investigators obstructed veterinary care and concealed laboratory activities

An IACUC subcommittee investigation substantiated years of resistance by research personnel to veterinary and WaNPRC Behavioral Management Services staff so persistent that some veterinarians said they had stopped trying to insist on clinical interventions unless they were prepared to escalate the dispute to the attending veterinarian or higher leadership.[14] The investigation also found that the researcher at the center of the complaint acted with the backing of PI leadership, which defended its pushback with the excuse of protecting research integrity and experimental aims.[15]

The investigation exposed an equally troubling barrier to basic oversight: research personnel kept others out of monkey rooms during regular working hours and covered the windows in the doors that prevented anyone on the outside from seeing what was happening inside.[16] Veterinary and behavioral staff warned that this could prevent them from detecting an animal who was ill or injured, a staff member in difficulty, or even an escaped monkey. The windows were uncovered only after the attending veterinarian became involved, and the subcommittee concluded that blocking them violated primate center policy.

UW's proposed remedy at the October 15, 2026, meeting included "reaffirming" the primacy of veterinary directives. Veterinary authority should never have become negotiable in the first place, and researchers should never have been permitted to block the view of the people responsible for monitoring animal welfare and safety.

UW cannot vouch for research that it cannot substantiate from its records

The missing necropsy report, following the "best guess craniotomy" in the Arce-McShane case, is one part of a broader failure whose full extent UW still does not know.[17] Attending veterinarian Cruzen has called the situation an "egregious failure of adequate surgical and pathology record keeping."[18] In at least one case, the records are so deficient that UW may never be able to establish even what surgery was performed. According to Cruzen, "I encountered errors that I believe represent a programmatic failure of adequate record keeping by the institute…by the primate center."[19] In one case, "the description of the surgery is not consistent with the protocol description and does not match post operative observations or post operative imaging."[20] Cruzen went on to describe "necropsy reports with significant errors of a similar nature, including incorrect project assignment noted, lacking descriptions of implants that we believe to be present, including descriptions of implants that were not present, and missing descriptions of key clinical conditions that were diagnosed prior to euthanasia in discussion with

[12] October 15, 2026 IACUC meeting, 29:28–30:30
[13] October 15, 2026 IACUC meeting, 35:21-36:53
[14] October 15, 2026 IACUC meeting, 2:08:35-2:09:36
[15] October 15, 2026 IACUC meeting, 3:00:40-3:00:46
[16] October 15, 2026 IACUC meeting 2:07:35-2:07:54
[17] October 15, 2026 IACUC meeting, 1:42:14-1:42:54
[18] October 15, 2026 IACUC meeting, 1:42:48
[19] October 15, 2026 IACUC meeting, 1:41:14-1:41:26
[20] October 15, 2026 IACUC meeting, 1:41:41-1:41:47

the institutional official."[21]And chillingly, Cruzen adds: "At this time we do not yet know the depth of these errors."[22]

The surgical records present similar concerns. In one case, the record of a major brain surgery consisted of an unedited template rather than an account of the procedure actually performed. The entry conflicted with the approved protocol, postoperative observations, and imaging, and UW may never be able to determine what was done. The AV and IO believe an independent audit is necessary precisely because UW does not know whether these are isolated records or examples of a wider programmatic failure.

Surgical, daily-care, pathology, and necropsy records establish what procedures were performed, whether they complied with approved protocols, what complications occurred, what treatment animals received, why they died, and whether findings later reported in publications or to sponsors can be substantiated. The inability to reconstruct a major surgery or rely on a necropsy report, therefore, has implications for both animal care and the integrity of the research record.

The IACUC identified failures that reach directly to UW leadership

The IACUC did not treat these as isolated failures by individual employees. It directed action at the PIs and WaNPRC leadership and called for center-wide changes. Responsibility for the center's animal oversight, operations, and federal core funding, therefore, sits squarely within UW's senior research leadership. Thompson-Iritani, UW's Institutional Official, was consulted while the improvised February 9, 2026, brain surgery, which resulted in surgical errors, was underway.[23] Cruzen, UW's Attending Veterinarian, subsequently investigated the surgery, the resulting infection, the missing necropsy, and the broader record failures. Cruzen and Thompson-Iritani jointly concluded that the surgical and pathology recordkeeping failure was egregious. WaNPRC director Deborah Fuller oversees the center whose systems failed. Ostendorf, principal investigator on WaNPRC's P51 base grant, is responsible for the Office of Research and serves as principal investigator on the P51 grant supporting WaNPRC[24]

An independent audit must examine the sponsored research built on these records

The independent audit cannot stop at identifying missing or inaccurate animal records. The Board of Regents needs to ensure that the audit determines whether missing, inaccurate, or unverifiable records affected grant applications, progress reports, publications, regulatory submissions, sponsor reports, or other representations made in connection with funded research. If UW sought, received, or retained funding based on representations that cannot be substantiated by accurate underlying records, the matter may extend beyond deficient recordkeeping to research misconduct, false representations, and potential fraud.

The audit must also establish what UW disclosed to NIH and other outside reviewers after these problems became known. That accounting is essential to determining whether federal funding was sought or maintained while UW possessed information that called into question the records underlying the research.

UW has confronted serious failures involving WaNPRC records before

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[21] October 15, 2026 IACUC meeting, 1:42:24- 1:42:48
[22] October 15, 2026 IACUC meeting, 1:42:54
[23] October 15, 2026 IACUC meeting,1:04:56
[24] National Institutes of Health, Office of Research Infrastructure Programs, Washington National Biomedical Research Center, Grant No. P51OD010425 Identifying Mari Ostendorf as principal investigator, Deborah Fuller as director, and Christina Cruzen as interim associate director, Animal Resources

In 2022, a King County Superior Court ordered UW to pay nearly $540,000 in fees and penalties after finding that the university failed to conduct adequate searches for WaNPRC records and maintained a policy of routinely destroying photographs and videos, making it impossible to comply with Washington's Public Records Act. Four years later, UW's own attending veterinarian is now warning that fundamental records of surgeries and necropsies may be inaccurate, missing, or impossible to reconstruct.

Regents should direct UW to take these steps immediately

The IACUC has called for an independent audit of WaNPRC's surgical and pathology records and was told that determining the scope of the problem could take at least a year. **UW should not continue experiments or seek another five years of P51 support while it remains unable to determine the extent of the failures, which research and awards may be affected, and whether the underlying records can substantiate the work.**

Specifically, we urge the board to:

1) Withdraw the 2027–2032 P51 application and decline any new P51 award while these matters remain unresolved. UW should not enter another five-year funding cycle before the independent investigation determines the scope of the failures and their effect on sponsored research.
2) Suspend experiments at WaNPRC while the investigation proceeds. Necessary veterinary care must continue, and the suspension must not prevent transfer, retirement, or sanctuary placement.
3) Preserve all relevant records and commission a genuinely independent investigation reporting directly to the Board. The investigation must extend beyond WaNPRC's surgical and pathology teams to the actions and knowledge of UW officials responsible for animal oversight, WaNPRC operations, research administration, and sponsored funding.
4) Identify every affected award and determine whether unreliable records affected UW's representations to funders. This review must cover federal and non-federal funding and determine whether inaccurate, incomplete, missing, or unverifiable information was used in grant applications, progress reports, publications, sponsor reports, regulatory submissions, invoices, or accreditation materials.
5) Provide a public accounting of what UW knew, disclosed, and allowed to continue. This must include what UW disclosed during NIH's June P51 site visit and the recent AAALAC review, when senior officials learned of the underlying problems, and what research and funding continued afterward.

Thank you,



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