DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:
Office of Laboratory Animal Welfare
6700B Rockledge Drive, Suite 2500, MSC 6910
Bethesda, Maryland 20892-6910
Home Page: http://grants.nih.gov/grants/olaw/olaw.htm

FOR EXPRESS MAIL:
Office of Laboratory Animal Welfare
6700B Rockledge Drive, Suite 2500
Bethesda, Maryland 20817
Telephone: (301) 496-7163
Facsimile: (301) 480-3387

March 9, 2021

Re: Animal Welfare Assurance
A3368-01 [OLAW Case 10K]

Dr. Nadine Connor
Associate Vice Chancellor
for Research Policy and Compliance
University of Wisconsin-Madison
(b) (4) Bascom Hall – 500 Lincoln Drive
Madison, WI 53706

Dear Dr. Connor,

The Office of Laboratory Animal Welfare (OLAW) acknowledges your letter, received in our office on February 18, 2021, sent in response to our January 7, 2021 request for additional information regarding allegations by People for the Ethical Treatment of Animals (PETA) of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Wisconsin National Primate Research Center (WNPRC). We requested additional information regarding the following two issues:

1) *Please provide a short description of the social housing status of the remaining 17% of rhesus macaques and the other NHP species at the WNPRC.*

Response:
Currently, every member of our common marmoset colony is socially housed. However, a small subset of our rhesus and cynomolgus macaques (that are not exempted from social housing for IACUC approved research reasons) remain singly housed because we have not yet found them a compatible partner or group. Our Behavioral Services Unit personnel, in collaboration with members of our Colony Management, work rigorously to find compatible partners or social groups for these animals.

- Most of the singly housed animals are adult male members of our macaque breeding colony. The animals are paired on an intermittent basis with females to create offspring for future research projects and to maintain the colony, thus they are not continuously singly housed. When not housed with a female, the males receive enhanced enrichment (e.g., extra manipulanda, increased foraging opportunities, larger enclosures, etc.) as outlined in the EEP and live within enclosures where they are always able to see, hear, and smell other conspecifics.

- Some female macaques are singly housed for short periods of time when their female partners are paired with male members of the colony for breeding purposes. These pairs are reunited when the breeding period ends.

Greater than 85% of the singly housed macaques we place in social situations remain with their pair or group for extended periods. Animals for which we cannot find compatible partners continue to receive all other components of the EEP at an enhanced frequency.

2) *Please provide a timeline for the movement of this animal* [Macaque rh2819] *to a larger enclosure.*

Response:
On November 12, 2020, rhesus macaque rh2819 was given access to the enclosure directly adjacent to his own home enclosure. Thus, the animal's new living space is now 100% larger than that stipulated by the Guide for the Care and Use of Laboratory Animals and the AWAR. Recently, personnel from our Behavioral Services Unit paired rh2819 with an age-matched adult female macaque that he can live continuously. The animals appear to be compatible, and the plan is to move the pair to a larger enclosure in the near future and to add additional adult females to create a small breeding group.

OLAW appreciates your cooperation and assistance in this matter. The investigation of these issues by the University of Wisconsin and the WNPRC was consistent with the PHS Policy and your commitments as stated in your Animal Welfare Assurance with this office. We appreciate your open communication with OLAW and find no need for further action by this office regarding this matter. Thank you.

Sincerely,

Brent C. Morse -S

Digitally signed by Brent C. Morse -S
Date: 2021.03.09 14:35:21 -05'00'

Brent C. Morse, DVM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC contact

A3368-10K

Office of the Vice Chancellor for
Research and Graduate Education
UNIVERSITY OF WISCONSIN-MADISON

Re: Response to January 7, 2021 request for information

Dear Dr. Morse:

With this letter, the UW-Madison provides the follow-up information you requested in your January 7, 2021 letter. This information supplements that found in our November 20, 2020 letter in response to PETA allegations of September 20, 2020.

1. **Request for information:** On page 7 of your response, under "*I., C. Failure to use appropriate methods to prevent injuries in monkeys.*" *You state that "83% of rhesus macaques that are not exempted from being paired or grouped due to scientific reasons are socially housed.*" Please provide a short description of the social housing status of the remaining 17% of rhesus macaques and the other NHP species at the WNPRC.

Response: Per Animal Welfare Act Regulation (AWAR) 9 CFR, Part 3, Subpart D, Section 3.81, the Wisconsin National Primate Research Center (WNPRC) has developed, documents, and follows an appropriate plan for environment enhancement to promote psychological well-being of nonhuman primates. Furthermore, Per Section 3.81 (a) of the AWAR (*Social grouping*) and the Guide for the Care and Use of Laboratory Animals, the main component of our environment enhancement plan (EEP) is focused on addressing the social needs of all nonhuman primates living at the WNPRC and aims to place as many of our nonhuman primates as possible in compatible pairs or larger groups.

Currently, every member of our common marmoset colony is socially housed. However, a small subset of our rhesus and cynomolgus macaques (that are not exempted from social housing for IACUC approved research reasons) remain singly housed because we have not yet found them a compatible partner or group. Our Behavioral Services Unit personnel, in collaboration with members of our Colony Management, work rigorously to find compatible partners or social groups for these animals.

- Most of the singly housed animals are adult male members of our macaque breeding colony. The animals are paired on an intermittent basis with females to create offspring for future research projects and to maintain the colony, thus they are not continuously singly housed.
    - When not housed with a female, the males receive enhanced enrichment (e.g., extra manipulanda, increased foraging opportunities, larger enclosures, etc.) as outlined in the EEP and live within enclosures where they are always able to see, hear, and smell other conspecifics.
- Some female macaques are singly housed for short periods of time when their female partners are paired with male members of the colony for breeding purposes. These pairs are reunited when the breeding period ends.

