



National Institute of
Environmental Health Sciences
Division of Translational Toxicology



Is It Safe? – Deriving a Point-of-Departure for Skin Sensitization

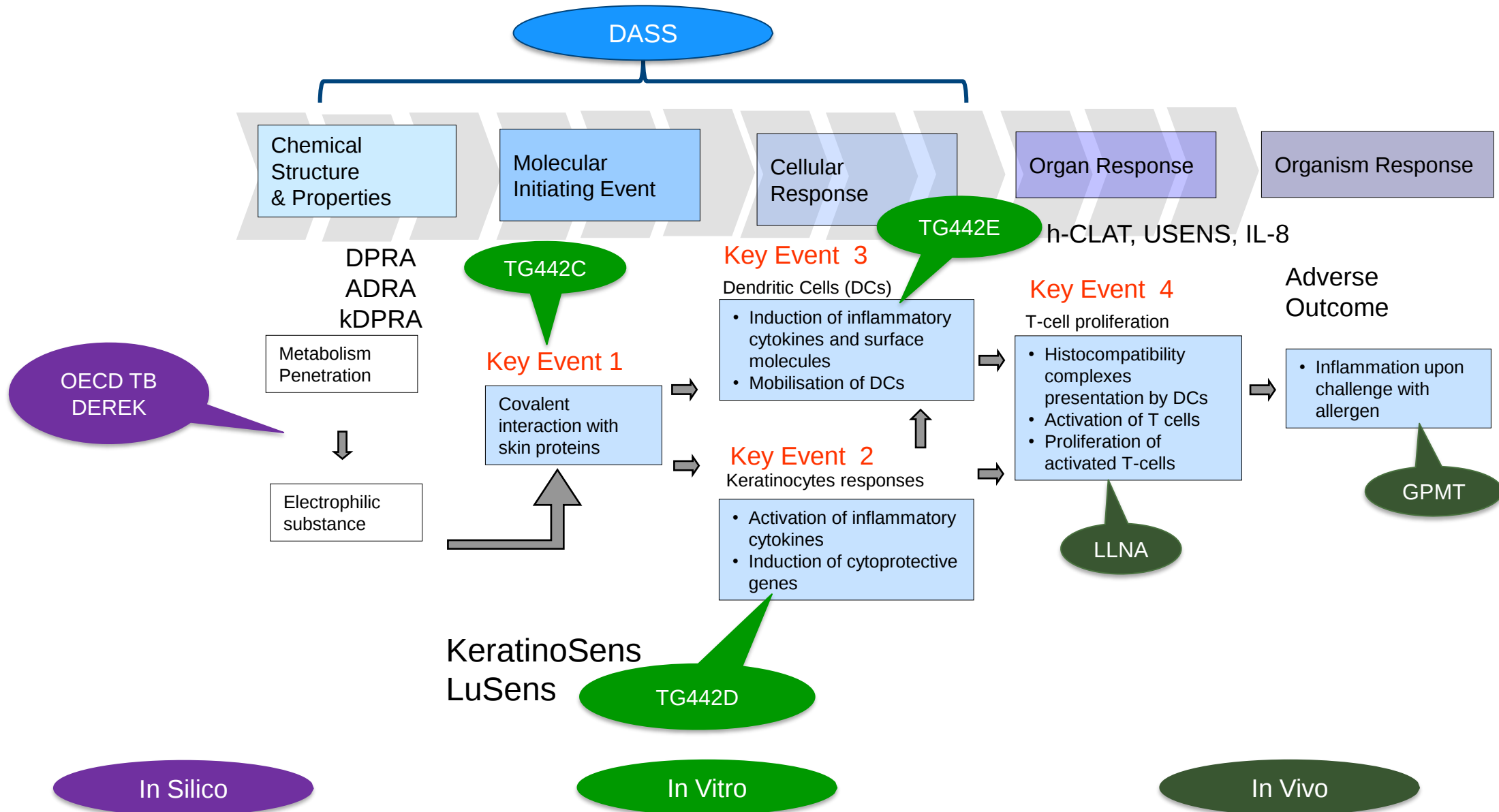
Emily N. Reinke, PhD, DABT

Inotiv, Inc., in support of National Toxicology Program Interagency Center for the Evaluation of Alternative Test Methods (NICEATM)

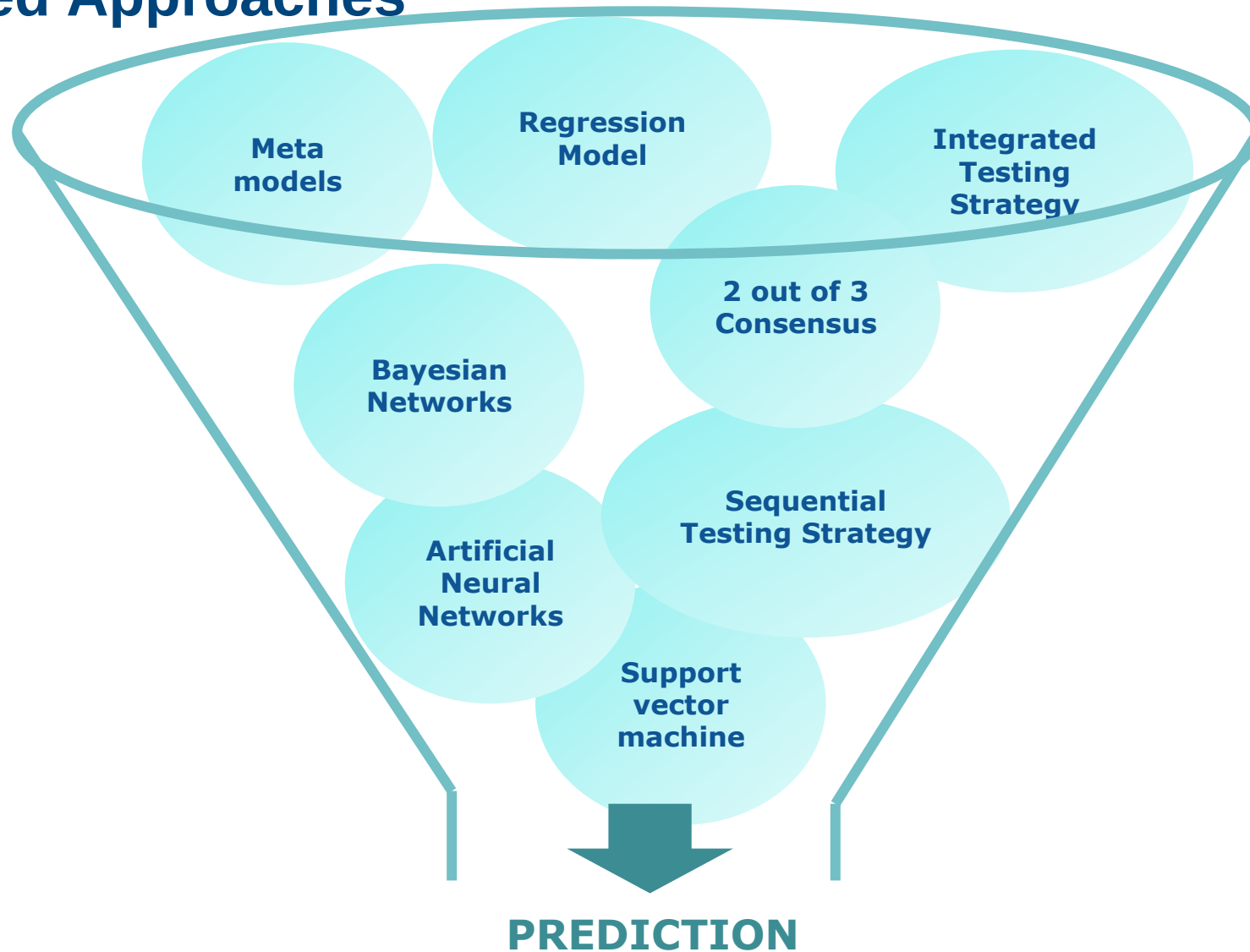
**EPIC Webinar Series
11 December 2024**

