



PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

September 17, 2020

Keith Faber  
Office of Auditor of State  
88 East Broad Street, 5th Floor  
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Via e-mail: [CentralRegion@ohioauditor.gov](mailto:CentralRegion@ohioauditor.gov);  
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Dear Auditor Faber,

Thank you in advance for your time. I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 6.5 million members and supporters. **Based on the information below, we request that your office audit the performance of Ohio State University (OSU) and the University of Cincinnati (UC) regarding the apparent waste of state resources allocated to support animal research activities.**

In FY 2019, OSU and UC received more than \$469 million<sup>1,2</sup> in state appropriations, part of which may have been used to support animal experimentation activities. During the COVID-19 pandemic, OSU and UC issued directives that likely led to the destruction of hundreds of animals they deemed extraneous, noncritical, or nonessential or described using similar terminology.

OSU informed its experimenters that "[o]nly critical research that needs to be done in the lab should be being conducted on campus at this time"<sup>3</sup> and instructed their University Laboratory Animal Resources staff to "euthanize animals that they identify meet [Early Removal Criteria]."<sup>4</sup> UC informed its experimenters that "only approved Critical [*sic*]

<sup>1</sup>The Ohio State University. (n.d.). *Financial statements as of and for the years ended June 30, 2019 and 2018 and report of independent auditors.*

[https://busfin.osu.edu/sites/default/files/0\\_2019\\_annual\\_financial\\_report.pdf](https://busfin.osu.edu/sites/default/files/0_2019_annual_financial_report.pdf)

<sup>2</sup>University of Cincinnati. (n.d.). *Financial statements as of and for the year ended June 30, 2019 and independent auditor's report.*

<https://www.uc.edu/content/dam/uc/af/controller/docs/AuditedFinancialReport2019.pdf>

<sup>3</sup>Ohio State University. (2020, March 18). *Letter from Morley O. Stone to deans and associate deans of research.* [https://research.osu.edu/files/OhioState\\_Morley\\_Stone-letter-deans-ADRs.pdf](https://research.osu.edu/files/OhioState_Morley_Stone-letter-deans-ADRs.pdf)

<sup>4</sup>Ohio State University. (2020, March 30). *Guidelines for animal colony maintenance during the university state of emergency.* <https://orpp.osu.edu/2020/03/31/guidelines-for-animal-colony-maintenance-during-the-university-state-of-emergency/>

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research activities" are allowed<sup>5</sup> and urged them to "prioritize ongoing essential research," to "[c]onsider delaying new projects and delaying acquisition of new animal subjects," and "[r]educe rodent breeding to only numbers required to maintain lines."<sup>6</sup>

That activities supporting unnecessary, nonessential, noncritical, or extraneous animal experimentation are taking place at OSU and UC at an apparent annual cost of millions of dollars, some of which may have been funded by the state, is the height of absurdity and wastefulness, and it is well within the mandate of your office to investigate this matter and rectify it.

**We respectfully urge that your office investigate and assess the following information as it relates to the apparent waste of state funds by OSU and UC on activities supporting experiments—and/or on the animals used in them—that the schools deemed extraneous during the COVID-19 pandemic:**

- 1) Any and all state-funded activities supporting animal experiments that OSU and UC suspended and/or ended in accordance with its response to COVID-19, such that the experiments may be categorized as unnecessary, extraneous, noncritical, or nonessential or described using similar terminology
- 2) The number and species of any and all animals used in state-funded research activities at OSU and UC covered by item number 1 above
- 3) The number and species of any and all animals used in state-funded experiments who are categorized by OSU and UC as unnecessary, extraneous, noncritical, or nonessential or described using similar terminology
- 4) The endpoint disposition (to include—but not be limited to—euthanasia, cull, sacrifice, killing, destruction, disposal, and/or reduction in cage census) of any and all animals used in state-funded experiments at OSU and UC covered by item number 1 above
- 5) The endpoint disposition (to include—but not be limited to—euthanasia, cull, sacrifice, killing, destruction, disposal, and/or reduction in cage census) of any and all animals at OSU and UC used in experiments receiving state funds who are themselves covered by item number 3 above
- 6) State funds used to support experiments at OSU and UC covered by item number 1 above, to include—but not be limited to—the purchase, breeding,

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<sup>5</sup>University of Cincinnati. (2020, March 23). *Coronavirus and your research*. <https://www.peta.org/wp-content/uploads/2020/05/University-of-Cincinnati-COVID-19-directive-regarding-animal-research.pdf>. The original source of this information has been updated (<https://research.uc.edu/coronavirus-and-your-research>).