Greater than 85% of the singly housed macaques we place in social situations remain with their pair or group for extended periods. Animals for which we cannot find compatible partners continue to receive all other components of the EEP at an enhanced frequency.

2. **Request for information:** On page 15, under "*IV., A., Stereotypic movement and other behaviors indicative of psychological distress vi." You state that "Macaque rh2819… will soon be moved to a larger enclosure…*" Please provide a timeline for the movement of this animal to a larger enclosure.

On November 12, 2020, rhesus macaque rh2819 was given access to the enclosure directly adjacent to his own home enclosure. Thus, the animal's new living space is now 100% larger than that stipulated by the Guide for the Care and Use of Laboratory Animals and the AWAR. Recently, personnel from our Behavioral Services Unit paired rh2819 with an age-matched adult female macaque that he can live continuously. The animals appear to be compatible, and the plan is to move the pair to a larger enclosure in the near future and to add additional adult females to create a small breeding group.

We hope that this information provides you with the information necessary to conclude your review. Please contact me if you require anything further.

Sincerely,

(b) (6)

Nadine P. Connor, PhD
Institutional Official
Associate Vice Chancellor for Research Policy and Compliance
Professor, Surgery; Communication Sciences and Disorders
University of Wisconsin-Madison

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Friday, February 19, 2021 7:46 AM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: OLAW Case A3368-10K

Thank you for this update, (b) (6) Dr. Morse will send a response soon.
Axel Wolff

From: (b) (6)
Sent: Thursday, February 18, 2021 2:48 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: (b) (6)
(b) (6) Nadine Connor <nadine.connor@wisc.edu>; (b) (6)
(b) (6)
Subject: OLAW Case A3368-10K

Dr. Morse:

Please see the attached response letter from Nadine Connor @ UW-Madison. Thanks!

(b) (6)

DEPARTMENT OF HEALTH & HUMAN SERVICES

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FOR EXPRESS MAIL:
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6700B Rockledge Drive, Suite 2500
Bethesda, Maryland 20817
Telephone: (301) 496-7163
Facsimile: (301) 480-3387

January 7, 2021

Re: Animal Welfare Assurance
A3368-01 [OLAW Case 10K]

Dr. Nadine Connor
Associate Vice Chancellor
for Research Policy and Compliance
University of Wisconsin-Madison
(b) (4) Bascom Hall – 500 Lincoln Drive
Madison, WI 53706

Dear Dr. Connor,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your November 20, 2020 letter sent in response to our request for an investigation regarding allegations by People for the Ethical Treatment of Animals (PETA) of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Wisconsin National Primate Research Center. We have two follow-up questions to your responses. Specifically:

1. On page 7 of your response, under "*I., C. Failure to use appropriate methods to prevent injuries in monkeys." You state that "83% of rhesus macaques that are not exempted from being paired or grouped due to scientific reasons are socially housed.*"

   Please provide a short description of the social housing status of the remaining 17% of rhesus macaques and the other NHP species at the WNPRC.

2. On page 15, under *"IV., A., Stereotypic movement and other behaviors indicative of psychological distress vi." You state that "Macaque rh2819... will soon be moved to a larger enclosure..."*

   Please provide a timeline for the movement of this animal to a larger enclosure.

We appreciate your continued cooperation and ask that you please provide the requested information **by February 20, 2021**. Please contact me if I can be of assistance at morseb@mail.nih.gov .

Sincerely,

Brent C. Morse -S

Digitally signed by Brent C. Morse -S
Date: 2021.01.07 13:29:23 -05'00'

Brent C. Morse, DVM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC contact

Office of the Vice Chancellor for
Research and Graduate Education
UNIVERSITY OF WISCONSIN-MADISON

Brent C. Morse, DVM, DACLAM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health

November 20, 2020

Dear Dr. Morse,

On September 2, 2020, Alka Chandna of the People for the Ethical Treatment of Animals (PETA) sent a letter to Betty Goldentyer, DVM, Deputy Administrator of USDA-APHIS-Animal Care and yourself, outlining numerous instances of alleged noncompliance with Public Health Service Policy on Humane Care and Use of Laboratory Animals and the Guide for the Care and Use of Laboratory Animals allegedly committed by the Wisconsin National Primate Research Center (WNPRC). The alleged noncompliant events were witnessed, photographed, videotaped, and drawn from the WNPRC health records system by a PETA "associate" employed as an (b) (3) (A)

The six allegations contained in the PETA letter to OLAW and the USDA are enumerated below:

1. Failure to maintain a program of adequate veterinary care
2. Failure to minimize discomfort, distress, and pain experienced by animals
3. Failure to provide safe housing for nonhuman primates
4. Failure to "enhance animal well-being", to "facilitate the expression of species-typical behaviors", and to "promote psychological well-being" of the animals
5. Failure to provide appropriate training and instruction to personnel
6. Failure to maintain standards related to cleaning, sanitization, housekeeping and pest control of facilities where nonhuman primates are held.

Since receipt of the PETA complaint letter, a team of individuals from the WNPRC, the UW-Madison Research Animal Resources and Compliance Unit, the Office of the Vice Chancellor for Research and Graduate Education, the Office of Legal Affairs, the Office of the Vice Chancellor for University Relations, and the College of Letters and Sciences and Vice Chancellor for Research and Graduate Education Centers (LSVC) IACUC have thoroughly reviewed the allegations, the health records of the animals named in the complaint, as well as the 69 videos and 35 photos referenced in the complaint, and composed the following response to OLAW.

On November 11, 2020 the LSVC IACUC unanimously voted to accept all the information in this letter. Furthermore, the LSVC IACUC determined that none of the cases described by the PETA associate reflect programmatic failure within the animal care program, nor were they deemed reportable to OLAW. In its deliberations and in reaching these determinations, potential conflicts of interest were managed by asking LSVC IACUC members associated with the WNPRC, and any other WNPRC staff present at the meeting, to leave the virtual conference for the discussion and vote.