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Skin Sensitization: Biology-Mapped Methods

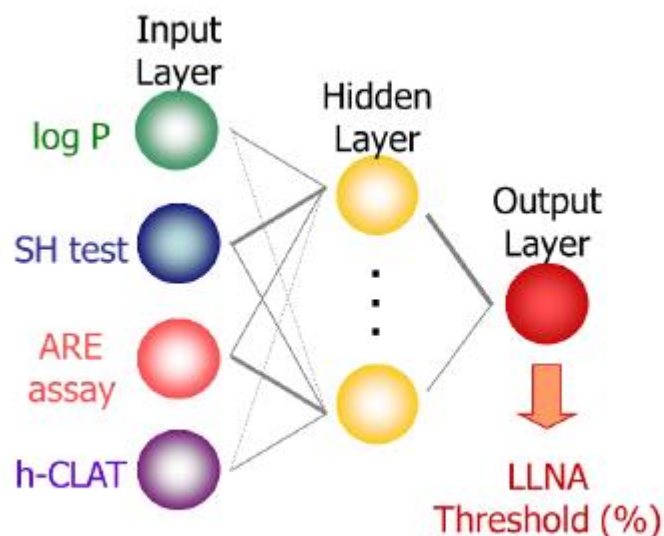


Types of Defined Approaches



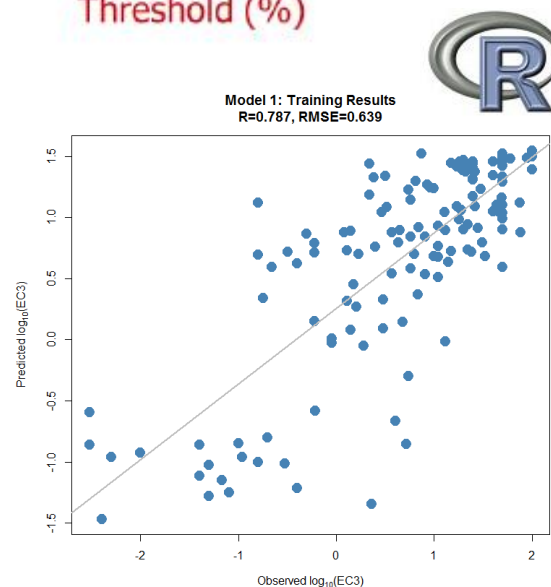
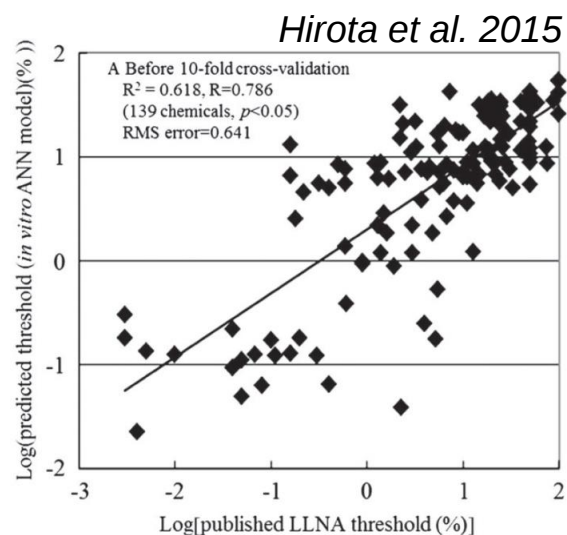
Current List of Available Defined Approaches for Potency

	Input	Output	Species	Conversion to dose/unit area?	Open source	Source	Regulatory Use
ITSv1/ITSv2	DPRA, h-CLAT, KeratinoSens, DEREK/OECD Toolbox	Potency Sub-category (GHS)	Human	N/A	Yes	(OECD, 2021)	GL 497
STS	h-CLAT, DPRA	Potency Sub-category (GHS)	Human	N/A	Yes	(EPA, 2018; Takenouchi et al., 2015)	EPA Interim Science Policy
BN-ITS3	DPRA, h-CLAT, KeratinoSens, TIMES-SS, bioavailability (solubility at pH 7, Log D at pH 7, plasma protein binding, fraction ionized)	pEC3 (Point of Departure)	Mouse	Yes	No	(Jaworska et al., 2015)	
Shiseido ANN	DPRA, h-CLAT, KeratinoSens/LuSens	EC3 (Point of Departure)	Mouse	Yes	Yes (Kleinstreuer et al., 2018)	(Hirota et al., 2015)	
2of3 Regression	Combination of: DPRA, kDPRA, h-CLAT, KeratinoSens/LuSens, Vapor Pressure	pEC3 (Point of Departure)	Mouse	Yes	Yes	(Natsch and Gerberick, 2022)	
SARA-ICE	Any combination of: HRIPT, LLNA, DPRA, kinetic DPRA, KeratinoSens, h-CLAT, U-SENS	ED01 (Point of Departure)	Human	Yes	Yes (in the future)	(Reynolds et al., 2022, 2019)	Under evaluation for addition to GL 497



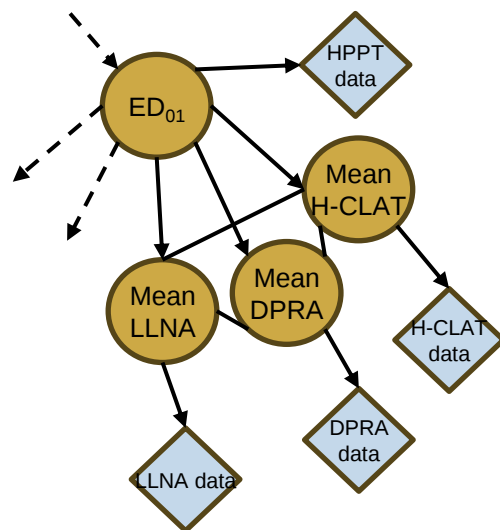
Artificial Neural Network Models

- Continuous EC3 prediction
- Can be translated into potency classes: NS, Weak/Moderate, Strong/Extreme
- Built using proprietary software (QwikNet), reproduced in R
- Two models: DPRA, hCLAT
- DPRA, hCLAT, KeratinoSens
- Run over multiple iterations and averaged



The SARA-ICE model

The SARA-ICE model is a high dimensional probability distribution built from a set of assumptions around conditional probability relationships.

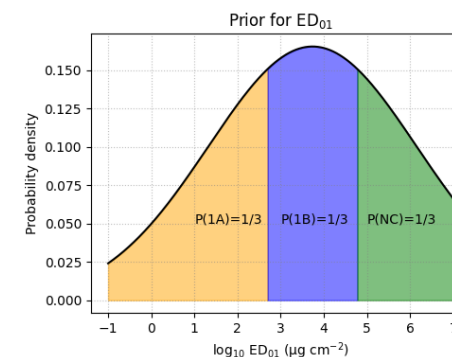


Parameters of the model are “learnt” using Bayesian updating.

