



PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

February 17, 2021

Richard J. Hodes, M.D.
Director
National Institute on Aging

Via e-mail: hodesr@31.nia.nih.gov

Dear Dr. Hodes:

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. On June 15, 2020, we sent a detailed letter to the U.S. Department of Health and Human Services Office of Inspector General urging Principal Deputy Inspector General Christi Grimm to investigate, assess, and take corrective action regarding the apparent egregious waste of National Institutes of Health (NIH) research grants—worth up to billions of taxpayer dollars each year—and the apparent failure of NIH-funded protocols to reduce and replace animal use in experiments as required by federal provisions.¹

Based on the new information presented below, we urge the National Institute on Aging (NIA) to cancel the taxpayer funding—amounting to a combined total of \$953,920 for FY 2019 and FY2020—granted to experimenters Mark Johnson and Sarah Dallas of the University of Missouri Kansas City (UMKC) for any and all renewals of their protocols, and insist that they reimburse the taxpayer funds used to acquire, breed, confine and maintain the animals used in experiments whom University of Missouri System (UM) categorized as unnecessary, extraneous, noncritical, non-essential, ramped down, disposable, or nonpriority or described using similar terminology and—according to documents obtained by PETA through Freedom of Information Act requests—ethanized in response to COVID-19.

Euthanizing Animals Extraneous to NIA-Funded Experiments Wastes Taxpayer Funds

Dallas conducts the NIA-funded protocol “Role of Extracellular Vesicles in Bone-Muscle Crosstalk with Aging”

¹People for the Ethical Treatment of Animals. (2020, June 15). *Request to the U.S. Department of Health and Human Services regarding the COVID-19 contingency plans at US universities*. <https://www.peta.org/wp-content/uploads/2020/06/20-06-15-Request-to-HHS-OIG-regarding-COVID-19-contingency-plans-at-US-universities.pdf>

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(5P01AG039355/6165),² and Johnson conducts the protocols “Animal Exercise and Analysis Core” (5P01AG039355/6162),³ and “Estrogen Receptor Mediated Regulation of Bone-Muscle Crosstalk” (5P01AG039355/6166).⁴ Per its COVID-19 response plan, UM notified its staff “about ramping down research activities where possible,” which led to the destruction of animals whom UM deemed unnecessary, extraneous, noncritical, or non-essential or described using similar terminology. Following UM’s directive, animals related to Dallas’s and Johnson’s respective protocols were killed and their deaths were logged in “euthanasia record” forms for the Laboratory Animal Research Core Hospital Hill facility, corresponding to March, April, May, and June 2020.⁵

The fact that the laboratories led by Dallas and Johnson had unnecessary, non-essential, noncritical, or extraneous animals in the first place should raise significant red flags, especially since their experiments are funded by taxpayers who should not have to foot the bill for such waste.

Johnson’s and Dallas’s NIA-Funded Protocols Failed to Reduce and Replace Animal Use

The presence of unnecessary, non-essential, noncritical, or extraneous animals in NIA-funded experiments led by Dallas and Johnson flies in the face of existing regulations designed to minimize the use of animals in experiments.

NIH-supported language requiring the minimization of the experimental use of animals is present in the Health Research Extension Act of 1985, the NIH Health Revitalization Act of 1993, the eighth edition of the *Guide for the Care and Use of Laboratory Animals*, and the U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training:

- The Health Research Extension Act of 1985 states, “The Director of NIH shall require each applicant for a grant, contract, or cooperative agreement involving research on animals ... to include in its application or contract proposal ... (1) assurances satisfactory to the Director of NIH that ... (B) scientists, animal technicians, and other personnel involved with animal care, treatment, and use by the applicant have available to them instruction or training in the ... use of

²NIH. (n.d.). *Role of extracellular vesicles in bone-muscle crosstalk with aging*. Research Portfolio Online Reporting Tools (RePORT): Project

Information. https://projectreporter.nih.gov/project_info_details.cfm?aid=9789128&icde=0

³NIH. (n.d.). *Animal exercise and analysis core*. Research Portfolio Online Reporting Tools (RePORT): Project

Information. https://projectreporter.nih.gov/project_info_details.cfm?aid=9934993&icde=0