A. Failure to use appropriate methods to prevent, control, or effectively treat diarrhea in monkeys

***The PETA* associate *provided the identification numbers of 44 individual animals with reports of diarrhea and another 40 unidentified animals who the* associate *noted to have diarrhea during morning and/or afternoon observations.* What follows is a description of how WNPRC personnel monitor animals on a daily basis for evidence of diarrhea, how WNPRC veterinary personnel treat animals with diarrhea, and an overall synopsis of the 44 animals identified by the PETA associate.**

On a daily basis, a subset of the greater than 1600 nonhuman primates living at the WNPRC may have abnormal stool quality. Per WNPRC SOP 1.04 (Daily Animal Observations), technicians performing morning or afternoon health observations who discover an animal with abnormal stool, are trained to report one or more of the following stool conditions: bloody diarrhea (BD), bloody feces (BF), diarrhea (D), firm stool (FS), mucus (M), soft feces (SF), or watery diarrhea (WD). Technicians also have the option to pair an abnormal stool report with a comment indicating the amount of abnormal stool or evidence that the animal may be dehydrated. These reports are incredibly valuable as they allow veterinary staff to quickly triage which animals need to be addressed first each morning and afternoon. All abnormal stool entries are maintained in EHR within a "Diarrhea Calendar" for each animal. This calendar allows veterinary staff to monitor an animal's diarrhea frequency and response to treatment throughout its life.

Veterinarians and veterinary technicians reviewing daily observations are trained to immediately evaluate reports of bloody diarrhea, bloody feces, and/or mucus because they may be an indication of infection with pathogenic bacteria (i.e., Salmonella, Shigella, or Yersinia), protozoa (i.e., Giardia and Balantidium coli), and/or spiurids (i.e., Trichuris or Strongyloides). These pathogens are generally responsive to antibiotics, anti-protozoals, and anthelmintics provided by WNPRC veterinarians. Veterinary staff evaluate animals reported for bloody or mucus filled stool and generally collect a swab from the animal's rectum and a stool sample to submit for bacterial culture and parasitological evaluation, respectively. Frequently, animals presenting with blood or mucus filled stool are placed on treatment even before culture/fecal results return to ensure the health of the individual animal and the remainder of the colony. Additionally, animals with blood and mucus in their stool are evaluated for evidence of dehydration and treated with oral, subcutaneous, or intravenous rehydration fluids as needed. Like humans, many nonhuman primates experience infrequent, acute bouts of diarrhea of unknown origin that represent no long-term threat to the animal's health and resolve without therapy.

Per WNPRC policy, animals reported for soft feces, diarrhea, or watery diarrhea, receive a cage-side evaluation by veterinary staff on the day of the abnormal stool report to document the animal's hydration status and need for immediate care. If the animal appears stable, further diagnostics or clinical intervention may not be initiated until the animal exhibits three days of abnormal stool. On the third day of abnormal stool, a rectal swab and a stool sample are generally collected for bacterial culture and parasitological evaluation and the animal is treated according to the results of these tests and its hydration status.

Periodically, captive macaques experience diarrhea that has no discernible etiology and may become chronic. It is theorized that this type of diarrhea may be caused by multiple factors including dietary allergies, stress, and/or an imbalance of normal intestinal bacterial populations. Macaques with chronic diarrhea are often responsive to fiber supplementation, diet changes, probiotics, anti-protozoals like metronidazole, and antibiotics such as tylosin that possess immunomodulatory and anti-inflammatory properties. WNPRC animals with chronic diarrhea have this diagnosis placed in their problem list in EHR and are monitored on a frequent basis by veterinary staff for changes in stool quality, weight and hydration status. Frequently, young captive macaques experience chronic diarrhea of unknown etiology. If supported through their early years, this diarrhea often resolves and the animals grow normally and do not experience further gastrointestinal problems. Similarly, adult macaques may develop chronic diarrhea of unknown etiology as they age, but are able to maintain weight and hydration with supplemental feeding, probiotic and fiber treatment, and antibiotics like tylosin as described above. Currently, 74 (5.2%) of the 1412 macaques living at the WNPRC are categorized

- ***None*** of the 15 macaques diagnosed as chronic diarrhea animals experienced dehydration or required fluid therapy during the PETA associate's tenure at the WNPRC.
- During their tenure as an ART, the PETA associate ***did not*** discover any macaques with chronic diarrhea that had not already been identified by WNPRC personnel.
- It is not possible to comment on the remaining 40 animals reported for diarrhea by the associate as no animal identification numbers were provided. It is possible that many of these unknown animals were the same animals identified by the associate as the associate only worked on one floor of one building while employed by the WNPRC.

B. Failure to ensure that animals maintain a healthy weight

PETA provided the identification numbers of 43 individual rhesus macaques that received food supplementation at some point in their lives or were receiving food supplementation while the associate was employed as an ART. **What follows is a description of the methods WNPRC Veterinary Services personnel use to categorize the overall body condition of macaques, how personnel monitor body weight, and an overall synopsis of the 43 animals identified by the PETA associate as receiving supplemental feeding.**

The weight and overall body condition of an individual macaque in the WNPRC colony may be affected by a variety of factors such as age, social housing situation, experimental assignment, pregnancy status, and health condition. Thus, every animal living at the WNPRC is weighed on a frequent basis (WNPRC SOP 1.08 – Body Weight Measurements) and every macaque is given a body condition score (BCS) each time they undergo physical examination using a published scoring system employed by many of the National Primate Research Centers* (WNPRC SOP 3.09 – Physical Examinations and 3.09b Body Condition Scoring Chart). The BCS is determined based on the subjective grading scale outlined below:

WNPRC Body Condition Score Grading Scale			
1	Emaciated	3.5	Slightly Overweight
1.5	Very Thin	4	Heavy
2	Thin	4.5	Obese
2.5	Lean	5	Grossly Obese
3	Optimum		

*Clingerman KJ, Summers L. Validation of body condition scoring system in rhesus macaques (Macaca mulatta): inter- and intra-rater variability. J Am Assoc Lab Anim Sci. 2012 Jan;51(1):31-6. PMID 22330865.

