



March 30, 2022

John C. Geragosian and Clark J. Chapin  
Connecticut State Auditors

Via e-mail: [john.geragosian@cga.ct.gov](mailto:john.geragosian@cga.ct.gov); [clark.chapin@cga.ct.gov](mailto:clark.chapin@cga.ct.gov)

Dear Messrs. Geragosian and Chapin:

Thank you in advance for your time. I'm writing on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 9 million members and supporters worldwide—to share some troubling information we have obtained about the performance of the University of Connecticut (UConn) regarding the apparent waste of state resources allocated to animal research activities. In that regard, we request that your office audit the university and investigate the apparent fiscal waste of taxpayer money on crude animal experimentation.

Based on the information presented below, which we obtained through public records requests, we ask that you pursue the following:

1. Seek reimbursement of any and all state funds used to acquire, breed, confine, maintain, repopulate, and/or experiment on the animals used in laboratories and categorized by UConn as unnecessary, extraneous, noncritical, non-essential, ramped down, disposable, or nonpriority and/or described using similar terminology and euthanized in response to COVID-19.
2. Ensure that current state-funded research activities involving such animals are permanently terminated, that new state-funded research activities that include such animals are not approved, and that the breeding and acquisition of such animals for state-funded research activities are prohibited.

### **Euthanizing Animals Deemed Extraneous in UConn Labs Wastes Taxpayer Funds**

In fiscal year 2020, UConn received \$608.9 million in state support,<sup>1</sup> part of which may have been used to fund animal experimentation activities. UConn experimenter Harvey Swadlow conducted or conducts the National Eye Institute (NEI)–funded project “Thalamortical Processing of Visual Information During Alert

<sup>1</sup>University of Connecticut. “UConn Budget and Key Issues.” Accessed March 11, 2022. <https://budget.uconn.edu/wp-content/uploads/sites/1441/2019/06/FY20-Budget-Presentation-Fin-Affairs-6.10.19.pdf>.

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and Non-Alert Brain States”<sup>2</sup> (NIH project numbers 1R01EY028905-01, 5R01EY028905-02, 5R01EY028905-03, and 5R01EY028905-04), which has received \$1,195,425 from the NEI during FY2018 to FY2021.<sup>3</sup> Per its COVID-19 guidance, UConn notified its staff that “[l]abs and research programs should continue to have and refine plans to immediately halt or ramp down research activities, if required.”<sup>4</sup> A “Research Shut Down Notice” issued on March 23, 2020, directed research staff to “immediately reduce animal numbers and number of cages.”<sup>5</sup> In addition, the “COVID-19 Research Ramp Down” letter issued by the Office of the Vice President for Research, UConn notified its staff that “[r]esearchers will begin immediately to ramp down research activities, including laboratory, animal, and non-therapeutic human subjects research.”<sup>6</sup> As a result, two rabbits assigned to Swadlow’s aforementioned protocol were euthanized in March 2020.<sup>7</sup> This was verified in correspondence with UConn staff.<sup>8</sup> This protocol apparently wasted taxpayer funds by euthanizing these animals, and such activities occurred in a UConn laboratory that also likely makes use of Connecticut state money, personnel, property, equipment, and space.

The fact that laboratories at UConn had animals it deemed unnecessary, extraneous, noncritical, or nonessential or described using similar terminology in the first place should raise significant red flags. Their experiments are funded and/or supported by taxpayers, who should not have to foot the bill for such wasteful activities or for repopulating the animals who were so carelessly disposed of earlier.

### **UConn’s Protocols Failed to Reduce and Replace Animal Use**

The presence of unnecessary, nonessential, noncritical, or extraneous animals in UConn’s laboratories flies in the face of existing regulations designed to minimize the use of animals in experiments.

Government policy language requiring the minimization of the experimental use of animals is present in the Health Research Extension Act of 1985, the National Institutes of Health (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”:

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<sup>2</sup>Department of Health and Human Services National Institutes of Health. Notice of Award. Accessed March 11, 2022. <https://www.peta.org/wp-content/uploads/2022/02/R01EY028905.pdf>.

<sup>3</sup>NIH. RePORTER. Thalamocortical processing of visual information during alert and non-alert brain states. <https://reporter.nih.gov/search/Fwk69-p90k-benm3o0z4QA/projects>

<sup>4</sup>UConn. “COVID-19 Guidance for the UConn Research Community.” Accessed March 11, 2022. <https://ovpr.uconn.edu/covid-19-guidance-for-the-uconn-research-community-2-2/>.