⁴NIH. (n.d.). *Estrogen receptor mediated regulation of bone-muscle crosstalk*. Research Portfolio Online Reporting Tools (RePORT): Project

Information. https://projectreporter.nih.gov/project_info_details.cfm?aid=9934998&icde=0

⁵University of Missouri. (2020). *Euthanasia Record. Laboratory Animal Research Core Hospital Hill Facility*. <https://www.peta.org/wp-content/uploads/2021/01/2020-March-June-Euthanasia-Records-University-of-Missouri.pdf>

*research or testing methods that limit the use of animals or limit animal distress [emphasis added].*⁶

- The National Institutes of Health Revitalization Act of 1993 states, “The Director of NIH ... shall prepare a plan ... for the National Institutes of Health to conduct or support research into ... *methods of such research and experimentation that reduce the number of animals used in such research [emphasis added].*”⁷
- The eighth edition of the *Guide for the Care and Use of Laboratory Animals* states, “The *Guide* ... endorses the following principles: *consideration of alternatives (in vitro systems, computer simulations, and/or mathematical models) to reduce or replace the use of animals [emphasis added].*”⁸
- The U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training (1985) states, “The animals selected for a procedure should be of an appropriate species and quality and *the minimum number required to obtain valid results [emphasis added].*”⁹

When Dallas and Johnson, who are NIA-funded experimenters, buy, breed, trap, and/or use animals who at any time—not just during the COVID-19 pandemic—can be deemed unnecessary, non-essential, noncritical, extraneous or described using similar terminology, they squander limited research funds, which are provided by taxpayers, and flout the bedrock “3Rs” principle of reducing, replacing, and refining the use of animals in experimentation that is enshrined in government regulations and policies.

Under this standard, the number of unnecessary, non-essential, noncritical, or extraneous animals used in the experiments led by Dallas and Johnson should have been zero from the start since they weren’t relevant to their projects. Also, because taxpayer funds were used to acquire, breed, confine, and/or maintain these unnecessary, non-essential, noncritical, or extraneous animals who were then so easily euthanized and disposed of in response to COVID-19, UM should reimburse the NIA for this fiscal waste.

Furthermore, the Congressional Research Service (CRS) 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

⁶Health Research Extension Act of 1985, Publ. L. No. 99-158. (1985). <https://olaw.nih.gov/policies-laws/hrea-1985.htm>

⁷NIH Revitalization Act of 1993, Publ. L. No. 103-43. (1993). <https://grants.nih.gov/grants/olaw/pl103-43.pdf>

⁸National Research Council 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*. <https://grants.nih.gov/grants/olaw/guide-for-the-care-and-use-of-laboratory-animals.pdf>

⁹National Research Council Committee for the Update of the Guide for the Care and Use of Laboratory Animals. (2011). *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/>

populations.”¹⁰ Taxpayers and NIA should not be responsible for the additional costs associated with “reestablishing laboratory animal populations” since universities like UM deemed many of them to be unnecessary, non-essential, noncritical, or extraneous to the experiments and because repopulating animals in laboratories at taxpayers’ expense would appear to violate the aforementioned federal regulations and policies that mandate minimizing the use of animals in experiments.

Request for Research Accountability and Modernization

We urge you to cancel the funding granted to Dallas’s project 5P01AG039355/6165, and Johnson’s projects 5P01AG039355/6162 and 5P01AG039355/6166. In addition, we urge you to seek reimbursement from them for any and all NIA funds wasted to acquire, breed, confine and/or maintain the animals who the experimenters and/or UM deemed unnecessary, non-essential, noncritical, extraneous, or described using similar terminology and then euthanized. Moreover, we encourage NIA to redirect the funds it initially granted to Dallas and Johnson to instead now focus on projects using 3-D human tissue models of aging that have “the potential to address many of the limitations of traditional aging models” and “enable the study of aging in tissues in a higher-throughput, experimentally accessible manner.”¹¹

You can contact me at ShalinG@peta.org or at 757-962-8325. We look forward to your reply regarding this important matter. Thank you.

Sincerely yours,



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

¹¹Hu, J. L., Todhunter, M. E., LaBarge, M. A., & Gartner, Z. J. (2018). Opportunities for organoids as new models of aging. *Journal of Cell Biology*, 217(1), 39-50. <https://doi.org/10.1083/jcb.201709054>