Supplemental food (e.g., additional biscuits, biscuits soaked in palatable liquids [e.g., ensure, fruit juice, etc.], fruits, vegetables, or other highly palatable, high calorie food items) is provided to ensure the following:

- An animal's weight and BCS increase at an acceptable rate during pivotal growth phases
- An animal's weight and BCS remain stable when the animal is mature
- An animal receives appropriate nutritional support consistent with its clinical needs/condition (e.g., pregnancy, post-surgical recovery, experimentally induced or naturally acquired infectious disease, etc.).

To monitor the health of each animal in the colony, every weight and BCS collected is entered in EHR and veterinary staff review this data frequently and initiate appropriate treatment to maintain animals at a healthy body weight and a BCS range from 2-3.5. The number of biscuits each animal is required to receive each day is maintained in EHR and on a tag on each animal's enclosure to ensure that all animal care staff know how many biscuits to provide. Furthermore, the appetite of each animal in the colony is graded each day, documented in EHR, and reported to veterinary staff if abnormal. Veterinary staff monitor macaques on supplemental food closely to ensure they do not become overweight.

C. Failure to use appropriate methods to prevent injuries in monkeys

PETA alleges that the WNPRC failed to implement elementary measures to prevent monkeys from sustaining injuries, did not try to determine the cause of the injury to prevent such incidents from reoccurring, and knowingly left monkeys in circumstances where they were vulnerable to injury. The PETA associate identified 60 individual animals that were involved in 71 wounding events. **What follows is a description of the strategies utilized by WNPRC Behavioral Services personnel to establish that potential enclosure mates are compatible and an overview of the 60 socially housed animals who were reported with wounds.**

Macaque social environments are characterized by dominance hierarchies. In the wild, macaques live in large groups within a dominant matriline. The hierarchical nature of the social organization is established and maintained through a mixture of prosocial behaviors (i.e., grooming, food-sharing) and micro-aggressions. Policing of the social order is performed by the matriline and the dominant males within the group. Thus, social signaling through reciprocal aggressive-submissive interactions between animals is an important currency in establishing and maintaining the social dynamic.

Obviously, macaques require social opportunities in captivity as well. Per Chapter 3 of the Guide (Environment, Housing, and Management), "Social animals should be housed in stable pairs or groups of compatible individuals unless they must be housed alone for experimental reasons or because of social incompatibility." Similarly, per Part 3, Subpart D, Section 3.81 of the Animal Welfare Act Regulations, "Research facilities must develop, document, and follow an appropriate plan for environment enhancement adequate to promote the psychological well-being of nonhuman primates" and "the plan must include specific provisions to address the social needs of nonhuman primates." Thus, social housing is the primary component of the WNPRC's Environmental Enhancement Program created by Behavioral Services personnel and the unit strives to maintain the highest possible number of socially-housed animals by continuous creation and monitoring of paired and grouped animals. Currently, 83% of rhesus macaques that are not exempted from being paired or grouped due to scientific reasons are socially housed.

Pairing and grouping of macaques living at the WNPRC occurs using two primary strategies: Immediate and gradual pairing. Immediate pairing is employed with animals predicted to have a lower probability of aggressive interactions (e.g., weanlings or animals with history of general compatibility). Gradual pairing may be attempted using varying strategies. For example, we often house a prospective pair or group of animals under conditions that allow the animals to see each other through clear plexiglass dividers or interact with limited or "protected" contact by providing mesh panels through which animals can touch each one another. This gradual strategy may be employed for a week or two to ascertain compatibility. Several "test pairings" are often performed before the animals are given full access to each other.

Once introduced, Behavioral Services staff continue to monitor animals for a significant amount of time to ensure the pair/group remain compatible. Macaques are socially sophisticated and perform a number of behaviors to mediate social interaction through social aggression and submission. Thus, socialization is not without risk for potential injury. The dominance relationship is generally resolved through micro-aggression(s) that may result in a small amount of injury (e.g., abrasions, scratches, bruises, hair-pulling, etc.) as the animals work to establish a hierarchy. WNPRC ARTs and veterinary technicians are trained to observe animals for signs of injury and to report any sign immediately, no matter how small, to a primate center veterinarian. In turn, the veterinarians are trained to rapidly assess the animal(s) and provide appropriate care including but not limited to wound cleaning, suturing, and bandaging (if necessary) as well as antibiotics, anti-inflammatories, and analgesics. The extent of tolerable injury is determined through close interaction between Veterinary and Behavioral Services personnel. If incompatible behavior continues, the animals are separated and new partners are identified. All diagnoses, treatments, and resolutions of clinical and behavioral conditions are documented in EHR.