$$P(A|B) = \frac{P(B|A)P(A)}{P(B)}$$

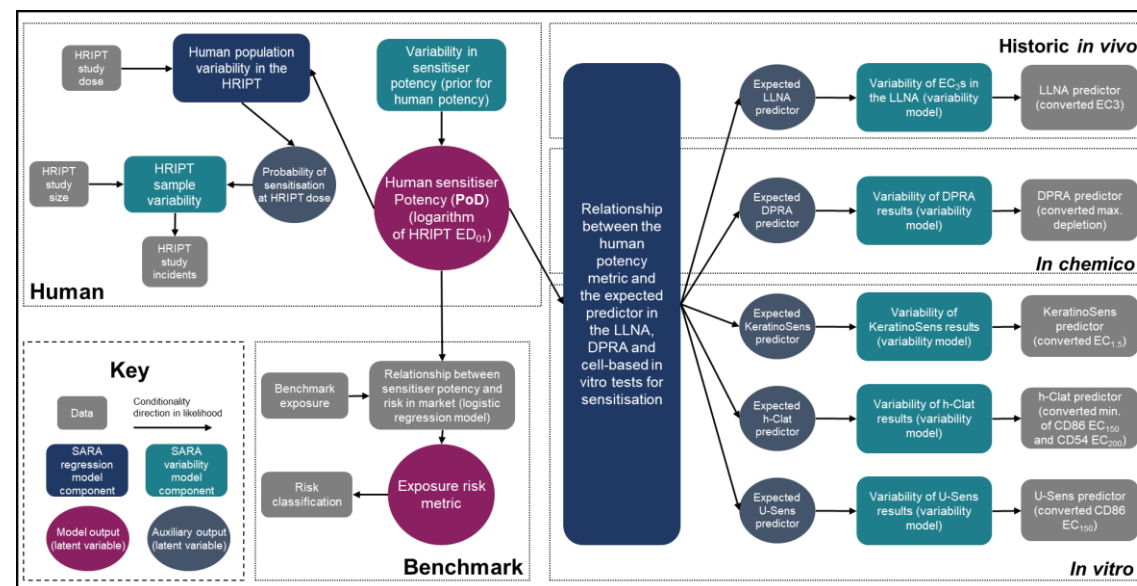
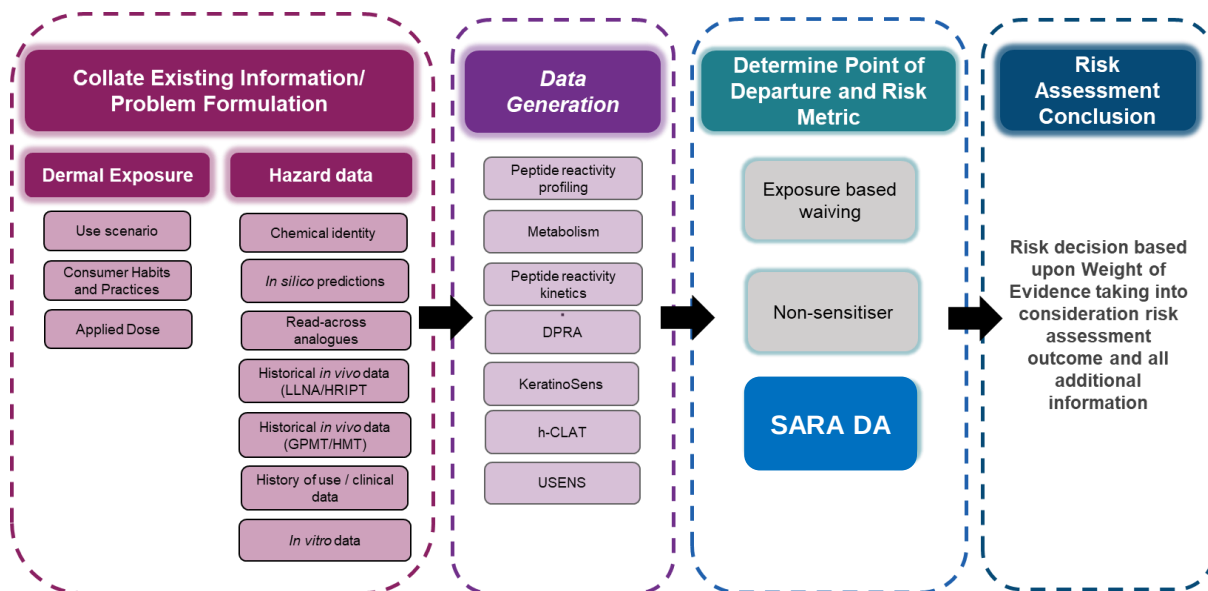
Bayes theorem is applied to calculate the conditional probability distribution of each parameter given the available data.

The primary variable of interest includes the ED₀₁, defined as the HPPT dermal dose at which there is a 1% sensitisation rate.



The ED₀₁ is converted to GHS classification probabilities for classification and labelling.

Skin Allergy Risk Assessment Defined Approach (SARA DA) was developed for application as part of a tiered, WoE NGRA framework



- **Unilever NGRA framework for Skin Allergy** was designed to use a WoE based upon all available information, accommodate range of consumer product exposure scenarios and provide a quantitative point of departure and risk metric → **SARA DA**

The use-case of the **SARA DA** is to estimate:

- ED₀₁, the dose at which there is a 1% chance of sensitization in an HPPT-eligible population
- Probability that a consumer exposure to some chemical is 'low risk', conditional on the available data and the model

Development history of the SARA-ICE model

2017-2019

A prototype Bayesian statistical model was developed at Unilever to estimate a no-effect-dose from HPPT data. This model was published in 2019.

2019-2021

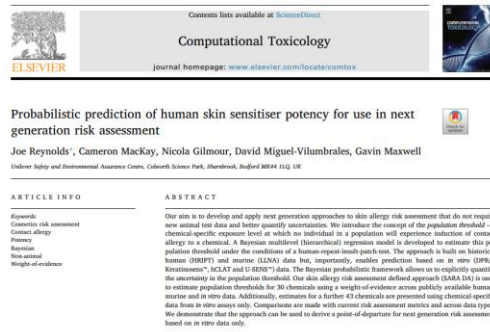
The model and underlying database are revised and expanded. Unilever performs an internal review to endorse for use in risk assessment.

2021-2022

The revised model is published within a set of three papers which the model and explore its use in case study risk assessment scenarios.

2021 - present

Unilever begins working with NICEATM to adapt the model for regulatory use. The SARA database is merged with the ICE database and the SARA-ICE model is developed.



Evaluation of the Skin Allergy Risk Assessment (SARA) model for skin sensitisation risk assessment

Contents	
1	Overview of the SARA model
2	Definition of the SARA point of departure
3	SARA database
4	Modelling the relationships between in vivo and in vitro skin sensitisation hazard data
4.1	HRPT data
4.1.1	Model structure and priors
4.1.2	Validity of and sensitivity to the assumptions
4.2	LINA data
4.2.1	Conversion of EC ₀₁ to a SARA predictor
4.2.2	Model structure and priors
4.2.3	Validity of and sensitivity to the assumptions
4.3	In chemico and in vitro data



NICEATM to collaborate with Unilever on development of predictive model for skin sensitization

NICEATM has entered into an agreement with consumer products company Unilever to collaboratively test and further develop their Skin Allergy Risk Assessment (SARA) predictive model. SARA is a computational model that uses a variety of input data to estimate a probability that a chemical will cause an allergic skin reaction in humans. NICEATM will test the SARA model using a variety of chemical data sets, including chemicals of interest to U.S. and international regulatory agencies. NICEATM and Unilever will also work together to expand the SARA model to include data generated by NICEATM. The intent is to make the SARA model openly available for public use along with other NICEATM predictive models. Availability of the SARA model will help further reduce animal use for the endpoint of skin sensitization, and will improve upon existing efforts by providing points of departure for quantitative human risk assessment.

Information about other NICEATM projects to evaluate alternatives to animal use for skin sensitization is available on the NTP website <https://doi.org/10.1016/j.comtox.2018.10.004>.

Reference: Reynolds et al. Probabilistic prediction of human skin sensitizer potency for use in next generation risk assessment. Comput Toxicol 9:38-49. <https://doi.org/10.1016/j.comtox.2018.10.004>

Modification of SARA to create SARA-ICE DA for Regulatory Application

Database

Aim to expand the core dataset underpinning the model using data in the ICE database (relaxing the constraint that chemicals be limited to cosmetic ingredients).

Risk benchmarking

De-emphasize the risk benchmarking component of the model – previous set of benchmarks limited to use of consumer goods. Use the model for human PoD estimation for quantitative risk assessment.

GHS classification

Add functionality to predict GHS potency classification (estimated as a class probability to communicate uncertainty in classification).



