August 10, 2022

Jeffrey R. Balser, M.D., Ph.D. President and CEO Vanderbilt University Medical Center

Via e-mail: jeff.balser@vanderbilt.edu

Dear Dr. Balser:

I hope this correspondence finds you well. I'm writing on behalf of People for the Ethical Treatment of Animals U.S.—PETA entities have more than 9 million members and supporters globally—to request that you take personal responsibility for addressing the chronic and egregious animal welfare violations that characterize the treatment of vulnerable animals in the laboratories of Vanderbilt University and the Vanderbilt University Medical Center (collectively referred to as VU).

According to records obtained by PETA through the Freedom of Information Act, VU reported <u>19 violations of federal animal welfare guidelines</u> in its laboratories to the National Institutes of Health's (NIH) Office of Laboratory Animal Welfare between January 2019 and August 2021. Employees' negligence resulted in suffering and death for numerous animals. Among other serious documented issues, the school's experimenters failed to provide nearly 300 mice with adequate pain relief before they were used in painful and invasive procedures.

For example, on at least three occasions, 110 mice were not administered adequate pain relief medication before they underwent craniotomies in which part of the skull was removed in order to expose the brain. Pain after a craniotomy is moderate to severe within the first several days, and inadequate pain management can lead to anxiety and depression.<sup>1,2</sup> In another incident, five mice endured the implantation of osmotic pumps without pain management during the invasive surgeries. One can only imagine the suffering these animals experienced when experimenters made long cuts into their abdomens, inserted the pumps, and attached sutures without pain management. Similarly, in another incident, mice were not given the complete pain medication regimen following invasive laparoscopic procedures, which entailed creating an incision in the abdomen and inserting a medical instrument. Experimenters also amputated the

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<sup>&</sup>lt;sup>1</sup>Vacas, Susana and Barbara Van de Wiele. "Designing a Pain Management Protocol for Craniotomy: A Narrative Review and Consideration of Promising Practices." *Surgical Neurology International*, vol. 8, Dec. 6, 2017, p. 291. *PubMed Central*, https://pubmed.ncbi.nlm.nih.gov/29285407/

<sup>&</sup>lt;sup>2</sup>Cho, Chulman, Vassilia Michailidis, Irene Lecker, et al. "Evaluating Analgesic Efficacy and Administration Route Following Craniotomy in Mice Using the Grimace Scale." *Scientific Reports*, vol. 9, no. 1, 2019, p. 359. *PubMed Central*, <u>https://doi.org/10.1038/s41598-018-36897-w</u>.

tails of 30 mice without any anesthetics or other pain relief required by the approved protocol.

Several principal investigators (PIs) repeatedly violated protocols, reflecting a long history of chronic violations of basic animal welfare guidelines. For example, one PI, Richard B. Simerly, failed to administer pain relief to 50 mice following invasive brain surgery, didn't use an aseptic technique, failed to use the appropriate sutures, and didn't remove the sutures at the appropriate time.

On eight occasions, mice and their pups died from starvation or dehydration because laboratory personnel didn't give them access to food or water. Four mice confined to a cage were found to be dying or already dead from suffocation because lab personnel didn't secure the positive pressure cage into the biocontainment unit rack, effectively cutting off all oxygen.

Experimenters deviated from approved protocols and conducted experiments on animals not included in protocols that the Institutional Animal Care and Use Committee (IACUC) had approved—suggesting systemic problems in the school's experimentation program. For example, a student performed surgery on mice that was not approved in the protocol.

In another incident, technicians threw out a box full of live mice after unpacking four other boxes containing mice that had been delivered to the institution. VU's culture of disregard for basic animal welfare must not be allowed to stand. Such problems will continue unless the school implements a strong deterrent. The university must inform PIs that if they violate federal animal welfare regulations or guidelines, the IACUC will withdraw approval of their protocol, revoke the investigator's animal experimentation privileges, and permanently prohibit violators from accessing all animal laboratories.

As you know, VU has a long history of chronic and systemic violations of federal animal welfare regulations and guidelines in its laboratories. The U.S. Department of Agriculture (USDA) issued a critical violation and cited VU after four guinea pigs died painfully and in distress while being used in experiments in which a tube was forced down their windpipes. The lead experimenter didn't even have a veterinarian present as required, and it was later determined that the guinea pigs had not been fully anesthetized and likely endured extreme suffering. The experimenter also attempted to hide these issues.

In 2021, the USDA cited VU after six rabbits were found to be suffering and in pain because an experimenter injected a test drug into their eyes. The rabbits' eyes were red and swollen, and some animals couldn't open them. The USDA fined VU more than \$15,000 after countless previous violations. Among other violations, a squirrel monkey died from dehydration because experimenters didn't give him water and a galago monkey was scalded to death when she was run through a high-temperature mechanical cage washer while she was trapped inside.

In fiscal year 2021, VU received more than \$462,118,540 in taxpayer funds from NIH. Funding agencies—and the public—expect that institutions will comply with minimal animal welfare regulations and guidelines with the provision of such funding. The university's failures represent an abject violation of the public's trust and tarnish the reputation and brand that VU has built. We ask that you address this serious matter immediately and adopt PETA scientists' <u>Research</u>

<u>Modernization Deal</u>—a strategy for replacing animal experiments with modern, human-relevant, animal-free research methods.

I'm available to discuss these issues with you and can be reached at 541-848-7465 or <u>AndreaK@peta.org</u>. Thank you for your time and consideration of this important matter.

Sincerely,

Andréa Kuchy, Ph.D. Research Associate, Laboratory Investigations

cc: Daniel Diermeier, Ph.D., Chancellor (<u>Daniel.diermeier@vanderbilt.edu</u>)