E. Other

***PETA's associate reported three additional events that did not fit under the other categories they utilized to enumerate their allegations.* A description of each one of these allegations and a response is provided below**

i. Macaque r09036 is an 11.4-year-old male member of the WNPRC rhesus breeding colony that exhibits chronic dermatitis, but little to no alopecia. He is currently on treatment with antibiotics, non-steroidal anti-inflammatories and fish oil capsules containing omega-3 fatty acids to manage his dermatological condition. Omega-3 fatty acids are known to decrease leukotrienes that may contribute to inflammation and dermatitis. The animal is rarely reported for evidence of active pruritus, thus, the current treatment regimen has been deemed effective by the WNPRC's veterinary staff. A biopsy of this animal's skin revealed lesions consistent with an auto-immune disorder and the next course of therapy will involve steroid treatment if the animal exhibits new evidence of discomfort.

ii. During a conversation with the PETA employee captured in video 2020-06-02_V1, an animal care supervisor recalled an incident where she believed lack of communication between animal care and veterinary personnel about the provision of supplemental formula may have resulted in the death of an infant. Review of records in the electronic health system revealed that this incident involved adult female macaque rh2509 and her infant r18074. Macaque r18074 was an infant rhesus that was born via c-section on 10/12/2018 because an ultrasonographic exam performed by WNPRC veterinary staff revealed that her mother (rh2509) may have experienced a placental abruption that could have compromised both the life of the mother and her unborn fetus. The infant was estimated to be approximately 13 days premature when delivered. Once rh2509 recovered from anesthesia, an attempt was made to immediately reintroduce the infant to her mother following WNPRC SOP 7.05 (Infant and Dam or Foster Dam Pairing). The mother did not show enough interest in the infant, so r18074 was moved to the WNPRC macaque nursery. Beginning on 10/15/2018, WNPRC Behavioral Services staff attempted to reintroduce r18074 to her mother on seven separate occasions (10/15, 10/16, 10/23, 10/24, 10/26, 10/29/ and 10/31). After each unsuccessful reintroduction attempt, the animal was returned to the nursery where, over a two-week period, it successfully transitioned from hand feeding by an animal caretaker to self-feeding from a bottle of formula hung in its incubator. The animal also demonstrated an acceptable weight gain during this period. On 10/31, rh2509 finally accepted the infant and it was noted to be nursing. Two supplemental formula feedings were provided to the infant on 11/1/2018, but further supplemental feedings were not ordered as it appeared that the infant was nursing from the mother. On 11/5/2018, the animal was reported for lethargy and veterinary staff ordered supplemental feeding to be offered twice that day. On 11/6/2018, the infant was reported for pale color, returned to the nursery, and treated with subcutaneous rehydration fluids. When the mother was anesthetized to remove the infant, it was verified that the mother was showing signs of adequate lactation. On 11/7/2018, the infant was active in the nursery incubator, but displayed signs of mild respiratory difficulty. Antibiotic treatment was instituted on 11/7, but the animal was found dead early in the morning on 11/8/2018. Histology results from tissues collected at necropsy revealed bacterial meningitis and encephalitis. Histology also revealed evidence of a congenital lack of lymphoid tissue. Culture of swabs taken from nervous system tissue at necropsy revealed heavy growth of *E. coli*. While *E. coli* meningitis is rarely diagnosed in animals at the WNPRC, it is the most common cause of gram-negative bacterial meningitis in humans and may have been a direct result of the infant's apparent congenital lymphoid deficiency.

iii. Macaque r19011 is a 1.7-year-old female offspring from the rhesus breeding colony that was diagnosed with dermatitis in June, 2020. The animal appears to be responding to fish oil capsules containing omega-3 fatty acids and will be continued on this treatment. Steroid therapy does not appear to be indicated at this time.

into the table-top restraint device as outlined in SOP 1.06 and its use is always followed by positive reinforcement.

As noted above, use of both the transport box and table-top restraint device are thoroughly outlined in WNPRC SOPs and rarely result in injury to the animals. Despite the fact that macaques may exhibit some evidence of distress while they are restrained in the table-top device, WNPRC Veterinary Services and Behavioral Services personnel believe that the employment of these devices for common daily husbandry, medical, and experimental procedures results in far less distress than that which would be associated with anesthetizing animals on a frequent basis to perform these same procedures. Furthermore, all personnel who employ the transport boxes and table-top restraints are thoroughly trained in the proficient and appropriate use of the devices.

c. The associate alleges that on May 7, 2020, an ART supervisor told her that in "years previous, an animal had been left in a cage that had been put into the cage wash" and "that she had gone behind the barrier and could hear the monkey screaming." There is no apparent audio or video recording of this conversation. No enclosure holding a macaque has ever been put into the cage washer in the 59-year history of the WNPRC and the center maintains detailed SOPs (SOP 2.02 - Automatic Cage Washer, SOP 2.13 - Sanitization of Animal Housing Areas) that outline the procedures that are utilized to ensure that only empty enclosures are delivered to the automatic cage washer.

d. On May 14, 2020, the WNPRC Training Coordinator performed a "hands-on primate training module" for two new ARTs including the PETA associate. During this module, the associate recorded three videos (2020-04-14 V2, V3, & V4) in which the coordinator made statements which PETA allege to be examples of mishandling of animals at the WNPRC.

   i. Video 2020-05-14 V2 contains audio of the coordinator cautioning the trainees about careful handling of marmosets because of an incident where an animal's leg was broken while it was being restrained for IACUC approved experimental procedures. This incident occurred on March 26, 2019, was reported via email to the USDA on April 8,2019, was reported via telephone to OLAW on April 12, 2019, and was reported to the UW LSVC IACUC during their monthly meeting on April 15, 2019. During a routine inspection, the USDA cited the UW-Madison for this incident under Section 2.38(f)(1) of the Animal Welfare Act Regulations. On July 22, 2019, UW-Madison's Institutional Official received a letter form OLAW stating, "OLAW understands that measures have been implemented to address this adverse event. OLAW concurs with the actions taken by the institution to comply with PHS Policy on Humane Care and Use of Laboratory Animals." All personnel involved with this incident were retrained using WNPRC SOP 1.06 (Physical Restraint Methods) and no similar events have occurred post-incident.