**Integrated
Chemical
Environment**

ICE: Integrated Chemical Environment (nih.gov)

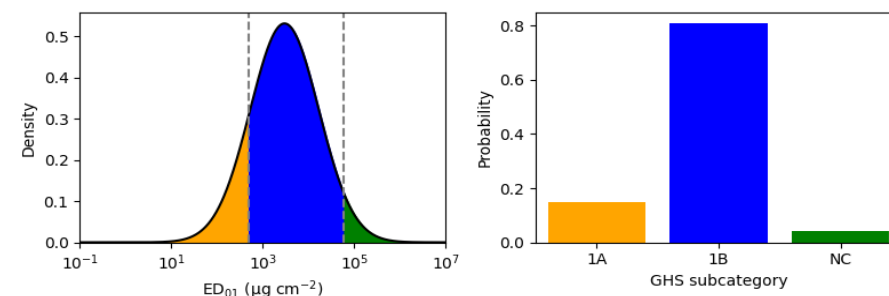
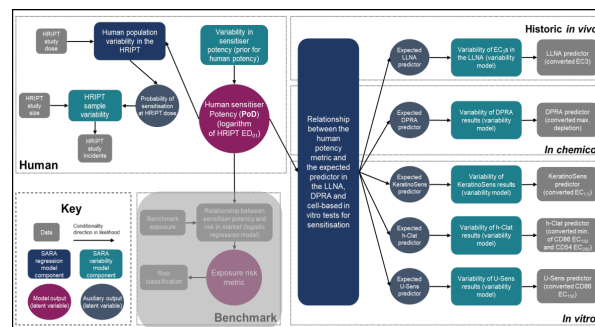
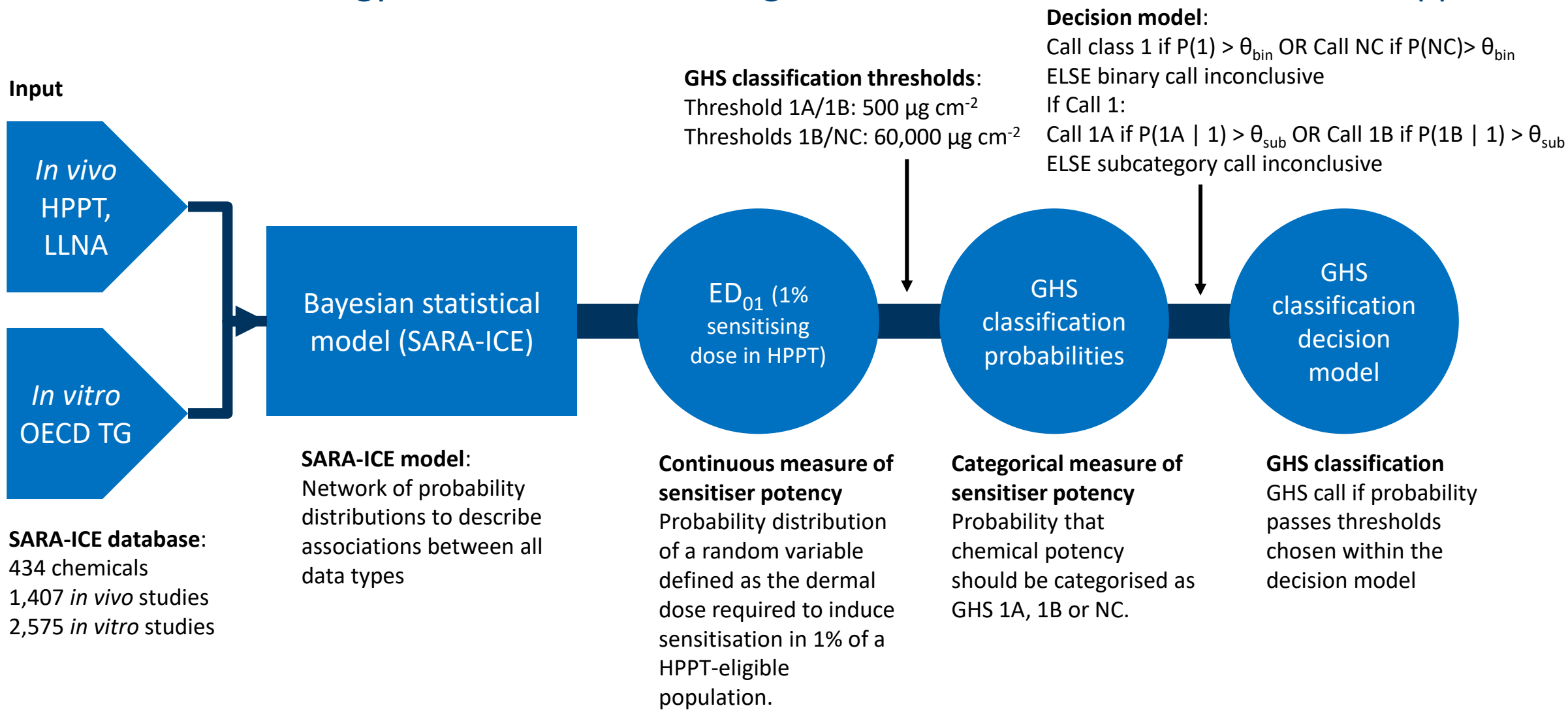


Figure (a) Example estimate of ED₀₁ distribution with overlay of GHS subcategories 1A, 1B and NC defined thresholds, (b) probability of each GHS subcategory from ED₀₁ distribution

SARA-ICE DA: Skin Allergy Risk Assessment - Integrated Chemical Environment Defined Approach



θ_{bin} = selected probability threshold for making a binary classification (1/NC)

θ_{sub} = selected threshold for making a sub-classification of 1A of 1B, contingent on class 1 being true

Model assumptions

HPPT

1. There is a dermal dose at which there is a 1% chance of inducing sensitisation in a randomly selected individual from a HPPT-eligible population.
2. The probability of inducing sensitisation in a HPPT increases with dose.
3. Each individual within a HPPT-eligible population has a personal threshold for sensitisation to any given chemical. This threshold may be greater than the maximum possible dose.
4. The distribution of the base-10 logarithm of personal thresholds has a Gaussian shape. The standard deviation is chemical-specific; different chemicals have different variabilities within the human population with respect to sensitivity to induction of sensitisation.
5. The number of individuals sensitised in a HPPT study follows a logit-normal-binomial compound distribution.

Model assumptions

Non-HPPT data

1. Data from the LLNA, DPRA, kDPRA, KeratinoSens, h-CLAT and U-Sens assays can be transformed such that it is reasonable to model variability in chemical-specific data in terms of a normal distribution (transformations mostly involve logarithms).
2. The same transformations put data on a scale in which it is reasonable to assume linear relationships between the average transformed datapoint on the base-10 logarithm of the ED_{01} .
3. The relationships between the average results can be described by a multivariate Gaussian distribution.
4. Variability in each test is chemical-specific. There is a latent variable for each test and each chemical which defines the variance of the chemical in the particular test.
5. Chemical-specific variance parameters can be estimated using partial pooling. The population of variances for each tested can be learnt and used to regularise chemical-specific estimates when limited data is available.

The SARA-ICE database

Study type	HPPT	LLNA	DPRA	kDPRA	KeratinoSens	h-CLAT	U-Sens
Inputs into SARA-ICE	Dermal dose, number tested, number sensitised	EC ₃ or maximum concentration tested if no response observed	% depletion of cysteine and lysine peptides	Log Kmax	EC _{1.5} or maximum concentration tested IC50 or maximum concentration tested	CD86 EC ₁₅₀ , CD50 EC ₂₀₀ or maximum concentration tested CV ₇₅ or maximum concentration tested	CD86 EC ₁₅₀ or maximum concentration tested CV ₇₅ or maximum concentration tested
Number of studies in database	871	536	650	361	972	428	164
Number of unique CASRN with this study type	276	195	251	185	258	211	90