<sup>6</sup>University of Cincinnati. (2020, March 17). *Recent updates*. <https://www.peta.org/wp-content/uploads/2020/05/University-of-Cincinnati-COVID-19-guidance-regarding-animal-research.pdf>. The original source of this information has been removed from the university's website ([https://researchhow2.uc.edu/docs/default-source/default-document-library/uc-research-continuity-planning-guidance-033020.pdf?sfvrsn=949f5520\\_14](https://researchhow2.uc.edu/docs/default-source/default-document-library/uc-research-continuity-planning-guidance-033020.pdf?sfvrsn=949f5520_14)).

- housing, feeding, maintenance, and/or veterinary care of any and all animals used in these experiments, and/or the payment of salaries and/or wages of personnel who attended to any and all animals used in these experiments
- 7) State funds used to purchase, breed, house, feed, maintain, or administer veterinary care to any and all animals—or pay the salaries and/or wages of personnel who attended to them—at OSU and UC covered by item number 3 above

Furthermore, the decision by OSU and UC to keep purchasing, breeding, housing, feeding, and maintaining animals to be used in state-funded research activities—where the experiments or animals themselves are deemed unnecessary, nonessential, noncritical, or extraneous or described using similar terminology—is at odds with the U.S. Public Health Service's *Guide for the Care and Use of Animals*, which includes the principle of "consideration of alternatives (in vitro systems, computer simulations, and/or mathematical models) to reduce or replace the use of animals,"<sup>7</sup> and with the *U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training* (1985), which state, "The animals selected for a procedure should be of an appropriate species and quality and the minimum number required to obtain valid results."<sup>8</sup>

When OSU and UC buy, breed, trap, and/or use animals who at any time—not just during the COVID-19 pandemic—can be deemed unnecessary, extraneous, nonessential, or noncritical or described using similar terminology, they are squandering limited public resources and flouting the bedrock "3Rs" principles of reducing, replacing, and refining the use of animals in experimentation that are enshrined in government regulations and policies.

Moreover, the Congressional Research Service has found that during the COVID-19 pandemic, "[s]uspending research may result in additional costs for activities such as animal care," and "[r]estarting research, when conditions permit, may also incur costs for staff time and supplies to . . . reestablish laboratory animal populations."<sup>9</sup> Ohio taxpayers should not be responsible for incurring additional costs to re-establish research activities involving animals, since OSU and UC deemed many of them not to be essential to the experiments and because resuming these activities and repopulating animals in laboratories at taxpayers' expense

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<sup>7</sup>National Research Council (U.S.) Committee for the Update of the Guide for the Care and Use of Laboratory Animals. (2011). *Guide for the care and use of laboratory animals*. 8<sup>th</sup> edition. <https://grants.nih.gov/grants/olaw/guide-for-the-care-and-use-of-laboratory-animals.pdf>.

<sup>8</sup>National Research Council (U.S.) Committee for the Update of the Guide for the Care and Use of Laboratory Animals. (2011). *Guide for the care and use of laboratory animals*. Appendix B: *U.S. government principles for the utilization and care of vertebrate animals used in testing, research, and training*. <https://www.ncbi.nlm.nih.gov/books/NBK54048/>.

<sup>9</sup>Congressional Research Service. (2020, April 10). *Effects of COVID-19 on the federal research and development enterprise*. <https://crsreports.congress.gov/product/pdf/R/R46309>.

would appear to violate federal regulations and policies that mandate the minimization of animal use in experiments.

**Based on this information, we urge your office to assess the use of public money, personnel, property, equipment, and space by OSU and UC for activities supporting experiments on animals that they deem unnecessary, extraneous, nonessential, or noncritical or describe using similar terminology. If wastefulness is corroborated, we request that you take all corrective actions to ensure that current state-funded research activities involving such animals are permanently terminated, that new state-funded research activities that include such animals are no longer approved, and that the breeding and acquisition of such animals for state-funded research activities are prohibited.**

You can contact me at [ShalinG@peta.org](mailto:ShalinG@peta.org). We look forward to your reply regarding this important matter. Thank you.

Sincerely yours,

A handwritten signature in black ink that reads "Shalin G. Gala". The signature is written in a cursive style with a large, looping initial "S".

Shalin G. Gala  
Vice President, International Laboratory Methods  
Laboratory Investigations Department