   ii. Video 2020-05-14 V2 also contains audio of the WNPRC training coordinator stating that she has hand-captured common marmosets that have exited from their enclosures and that employees have to wear leather gloves to catch the animals because "they will cut you." The coordinator is referring to the fact that marmosets do have sharp claws and teeth and that they can scrape or bite personnel when they are hand-restrained unless personnel utilize the leather gloves provided in each room. Despite our best efforts, common marmosets infrequently exit their enclosures when the enclosures are opened to perform husbandry, medical, or experimental procedures. WNPRC SOP 1.13 (Capture of Loose Nonhuman Primates) clearly defines the steps to follow if a marmoset exits its enclosure, a transport device, or a restraint device.

   iii. Video 2020-05-14 V3 contains audio of the training coordinator informing the trainees about checking each marmoset's ID neck tag when they are weighed to ensure the tag is not too tight. The coordinator states that if the neck tags are tight, "the animals start to grow around their neck tags." The coordinator was formerly a veterinary technician assigned to the marmoset area and has

was sedate enough to be removed from the box by hand. As can be seen from associate's video 2020-07-02 V1, the staff remained calm and quickly recaptured the dam without animal or human injury. Events like this are infrequent and staff are trained to remain calm and to react quickly to the situation as reflected in the video.

iv. Video 2020-07-02 v5 shows an ART supervisor tattooing a young infant. Both the supervisor and the associate incorrectly believed the infant was "waking up" from anesthesia when in actuality it was exhibiting common tonic/clonic involuntary muscle movement associated with dissociative anesthetics such as ketamine. There is no evidence that the animal was in distress or exhibiting any response to pain and the anesthetic induced movement did not interfere with completion of the tattooing procedure. All animals receive an anti-inflammatory agent after they undergo tattooing.

g. On July 14, 2020, the associate alleges that she heard an ART scream when the conscious infant jumped off of the anesthetized dam she was weighing. This incident is not captured on any video collected by the associate. The infant was quickly recaptured and was not injured. Infrequently, infants will leave their anesthetized dams while the pair are being weighed. The ART has been counseled about being more vigilant while weighing conscious infants.

h. On July 21, 2020, an ART informed the associate that two young rhesus macaques exited their primary enclosure when a lock was not placed on the enclosure after cage sanitization. A review of the incident report that was filed for this event and a review of the animals' records revealed that neither of the animals were injured while they were outside of their primary enclosure. The WNPRC Attending Veterinarian always informs the LSVC IACUC and the UW-Madison Attending Veterinarian whenever an animal is injured after exiting its primary enclosure and the UW Attending immediately informs OLAW of these incidents. Only two animals have been injured after exiting their primary enclosure in 2020. The WNPRC Incident Prevention Committee reviews every animal exit and is constantly working to reduce animal exits to zero.

i. On July 23, 2020, animal rh2538 was anesthetized with ketamine for Tb testing and a physical examination. The ART believed the animal was sedate and opened the transport box that was being used to move the animal to the examination room. The animal exited the transport box, but was quickly recaptured as the ketamine took full effect, and the animal was safely transferred to the examination room.

III. Failure to provide safe housing for nonhuman primates

***PETA alleges that their associate observed or became aware of two incidents that suggest that the WNPRC failed to comply with Guide recommendations pertaining to the provision of safe housing for nonhuman primates.* A description of these two events and a response are provided below.**

a. Video 2020-04-20 V3 contains footage of an ART supervisor advising the associate about how important it is to place the appropriate size dividers between the individual compartments in the mobile animal enclosures and to close and lock the doors that hold the dividers in place. The supervisor is providing this advice to help the associate learn how to prevent animals from exiting their primary enclosures. To reduce animal exits, WNPRC implemented SOP 1.19 (In-Room and Lock Checks) in 10/16/2013. This SOP requires that every lock on every enclosure housing a monkey must be checked every day between 1330 and 1500 and the person documenting this check must initial the room maintenance schedule located outside of every animal room door. WNPRC SOP 2.13 (Sanitization of Animal Housing Areas) was amended in 6/14/2019 to state that a second person who did not participate in cage sanitization must confirm all cage door and panel locks are present and properly secured. As noted above in Section II. h., only two animals have been injured after exiting their primary enclosure in 2020.

time directly in front of each monkey during the recording process. Entry-level ARTs are trained from the beginning of their employment to be respectful of each monkey's space and to not engage in behaviors that could induce stress; the associate clearly disregarded this directive to obtain video footage. Further evidence that this PETA associate was not aware of natural macaque behavior is evident as this section of the complaint notes that "monkeys avoided eye contact with the associate." Rhesus macaques respond to a direct stare as a threat and entry level ARTs are trained to never look directly into an animal's eyes for an extended period.