434 distinct CASRN

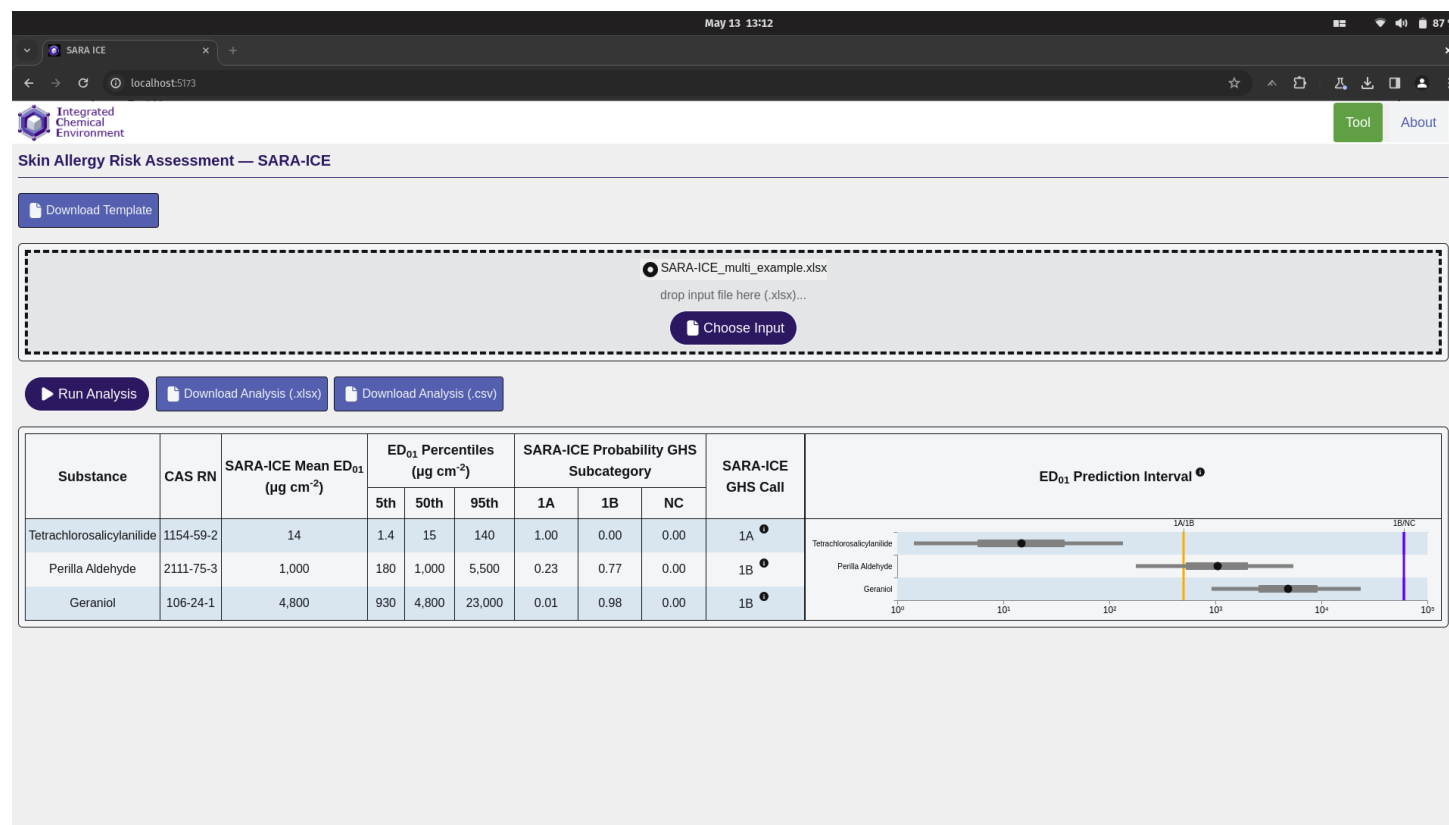
Computation

The SARA-ICE model is a mathematical model; it's assumptions and equations are expressible with pen and paper.

Learning model parameters requires numerical computation: the model is realised numerically using the programming language Stan. Python is used to process model inputs and outputs.

Computation requires many CPU cycles; however, a production version of the model has been developed to alleviate this limitation.

A standalone, downloadable version of the model has been created by NICEATM.

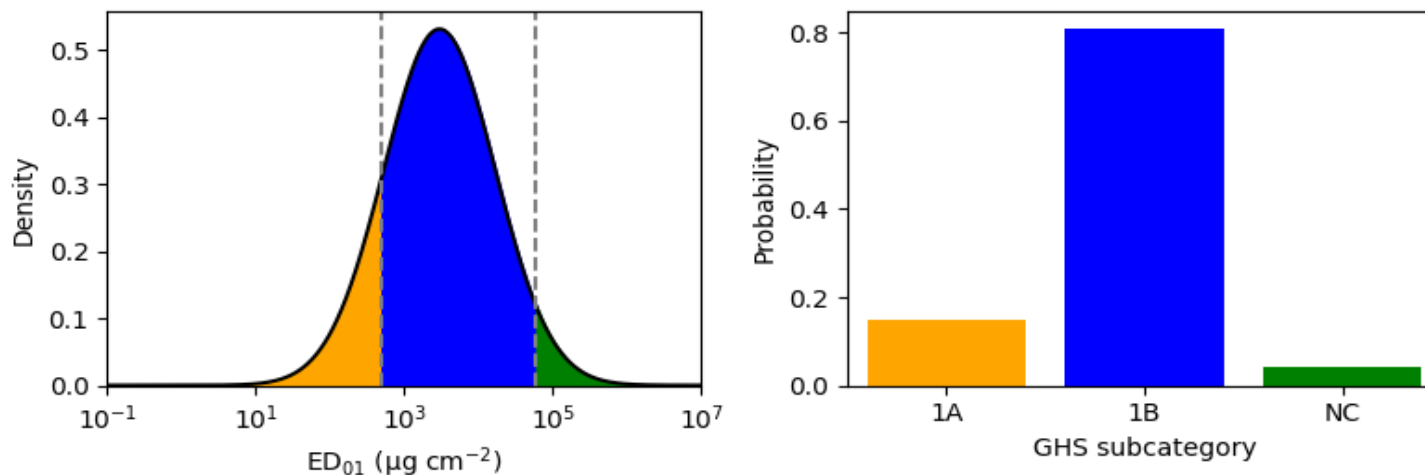


GHS classification

The distribution of the ED_{01} is used to defined GHS classification probabilities:

1. A threshold of $60,000 \mu\text{g cm}^{-2}$ (maximum possible HPPT dose under standard volume and patch size) is used to define the boundary between binary categories 1 and NC.
2. A threshold of $500 \mu\text{g cm}^{-2}$ is used to define the boundary between subcategories 1A and 1B.

The area under the curve between thresholds is the probability mass attributable to that interval. This defines the probability for the GHS classification.



SARA-ICE NAM vs OECD DASS benchmarks

Binary classifications

Human, $\Theta_{\text{bin}} = 0.77$	SARA-ICE 1	SARA-ICE NC	Inconclusive	Total
Reference 1	37	5	13	55
Reference NC	0	5	6	11
Total	37	10	19	66
Sensitivity: 88% Specificity: 100% Balanced accuracy: 94% Inconclusive rate on reference class 1: 24% Inconclusive rate on reference class NC: 55%				
LLNA, $\Theta_{\text{bin}} = 0.77$	SARA-ICE 1	SARA-ICE NC	Inconclusive	Total
Reference 1	89	9	37	135
Reference NC	2	19	12	33
Total	91	28	49	168
Sensitivity: 91% Specificity: 90% Balanced accuracy: 91% Inconclusive rate on reference class 1: 27% Inconclusive rate on reference class NC: 36%				

The SARA-ICE decision model has been evaluated against OECD benchmark classifications.

Estimates of the ED01 use NAM data only (1xDPRA, 1xKeratinoSens, 1xh-CLAT, 1xkDPRA)

Sensitivity, specificity and accuracy is computed for **conclusive** classifications only.