<sup>5</sup>UConn. Research Shut Down Notice. March 22, 2020. Accessed March 11, 2022. [Research Shut Down Notice March 23, 2020 | Office of the Vice President for Research \(uconn.edu\)](https://ovpr.uconn.edu/research-shut-down-notice-march-23-2020/)

<sup>6</sup>UConn. “COVID-19 Research Ramp Down.” March 17, 2020. Accessed March 11, 2022. <https://ovpr.uconn.edu/2020/03/17/covid-19-research-ramp-down/>.

<sup>7</sup>UConn Animal Services. Individual Animal Health Record. Accessed March 11, 2022. [https://www.peta.org/wp-content/uploads/2022/02/FOIA-20-264\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2022/02/FOIA-20-264_Redacted.pdf).

<sup>8</sup>University of Connecticut. Public Records Request. Accessed March 11, 2022. <https://www.peta.org/wp-content/uploads/2022/02/confirmation-from-UConn.pdf>.

- 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 ... assurances satisfactory to the Director of NIH that ... 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”<sup>9</sup> [*emphasis added*].
- The NIH 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*”<sup>10</sup> [*emphasis added*].
- 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*”<sup>11</sup> [*emphasis added*].
- 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*”<sup>12</sup> [*emphasis added*].

When UConn’s experimenters buy, breed, trap, and/or use animals who at any time—not just during the COVID-19 pandemic—can be deemed unnecessary, nonessential, noncritical, or extraneous or described using similar terminology, they squander limited research funds, some of which are likely provided by Connecticut 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, nonessential, noncritical, or extraneous animals used in the aforementioned experiments should have been zero from the start. Also, since state taxpayer funds were likely used to acquire, breed, confine, and/or maintain these animals, who were then so readily euthanized and disposed of in response to COVID-19, UConn should reimburse the state of Connecticut for this fiscal waste.

Furthermore, the Congressional Research Service has found that during the COVID-19 pandemic, “Suspending research may result in additional costs for activities such as

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<sup>9</sup>Office of Laboratory Animal Welfare. National Institutes of Health. Health Research Extension Act of 1985, Publ. L. No. 99-158. Accessed March 11, 2022. <https://olaw.nih.gov/policies-laws/hrea-1985.htm>.

<sup>10</sup>National Institutes of Health. NIH Revitalization Act of 1993, Publ. L. No. 103-43. Accessed March 11, 2022. <https://grants.nih.gov/grants/olaw/pl103-43.pdf>.

<sup>11</sup>The National Academies Press. National Research Council Committee for the Update of the *Guide for the Care and Use of Laboratory Animals*. *Guide for the Care and Use of Laboratory Animals*. 8<sup>th</sup> ed. The National Academies Press; 2011. Accessed March 11, 2022. <https://grants.nih.gov/grants/olaw/guide-for-the-care-and-use-of-laboratory-animals.pdf>.

<sup>12</sup>National Institutes of Health. National Center for Biotechnology Information. National Research Council Committee for the Update of the *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.” 2011. Accessed March 11, 2022. <https://www.ncbi.nlm.nih.gov/books/NBK54048/>.

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> Connecticut taxpayers should not be responsible for any of the additional costs associated with “reestablishing laboratory animal populations,” since UConn deemed many of them to be unnecessary, nonessential, 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**

This information seems to corroborate the apparent waste of state funds by UConn on activities supporting experiments—and/or on the animals used in them—in response to COVID-19. Such seeming waste of precious resources by UConn does a disservice to the research enterprise, Connecticut taxpayers, and the animals killed.

We urge you to audit UConn’s actions in this matter and, if you corroborate the issues we have raised, hold the university accountable by requiring it to reimburse the state of Connecticut for apparent fiscal waste of state taxpayer funds with respect to the university’s animal experiments, also ensuring that current state-funded research activities involving such animals are permanently terminated, that new state-funded research activities that include such animals are not approved, and that the breeding and acquisition of such animals for state-funded research activities are prohibited.

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

Sincerely yours,



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<sup>13</sup>Congressional Research Service. “Effects of COVID-19 on the Federal Research and Development Enterprise.” April 10, 2020. Accessed March 11, 2022.  
<https://crsreports.congress.gov/product/pdf/R/R46309>.