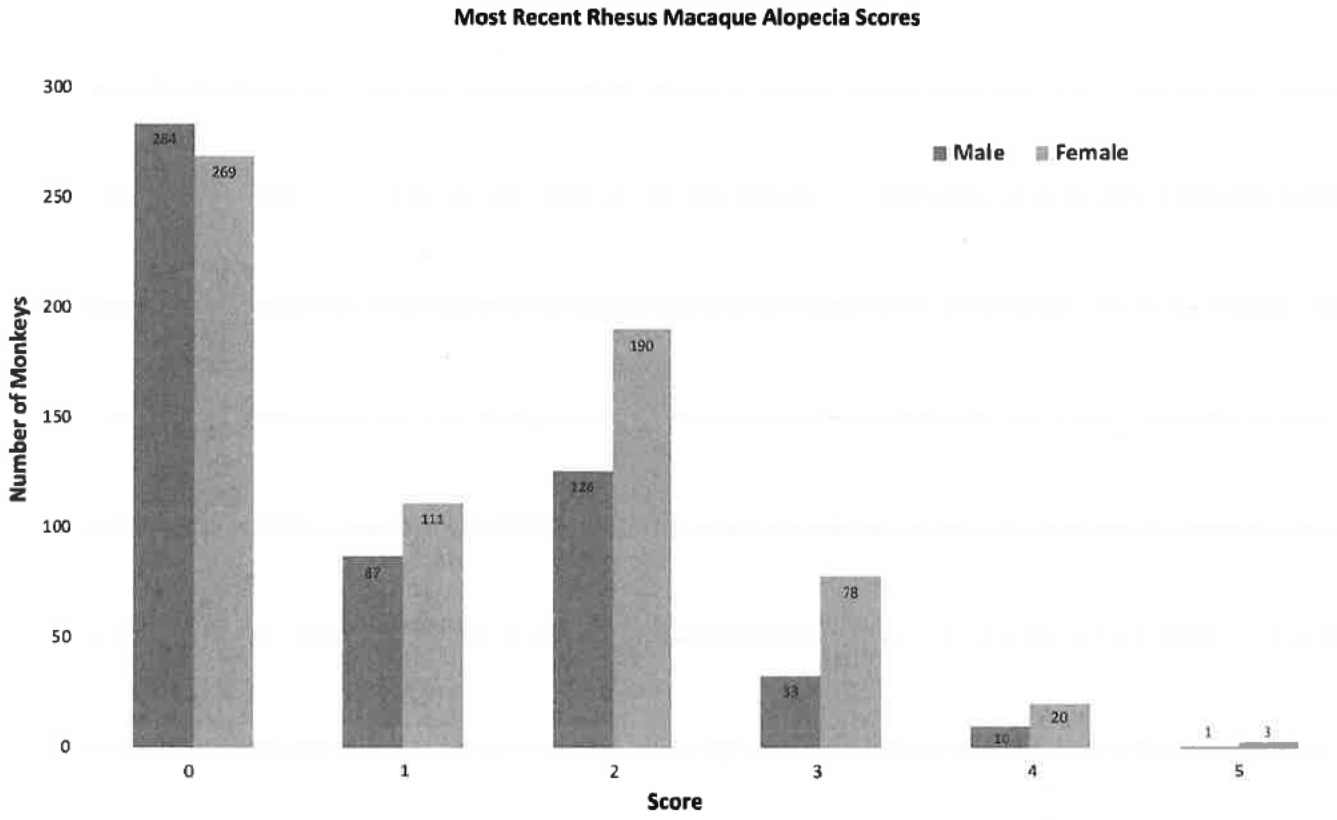
ii. & iii. On March 22, and April 10, 2020 the associate recorded and observed various adolescents vocalizing, clinging, rocking, and making facial cues. The room where video 2020-03-28_V1 was recorded and where the observations were made houses social groups of adolescents that have recently been weaned from mothers. The behaviors observed and recorded by the associate are typical of young, socially housed rhesus macaques in a natural setting. Weaned offspring generally socialize in same-sex groups and engage in play, mock fighting, and mock sexual behavior as they mature. When captive groups of juveniles feel threatened (e.g., by an associate who stands too close to their enclosure to record video), they will vocalize and huddle. Thus, the behaviors the associate observed and recorded were normal and species-typical.

vi. Macaque rh2819 is a 9.2-year-old male member of the WNPRC rhesus breeding colony that the associate recorded on several occasions engaged in a locomotor stereotypy best characterized as "bobbing." This animal exhibits patchy alopecia and receives extra enrichment items in his enclosure (e.g., coconuts, wood, etc.) to stimulate species-typical foraging behavior and to alleviate excessive self-grooming. The animal is weight stable, is paired often with females for breeding purposes, and will soon be moved to a larger enclosure in an attempt to extinguish his bobbing behavior.

x. Macaque r10033 is a 10-year-old, WNPRC-born male rhesus monkey that was raised in the nursery for one month after his mother exhibited poor maternal care. In the spirit of the 3Rs, this animal has been assigned to multiple projects throughout his life to reduce the overall number of animals needed for experiments at the WNPRC. As a two-year-old, this animal was assigned to an experimental protocol that utilized imaging procedures, sample collections (i.e., blood and cerebrospinal fluid), and psychological evaluations to compare brain structure/function, hormone levels, and behavior in cohorts of mother-reared vs. nursery-reared rhesus macaques. ***None of the nursery-reared infants in this study were separated from their mothers for experimental purposes; rather, the animals were placed in the nursery because their mothers were ill or exhibited poor maternal care.*** As a four-year-old, r10033 was utilized in a Dengue virus vaccine trial. As a nine-year-old, this animal was fitted with a collar and trained to walk to, and sit in, a standard nonhuman primate restraint device to facilitate semen collection via electroejaculation. Semen from this animal was used by scientists utilizing *in vitro* fertilization to study gene editing techniques. Recently, r10033 has become a member of the WNPRC rhesus macaque breeding colony. The animal has spent 45% of his life in social housing. Despite multiple attempts to maintain the animal in a social group with adult females, WNPRC Behavioral Services personnel have not yet been able to find this animal a compatible long-term partner. He is now paired intermittently with adult females for breeding purposes. Other than intermittent reports of dry skin on his face and lips and mild alopecia on his back and arms (treated with an anti-inflammatory and fish oil supplements) and a prolonged bout of diarrhea early in life that was responsive to fiber treatment, this animal has had no major clinical issues. It appears that the PETA associate mistook this animal's calm nature as depression. Furthermore, the associate failed to realize that this animal frequently and voluntarily presents his neck to the front of his enclosure (see videos 2020-06-28_V2 & 2020-06-29_V4) because he was trained with positive reinforcement techniques to present his neck collar to personnel for attachment to a pole that was used to walk him to a restraint chair for semen collection. He was so well-trained and willing to perform this behavior that he continues to present his neck even though he is no longer fitted with a collar or assigned to the

WNPRC Alopecia Scoring System	
0	No alopecia
1	Mild thinning of haircoat, but underlying skin not visible
2	25% of haircoat has alopecia
3	50% of haircoat has alopecia
4	75% of haircoat has alopecia
5	90% or more of the haircoat has alopecia