SARA-ICE NAM vs OECD DASS benchmarks

Subcategory classifications

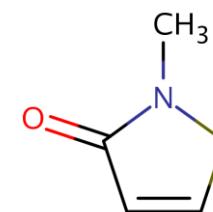
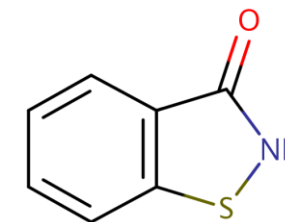
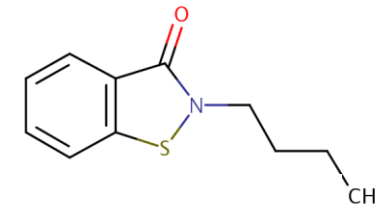
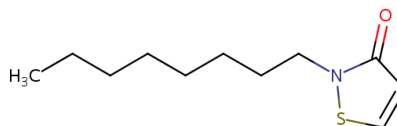
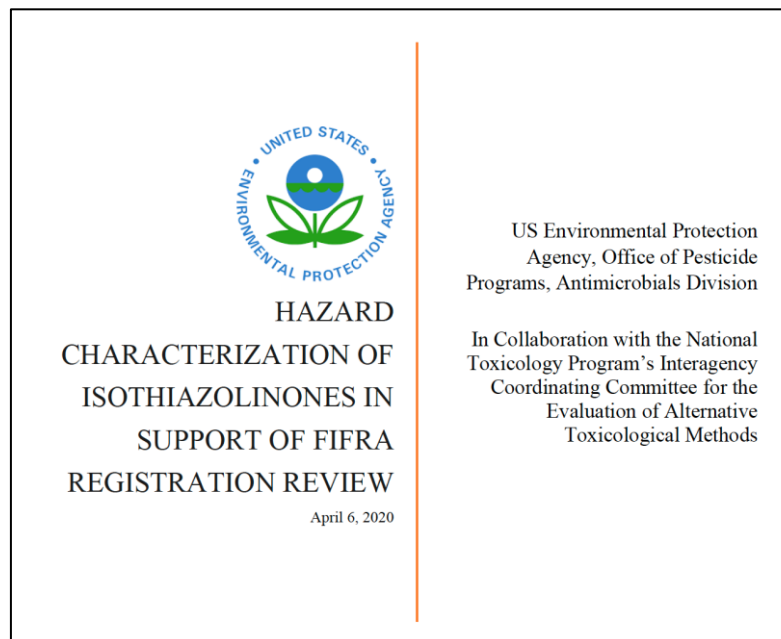
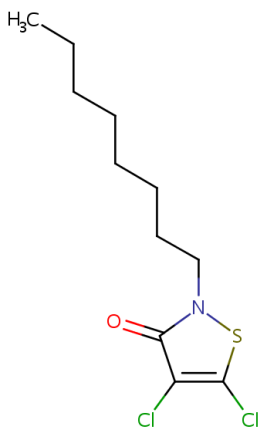
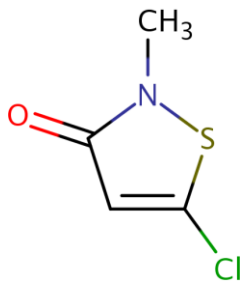
Human, $\Theta_{bin} = 0.77$, $\Theta_{sub} = 0.62$	SARA 1A	SARA 1B	SARA NC	Inconclusive	Total
Reference 1A	14	2	0	5	21
Reference 1B	3	7	5	16	31
Reference NC	0	0	5	6	11
Total	17	9	10	27	63
Sensitivity 1A: 88%, Specificity 1A: 85%, Balanced accuracy 1A: 86% Sensitivity 1B: 47%, Specificity 1B: 90%, Balanced accuracy 1B: 69% Sensitivity NC: 100%, Specificity NC: 84%, Balanced accuracy NC: 92% Average balanced accuracy: 82% Inconclusive rate on reference class 1A: 24% Inconclusive rate on reference class 1B: 52% Inconclusive rate on reference class NC: 55%					
LLNA, $\Theta_{bin} = 0.77$, $\Theta_{sub} = 0.62$	SARA 1A	SARA 1B	SARA NC	Inconclusive	Total
Reference 1A	27	3	0	8	38
Reference 1B	12	22	8	43	85
Reference NC	0	1	19	13	33
Total	39	26	27	64	156
Sensitivity 1A: 90%, Specificity 1A: 81%, Balanced accuracy 1A: 85% Sensitivity 1B: 52%, Specificity 1B: 92%, Balanced accuracy 1B: 72% Sensitivity NC: 95%, Specificity NC: 89%, Balanced accuracy NC: 92% Average balanced accuracy: 83% Inconclusive rate on reference class 1A: 21% Inconclusive rate on reference class 1B: 51% Inconclusive rate on reference class NC: 39%					

The SARA-ICE decision model has been evaluated against OECD benchmark classifications.

Estimates of the ED01 use NAM data only (1xDPRA, 1xKeratinoSens, 1xh-CLAT, 1xkDPRA)

Sensitivity, specificity and accuracy is computed for **conclusive** classifications only.

Case Study Application of DAs to Isothiazolinones



Isothiazolinone biocides are used as material preservatives to prevent the growth of microbial organisms and are used in industrial processes and consumer products

<https://www.federalregister.gov/documents/2020/05/14/2020-10376/pesticide-registration-review-draft-human-health-and-ecological-risk-assessments-for-several>

IT Compounds

Common Name	Chemical Name	CAS #
BBIT	1,2-benzisothiazolin-3-one, 2-butyl	4299-07-4
BIT	1,2-Benzisothiazolin-3-one	2634-33-5
CMIT/MIT	Mixture	55965-84-9
DCOIT	4,5-Dichloro-2-octyl-3(2h)-isothiazolone	64359-81-5
MIT	2-Methyl-4-isothiazolin-3-one	2682-20-4
OIT	2-n-Octyl-4-isothiazolin-3-one	26530-20-1

CMIT = 5-Chloro-2-methyl-4-isothiazolin-3-one

- Collaboration between EPA OPP, industry, and DTT/NICEATM
- DTT tested 6 isothiazolinones in three different in vitro assays
- Collect and analyze all available in vivo data
- Consider methods for using in vitro data for risk assessment and compare to results using in vivo methods

