



PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

February 17, 2021

C. Mauli Agrawal, Ph.D.  
Office of the Chancellor  
University of Missouri Kansas City

Via e-mail: [chancellor@umkc.edu](mailto:chancellor@umkc.edu)

Dear Chancellor Agarwal:

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 presented below, we urge the University of Missouri Kansas City (UMKC) to reimburse any and all federal and state funds used to acquire, breed, confine and/or maintain the animals used in experiments whom the University of Missouri System (UM) categorized as extraneous, noncritical, non-essential, ramped down, disposable, or nonpriority or described using similar terminology and—according to new documents obtained by PETA through Freedom of Information Act (FOIA) requests—euthanized in response to COVID-19.**

### **Euthanizing Unnecessary Animals in UMKC Experiments Wastes Taxpayer Funds**

According to new documents obtained by PETA through FOIA requests, animals assigned to the following protocols were killed in response to UM's COVID-19 response plan wherein staff was notified "about ramping down research activities where possible,"<sup>1</sup> leading to the destruction of animals deemed extraneous, noncritical, or non-essential or described using similar terminology:

- "Extracellular Vesicle Mediated Cell-Cell Communication in Bone," led by UMKC's Sarah Dallas, received \$172,212 in FY2018 from the National Institute of Arthritis and Musculoskeletal and Skin Diseases (NIAMS).<sup>2</sup>
- "Muscle-Bone Imaging Core," also led by Dallas, received \$205,827 in FY2020 from the National Institute on Aging (NIA).<sup>3</sup>

<sup>1</sup>University of Missouri. (n.d.). *Ramp-down letter*.

<https://research.missouri.edu/about/files/ramp-down-letter.pdf>

<sup>2</sup>NIH. (n.d.). *Extracellular vesicle mediated cell-cell communication in bone*. Research Portfolio Online Reporting Tools (RePORT): Project Information.

[https://projectreporter.nih.gov/project\\_info\\_details.cfm?aid=9433617&icde=53353289](https://projectreporter.nih.gov/project_info_details.cfm?aid=9433617&icde=53353289)

<sup>3</sup>NIH. (n.d.). *Muscle-bone imaging core*. Project number: P01AG039355-08; Sub-project 6161. Research Portfolio Online Reporting Tools (RePORT): Project Information.

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- “Animal Exercise and Analysis Core” and “Estrogen Receptor Mediated Regulation of Bone-Muscle Crosstalk During Aging,” led by UMKC’s Mark Johnson, received a total of \$611,969 in FY2020 from the NIA.<sup>4,5</sup>
- “Tissue Engineered Cell Transplantation for Glaucoma and Optic Neuropathies,” led by UMKC’s Karl Kador, received a total of \$775,000 in FY2019 and FY2020 from the National Eye Institute (NEI).<sup>6,7</sup>

The euthanasia of animals related to Dallas’s, Kador’s, and Johnson’s aforementioned protocols per UM’s response to COVID-19 was logged in “euthanasia record” forms for the Laboratory Animal Research Core Hospital Hill facility, corresponding to dates in March, April, May, and June 2020.<sup>8</sup>

The fact that laboratories led by UMKC’s employees had animals deemed unnecessary, extraneous, noncritical, or non-essential or described using similar terminology 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.

### **UMKC Protocols Apparently Failed to Reduce and Replace Animal Use**

The presence of unnecessary, non-essential, noncritical, or extraneous animals in UMKC laboratories 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 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

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[https://projectreporter.nih.gov/project\\_info\\_details.cfm?aid=9934992&icde=52160240](https://projectreporter.nih.gov/project_info_details.cfm?aid=9934992&icde=52160240).

<sup>4</sup>NIH. (n.d.). *Animal exercise and analysis core*. Project number: 5P01AG039355-08; Sub-project 6162. Research Portfolio Online Reporting Tools (RePORT): Project Information.

[https://projectreporter.nih.gov/project\\_info\\_details.cfm?aid=9934993&icde=52121253](https://projectreporter.nih.gov/project_info_details.cfm?aid=9934993&icde=52121253)

<sup>5</sup>NIH. (n.d.). *Estrogen receptor mediated regulation of bone-muscle crosstalk during aging*. Project number: 5P01AG039355-08; Sub-project 6166. Research Portfolio Online Reporting Tools (RePORT): Project Information.

[https://projectreporter.nih.gov/project\\_info\\_details.cfm?aid=9934998&icde=52121253](https://projectreporter.nih.gov/project_info_details.cfm?aid=9934998&icde=52121253)

<sup>6</sup>NIH. (n.d.). *Tissue engineered cell transplantation for glaucoma and optic neuropathies*. Project number: 5R01EY028946-02. Research Portfolio Online Reporting Tools (RePORT): Project Information.

[https://projectreporter.nih.gov/project\\_info\\_details.cfm?aid=9685226&icde=53390442](https://projectreporter.nih.gov/project_info_details.cfm?aid=9685226&icde=53390442).

<sup>7</sup>NIH. (n.d.). *Tissue engineered cell transplantation for glaucoma and optic neuropathies*. Project number: 5R01EY028946-03. Research Portfolio Online Reporting Tools (RePORT): Project Information.

[https://projectreporter.nih.gov/project\\_info\\_details.cfm?aid=9935080&icde=0](https://projectreporter.nih.gov/project_info_details.cfm?aid=9935080&icde=0)

<sup>8</sup>University 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>

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 *research or testing methods that limit the use of animals* or limit animal distress [*emphasis added*].”<sup>9</sup>

- 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*].”<sup>10</sup>
- 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*].”<sup>11</sup>
- 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*].”<sup>12</sup>

When UMKC 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, or extraneous or described using similar terminology, they squander limited research funds, much of 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 aforementioned experiments should have been zero from the start since they weren’t relevant to the protocols led by UMKC’s employees. 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, UMKC should reimburse the funding agencies 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 populations.”<sup>13</sup> Taxpayers should not be responsible for the additional costs associated with “reestablishing laboratory animal populations” since UMKC deemed many of them to be “unnecessary,” non-essential,

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<sup>9</sup>Health Research Extension Act of 1985, Publ. L. No. 99-158. (1985). <https://olaw.nih.gov/policies-laws/hrea-1985.htm>

<sup>10</sup>NIH Revitalization Act of 1993, Publ. L. No. 103-43. (1993). <https://grants.nih.gov/grants/olaw/pl103-43.pdf>

<sup>11</sup>National 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>

<sup>12</sup>National 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/>

<sup>13</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>

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 the minimization of animal use in experiments.

**Request for Research Accountability and Modernization**

We urge you to withdraw the referenced funds allocated to support these UMKC laboratories and reimburse the state and federal agencies with any and all funds used to acquire, breed, confine and/or maintain the animals who experimenters deemed unnecessary, non-essential, noncritical, or extraneous or described using similar terminology and then euthanized in March, April, May, and June 2020, in response to the UM's COVID-19 contingency directive. Moreover, instead of supporting wasteful experiments on animals that do not advance human health, we encourage UMKC to shift its efforts to projects focused on human-relevant, non-animal research methods, as described in PETA's Research Modernization Deal.<sup>14</sup>

You can contact me at [ShalinG@peta.org](mailto: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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<sup>14</sup>People for the Ethical Treatment of Animals. (2021). *The Research Modernization Deal 2021*. <https://www.peta.org/wp-content/uploads/2020/12/PETA-2021-Research-Modernization-Deal.pdf>