



November 10, 2022

Brent C. Morse, D.V.M.
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health

Via e-mail: MorseB@mail.nih.gov

Dear Dr. Morse:

We believe that the “critical” violation of the federal Animal Welfare Act documented in the attached U.S. Department of Agriculture (USDA) inspection report concerning Johns Hopkins University (JHU) constitutes a violation of the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy). This year, JHU received \$817,967,024 from the National Institutes of Health (NIH), and according to NIH, an estimated 47% of those funds supported projects that involved experiments on animals.

In 1985, members of Congress from both sides of the aisle worked together to strengthen protections for animals in laboratories in order to address deep-seated ethical concerns held by the American public regarding the use of animals in experiments. Polling by the Pew Research Center found that more than 50% of U.S. adults oppose the use of animals in experiments, and other surveys suggest that the support of the shrinking group that continues to accept animal experimentation is contingent on the existence and enforcement of stringent regulations aimed at protecting animals.

As you know, institutions that receive funding from Public Health Service agencies—including NIH—are required to comply with PHS Policy. Failure to comply violates not only federal animal welfare guidelines and policies but also public expectations that facilities receiving tax dollars to use animals—who are capable of experiencing pain, distress, love, and companionship and value their lives just as we value ours—at the very least comply with minimal standards intended to ensure some modicum of animal welfare.

We ask that your office investigate the incidents outlined in the attached report. Thank you for your time and consideration.

Sincerely yours,

Shriya Swaminathan
Science Policy Advisor, International Laboratory Methods Division
Laboratory Investigations Department

Enclosure

USDA inspection report of JHU, dated September 27, 2022

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

Washington
1536 16th St. N.W.
Washington, DC 20036
202-483-PETA

Los Angeles
2154 W. Sunset Blvd.
Los Angeles, CA 90026
323-644-PETA

Norfolk
501 Front St.
Norfolk, VA 23510
757-622-PETA

Info@peta.org
PETA.org

Entities:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)



Inspection Report

Johns Hopkins University
720 Rutland Avenue
Ross 459
Baltimore, MD 21205

Customer ID: **81**
Certificate: **51-R-0006**
Site: 003
JOHNS HOPKINS UNIVERSITY,
THE

Type: ROUTINE INSPECTION
Date: 27-SEP-2022

2.33(b)(3) Critical

Attending veterinarian and adequate veterinary care.

The Laboratory study notes for Rabbit Study A show insufficient documentation of daily observations following tumor implantation on 8/18/22. According to the protocol animals will be observed for signs of distress such as lethargy, lack or response to stimuli, food and water intake, feces and urine output, respiratory distress, guarding incision, hiding in the corner, aggression, and physical examination at the incision site. The records provided at the time of inspection showed little documentation of fecal output, feed consumption and the other parameters for signs of distress. Weights were only recorded on 8/18/22, 8/23/22, and 8/31/22. On 8/31/2022, there were observation notes that indicated the rabbit did not accept treats, had decreased fecal output, and decreased energy. The rabbit's symptoms were not reported to the veterinary staff as indicated in the protocol.

The Animal Caretaker contacted the RAR Veterinary Staff on 9/1/22 after noting the rabbit was lethargic and the fecal/urine output was decreased. RAR Veterinary Staff examined the rabbit. The rabbit was euthanized and the body condition score at necropsy was 1 of 5.

Monitoring parameters stated in the protocol were not appropriately followed and documented by the research staff. The research staff did not notify the RAR veterinary staff on 8/31/22 that the rabbit's weight had decreased and the health of the animal had declined. As a result, the examination of the rabbit by a facility veterinarian was delayed.

Prepared By: JESSICA GOWINS
USDA, APHIS, Animal Care
Title: VETERINARY MEDICAL OFFICER

Date:
12-OCT-2022

Received by Title: Attending Veterinarian

Date:
12-OCT-2022



Inspection Report

Animals must be observed daily to assess their physical and psychological well-being. Any abnormalities noted must be reported to the veterinarian. Should the daily observations be done by someone other than the attending veterinarian, a mechanism of direct and frequent communication must be employed to ensure that problems of animal health are conveyed to the attending veterinarian in a timely and accurate manner.

At the time of inspection the IACUC was developing a corrective action plan that had not been implemented.

To Be Corrected by: November 30, 2022

This inspection and exit interview were conducted with Attending Veterinarian and facility representatives.

This inspection was conducted 09/27/2022 to 09/30/2022.

Additional Inspectors:

GLORIA MCFADDEN, VETERINARY MEDICAL OFFICER

Prepared By: JESSICA GOWINS
USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL
OFFICER

Date:
12-OCT-2022

Received by Title: Attending Veterinarian

Date:
12-OCT-2022



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
81	51-R-0006	003	JOHNS HOPKINS UNIVERSITY, THE	27-SEP-2022

Count	Scientific Name	Common Name
000025	<i>Mesocricetus auratus</i>	SYRIAN / GOLDEN HAMSTER (COMMON PET/RESEARCH TYPE)
000004	<i>Canis lupus familiaris</i>	DOG ADULT
000043	<i>Cavia porcellus</i>	DOMESTIC GUINEA PIG
000203	<i>Callithrix jacchus</i>	COMMON MARMOSET
000071	<i>Macaca mulatta</i>	RHESUS MACAQUE
000013	<i>Macaca nemestrina</i>	PIG-TAILED MACAQUE
000049	<i>Sus scrofa domestica</i>	DOMESTIC PIG / POTBELLY PIG / MICRO PIG
000065	<i>Oryctolagus cuniculus</i>	DOMESTIC RABBIT / EUROPEAN RABBIT
000048	<i>Rousettus aegyptiacus</i>	EGYPTIAN FRUIT BAT
000093	<i>Eptesicus fuscus</i>	BIG BROWN BAT
000025	<i>Chinchilla lanigera</i>	CHINCHILLA (DOMESTICATED)
000020	<i>Mustela putorius furo</i>	DOMESTIC FERRET
000002	<i>Felis silvestris catus</i>	CAT ADULT
000025	<i>Cricetulus griseus</i>	CHINESE HAMSTER
000081	<i>Carollia perspicillata</i>	SEBA'S SHORT-TAILED BAT
000027	<i>Papio anubis</i>	OLIVE BABOON
000007	<i>Ovis aries aries</i>	SHEEP INCLUDING ALL DOMESTIC BREEDS
000801	Total	