Quantitative EC3 Prediction for Isothiazolinones - ANN

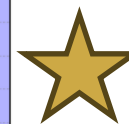
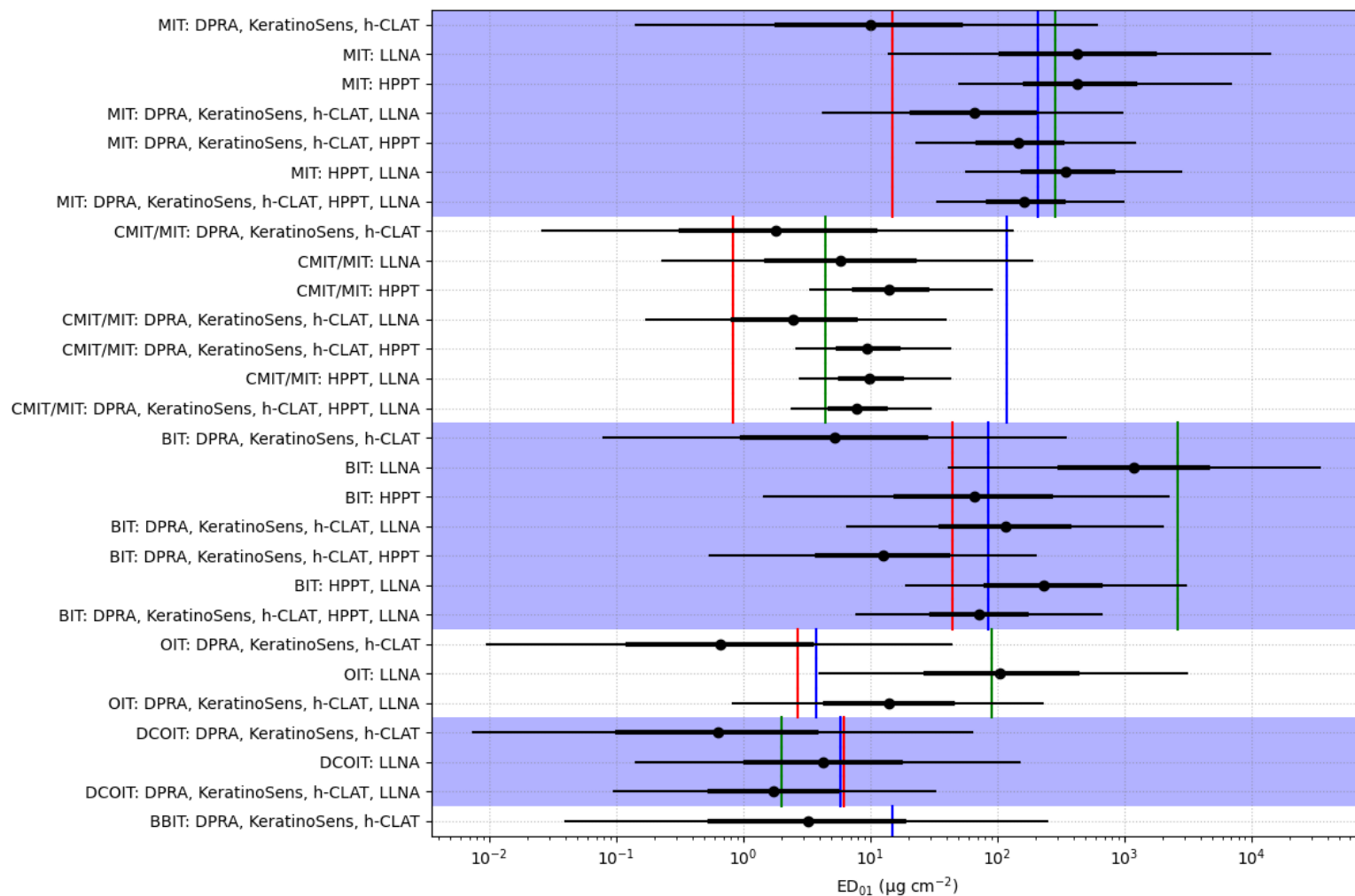
Chemical	Dow LLNA EC3 (%)	NICEATM LLNA EC3 (%) ^a	DA: ANN D_hC ^b EC3 (%) ^a	DA: ANN D_hC_KS ^c EC3 (%) ^a
DCOIT	0.004	0.008 (0-0.053)	0.0566 (0.0555 – 0.0578)	0.023 (0.02 – 0.026)
CMIT/MIT	0.002	0.018 (0.0011-0.034)	0.121 (0.119 – 0.123)	0.492 (0.4 – 0.605)
OIT	0.2-0.25	0.361 (0.029-0.69)	0.0569 (0.0559 – 0.058)	0.015 (0.013 – 0.017)
MIT	0.863	1.154 (0-3.476)	1.775 (1.732 – 1.818)	0.826 (0.759 – 0.9)
BIT	1.54	10.57 (0-23.36)	0.934 (0.909 – 0.959)	0.341 (0.317 – 0.367)
BBIT	NA	NA	0.148 (0.146 – 0.151)	0.061 (0.055 - 0.068)

^a Numbers in parentheses are the 95% confidence intervals

^b Model 1 from Hirota et al. 2015: DPRA + h-CLAT

^c Model 4 from Hirota et al. 2015: DPRA + h-CLAT + KeratinoSens

Example SARA-ICE Application – Isothiazolinones



**SARA-ICE –
ED₀₁ PoD estimates**

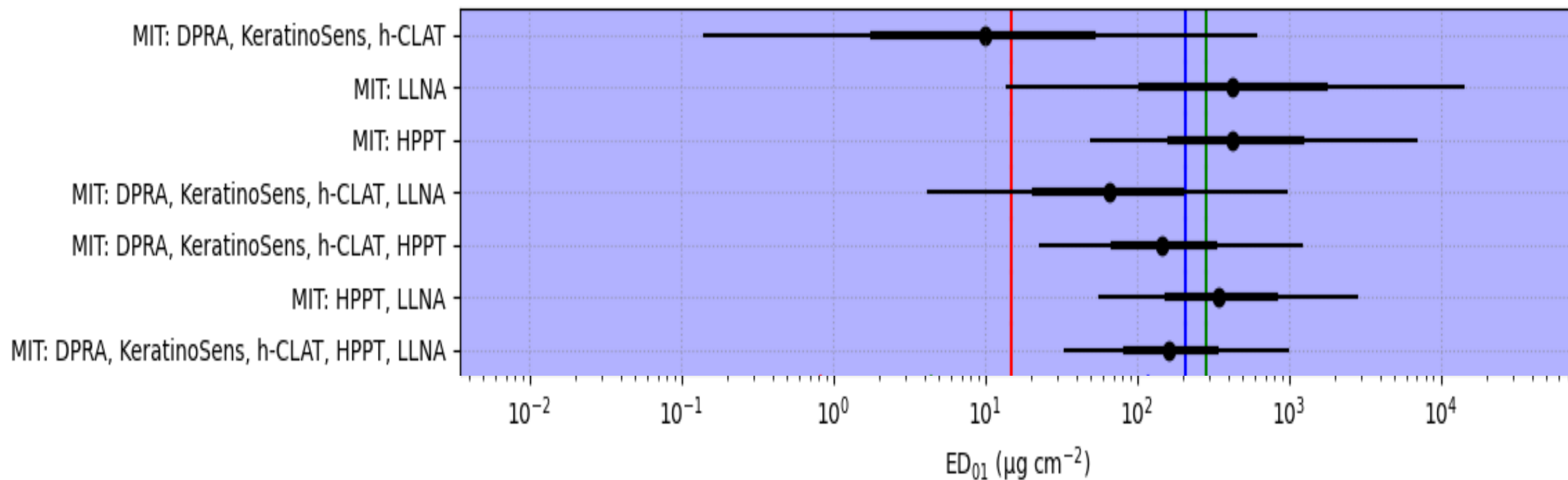
ED₀₁ estimates represented as centered 90% credible intervals (thin line), 50% credible intervals (thick line) and median (bullet). Red lines indicate the reference NESIL, blue lines are plotted at the EPA POD and green lines are plotted at the reference LLNA EC₃.

NESILs (ECHA; Burnett et al., 2021; Novick et al., 2013; Ladics et al., 2020); EPA POD (EPA DOCKET (<https://www.regulations.gov/document/EPA-HQ-OPP-2017-0720-0011>); LLNA EC₃ (Strickland et al., 2023)

SARA-ICE - MIT (2-Methyl-4-isothiazolin-3-one) – input data

Chemical	DPRA	kDPRA	KeratinoSens™	h-Clat	U-Sens™	Local Lymph Node Assay (LLNA)
MIT	Cysteine depletion: 97.9% Lysine depletion: 0% <i>Source:</i> Natsch et al., 2013	Log Kmax: $-0.25 \text{ M}^{-1} \text{ s}^{-1}$ <i>Source:</i> Natsch & Gerberick, 2022	EC _{1.5} : 11.78 µM IC ₅₀ : 139 µM <i>After unit conversion</i> EC _{1.5} : 1.4 µg ml ⁻¹ IC ₅₀ : 16 µg ml ⁻¹ <i>Source:</i> Natsch et al., 2013 & Urbisch et al., 2015 (Imax)	CD54 EC ₂₀₀ : 7.89 µg ml ⁻¹ CD86 EC ₁₅₀ : 9.23 µg ml ⁻¹ CV75: 24.7 µg ml ⁻¹ <i>Source:</i> Urbisch et al. 2015	CD86 EC ₁₅₀ : 9 µg ml ⁻¹ CV75: 44.3 µg ml ⁻¹ <i>Source:</i> Piroird et al., 2015	
	Cysteine depletion: 100% Lysine depletion: 0% <i>Source:</i> Kleinstreuer et al., 2018		EC _{1.5} : 9.54 µM IC ₅₀ : 108.25 µM <i>After unit conversion</i> EC _{1.5} : 1.1 µg ml ⁻¹ IC ₅₀ : 12 µg ml ⁻¹ <i>Source:</i> Kleinstreuer et al., 2018	CD54 EC ₂₀₀ : 11.6 µg ml ⁻¹ CD86 EC ₁₅₀ : 11.8 µg ml ⁻¹ CV75: 24.6 µg ml ⁻¹ <i>Source:</i> Kleinstreuer et al., 2018		EC ₃ : 2.2% EC ₃ : 0.4% EC ₃ : 0.863% EC ₃ : >4.5% <i>Source:</i> Kleinstreuer et al., 2018

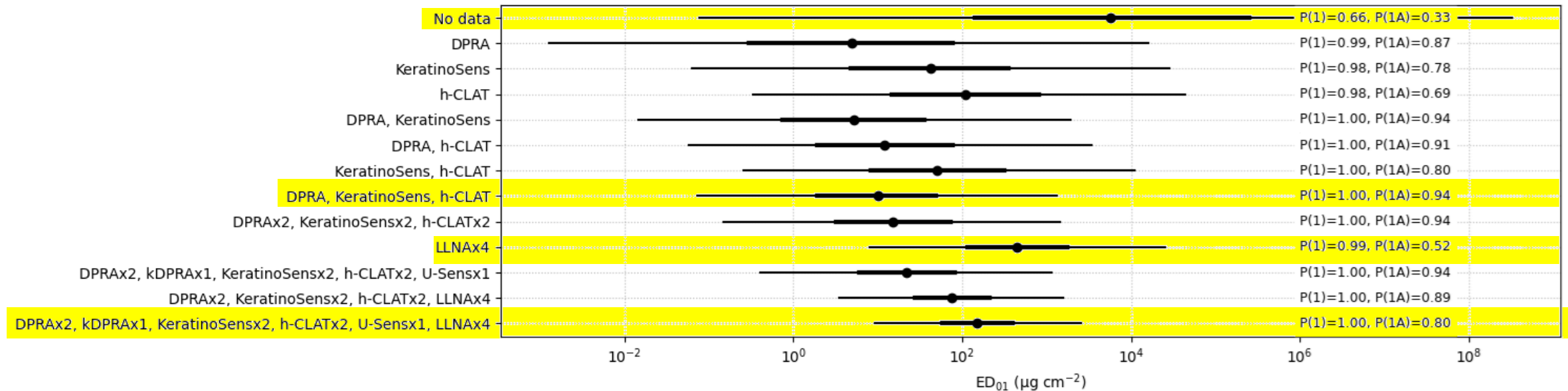
Example SARA-ICE Application – Isothiazolinones



ED_{01} estimates represented as centered 90% credible intervals (thin line), 50% credible intervals (thick line) and median (bullet). Red lines indicate the reference NESIL, blue lines are plotted at the EPA POD and green lines are plotted at the reference LLNA EC3.

NESILs (ECHA; Burnett et al., 2021; Novick et al., 2013; Ladics et al., 2020); EPA POD (EPA DOCKET (<https://www.regulations.gov/document/EPA-HQ-OPP-2017-0720-0011>); LLNA EC3 (Strickland et al., 2023)

SARA-ICE - MIT example – ED₀₁ PoD estimates



Summaries of ED₀₁ estimates for MIT conditional on different combinations of input data. Distributions are represented as centred 95% credible intervals (thin lines), centred 50% credible intervals (thick lines) and median (bullet). Predictions are ordered, from largest (top) to smallest (bottom), with respect to the uncertainty in the estimate.

ED₀₁ estimates for MIT for different SARA-ICE data inputs

Input Data	ED ₀₁ ($\mu\text{g cm}^{-2}$)	ED ₀₁ percentiles ($\mu\text{g cm}^{-2}$)					Prob(1A)	Prob(1B)	Prob(NC)
		2.5th	25th	50th	75th	97.5th			
No data	5,600	0.077	140	5700	>100,000	>100,000	0.33	0.33	0.34
DPRA	4.7	0.0013	0.29	4.9	78	16,000	0.87	0.12	0.011
KeratinoSens	42	0.063	4.8	42	360	28,000	0.78	0.2	0.015
h-CLAT	110	0.33	15	110	820	44,000	0.69	0.29	0.02
DPRA, KeratinoSens	5.1	0.014	0.73	5.2	36	1,900	0.94	0.061	0.0008
DPRA, h-CLAT	12	0.057	1.9	12	77	3,400	0.91	0.087	0.0021
KeratinoSens, h-CLAT	52	0.26	8.3	51	320	11,000	0.8	0.19	0.0049
DPRA, KeratinoSensTM h-CLAT	9.8	0.072	1.9	9.9	49	1,300	0.94	0.058	0.0004
DPRAx2, KeratinoSensx2, h-CLATx2	15	0.15	3.2	15	73	1,500	0.94	0.064	0.0003
LLNA x4	440	8.1	110	440	1,800	26,000	0.52	0.47	0.011
DPRAx2, kDPRAx1, KeratinoSensx2, h- CLATx2, U-Sensx1	22	0.41	6	22	81	1,200	0.94	0.058	0.0001
DPRAx2, KeratinoSensx2, h-CLATx2, LLNAx4	76	3.5	28	75	210	1,600	0.89	0.11	0
DPRAx2, kDPRA KeratinoSensTMx2, h-CLATx2, U-SensTM LLNAx4	150	9.4	59	150	400	2,600	0.8	0.2	0

SARA-ICE – MIT example – Probability that an exposure is less than the ED₀₁

Input combination	Exposure ($\mu\text{g cm}^{-2}$)											
	0.01	0.03	0.1	0.3	1	3	10	30	100	300	1000	3000
DPRA	0.93	0.89	0.82	0.75	0.65	0.55	0.43	0.32	0.23	0.16	0.096	0.058
KeratinoSens	0.99	0.99	0.97	0.94	0.88	0.79	0.67	0.54	0.39	0.27	0.16	0.092
h-CLAT	1	1	0.99	0.98	0.94	0.89	0.79	0.67	0.51	0.37	0.23	0.14
DPRA, KeratinoSens	0.98	0.96	0.91	0.83	0.71	0.57	0.41	0.27	0.15	0.084	0.038	0.018
DPRA, h-CLAT	0.99	0.99	0.96	0.92	0.82	0.7	0.53	0.37	0.22	0.12	0.057	0.027
KeratinoSens, h-CLAT	1	1	0.99	0.97	0.93	0.86	0.73	0.58	0.4	0.26	0.14	0.067
DPRA, KeratinoSens, h-CLAT	1	0.99	0.97	0.92	0.82	0.69	0.5	0.33	0.17	0.082	0.032	0.012
DPRAx2, KeratinoSensx2, h-CLATx2	1	1	0.98	0.95	0.88	0.76	0.58	0.39	0.21	0.096	0.035	0.012
LLNAx4	1	1	1	1	1	0.99	0.97	0.91	0.77	0.57	0.34	0.17
DPRAx2, kDPRAx1, KeratinoSensx2, h-CLATx2, U-Sensx1	1	1	1	0.98	0.94	0.84	0.66	0.43	0.22	0.091	0.029	0.0091
DPRAx2, KeratinoSensx2, h-CLATx2, LLNAx4	1	1	1	1	1	0.98	0.91	0.73	0.43	0.19	0.047	0.0095
DPRAx2, kDPRAx1, KeratinoSensx2, h-CLATx2, U-Sensx1, LLNAx4	1	1	1	1	1	1	0.97	0.88	0.61	0.32	0.095	0.019

Comparison of ED₀₁ estimates (based on different combinations of inputs) and probability that exposures are the less than the ED₀₁. Thresholds of 0.2 (**orange - $\geq 80\%$ likelihood that exposure is greater than ED₀₁**) and 0.8 (**blue - $\geq 80\%$ likelihood that exposure is less than ED₀₁**).

Conclusions

- SARA-ICE DA is being adapted for regulatory use through expanded data and functionality, and would be the first probabilistic defined approach included in an OECD TG.
- SARA-ICE DA shows good concordance with sensitizer binary and GHS sub-category classifications against OECD DASS benchmark data (82% – 95% BA)
- Case studies demonstrate benefits of SARA-ICE DA:
 - estimates human potency (ED_{01}) with uncertainty
 - estimates with in vitro and in vivo data inputs
 - estimates with incomplete and repeat datasets
- Evaluation of the SARA-ICE DA, including thresholds for conclusive predictions and performance impact, is ongoing within the OECD DASS expert group
- SARA-ICE is packaged for download for local implementation and **is available** for beta testing upon request via the NICEATM website (<https://ntp.niehs.nih.gov/whatwestudy/niceatm>)



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