The bar graph below demonstrates the most recent alopecia score data from the WNPRC's colony of rhesus macaques. **The data clearly demonstrates that only a small portion of the population exhibits significant alopecia (i.e., alopecia scores of 4 or 5).**



Nonhuman primates living in social situations in the wild and captivity are often observed grooming one another. While primates in the wild most definitely self-groom and groom one another to remove parasites from their skin, grooming behavior in the wild and in captivity has also been shown to reduce stress in social groups and between pairs. At times, in the wild and in captivity, animals may overgroom and even pull hair from their social partners. The WNPRC ARTs are trained to report all cases of significant alopecia and over-grooming/hair pulling to personnel of the Veterinary and Behavioral Services staff. Veterinary and Behavioral Services staff, in turn, attempt to diagnose the cause of alopecia (i.e., is it medical or behavioral, or both) and attempt to implement clinical (e.g., medicated shampoo, topical anti-inflammatories, antibiotics, etc.) and/or behavioral treatments (e.g., providing extra enrichment devices, changing an animal's social situation, etc.) to resolve the issue. Every alopecia score obtained, all treatments, and the result of all treatments are documented in each animal's electronic health record.

PETA and their associate have misconstrued comments made by WNPRC training (Video 2020-04-02_V7) and Behavioral Services personnel. The trainer's comment, "Usually, once an animal is marked for alopecia

since she arrived at the WNPRC and has been pregnant or nursing an infant for an extended period of time. Despite exhibiting chronic alopecia, all the blood work performed on this animal has been within normal limits, her weight is stable (body condition score = 2.5), and serial physical examinations have revealed no abnormalities. The animal is currently living with her most recent offspring and has been provided additional foraging opportunities since December, 2018. We predict her hair coat will return when we wean her latest infant in May, 2021. Behavioral Services personnel will continue to try to find this animal a compatible partner, but thus far she has had aggressive interactions with the females with whom she has been paired.

xi. Macaque rh2973 is a 7.7-year-old female rhesus monkey assigned to an IACUC approved research project. She had an alopecia score of 5 in March, 2020, but has responded well to increased foraging opportunities implemented in July, 2020 and her alopecia score has improved to 3.

xiv. Macaque r02034 is an 18.5-year-old female member of the rhesus breeding colony that has had nine offspring and is currently housed with her most recent offspring and adult female r02026. This animal has an alopecia score of 5, but is weight stable, and had no abnormalities noted on her most recent blood work. A recent bout of diarrhea was responsive to probiotic therapy. Macaque r02026 is an 18.6-year-old member of the rhesus breeding colony that has had six offspring. Despite having an alopecia score of 4 (which is down from 5 since January, 2020), this female has a body condition score of 3.0, and is gaining weight. Both r02034 and r02026 have been receiving increased foraging opportunities since December of 2018. The two animals have been housed together (except for when they are paired with a male for breeding) since 2003, exhibiting no signs of incompatibility even when one or both are pregnant or nursing an infant, and exhibit no abnormal behaviors. Thus, personnel of both the Behavioral Services and Veterinary Services see no behavioral or clinical reason to separate the animals.

xvii. Macaque r14098 is a 6-year-old male member of the rhesus breeding colony that is weight stable (body condition score = 3). This animal received an alopecia score of 4 at his last physical exam and as a result he is being provided additional foraging opportunities to reduce any self-over-grooming behavior. Despite the fact that the associate took the time to record an image of this animal's hair coat, and observed the animal pulling its own hair, they did not make a report in the electronic health records system.

Despite the fact that the PETA associate enumerated several animals and rooms of animals exhibiting alopecia, the individual never entered a report of alopecia in the electronic health record system for the entire length of their employment at the WNPRC. Nor did the associate inform a veterinary technician or veterinarian of these observations. Only once, did the associate discuss alopecia with a Behavioral Services member. More worrisome was the fact that the associate identified a specific animal that was pulling on its own hair (r14098), but failed to make a health report for this animal.

C. Incompatible Cage Mates

In this section of the complaint, PETA alleges that the WNPRC's failure to ensure that monkeys caged together were compatible resulted in monkeys sustaining painful and traumatic injuries.

As noted in Section I.C. (Failure to use appropriate methods to prevent injuries in monkeys), macaques often engage in micro-aggressions to establish and maintain social order. This is evident in the group-housed adolescent macaques captured in videos 2020-04-17_V05 & V06 where an animal care supervisor patiently teaches the PETA associate how to perform morning health observations. It is common for young rhesus macaques in the wild and in captivity to engage in rough play, mock fighting, true fighting, and mock sexual behavior to establish dominance and to establish a full repertoire of species-typical behaviors. These behaviors may often result in scratches, abrasions, and bruising. **WNPRC animal care, veterinary, and behavior personnel monitor the extent of these injuries, separate animals if aggression escalates into incompatibility, and treat all injuries accordingly.**

The PETA associate also alleges that the fact that a macaque restraint device was present in (b) (4) is evidence that animal care staff is not trained well. (b) (4) houses Zika virus infected pregnant females enrolled in a variety of studies to elucidate the pathogenesis of the virus on fetuses in an effort to establish efficacious treatment regimens and possibly a vaccine. Removing Zika-infected females from the room could create a potential for cross contamination with other breeding animals living on the same floor, thus the infected animals are isolated to this room and all experimental procedures are performed within the animal housing room. The animals are acclimated to the restraint device using positive reinforcement from a very young age and generally enter the device voluntarily. In (b) (4) the device is used to perform ultrasound exams and blood draws in the pregnant females. These procedures are performed rapidly and the other animals housed in the room are acclimated to observing and experiencing the routine procedures.

VI. Failure to maintain standards related to cleaning, sanitization, housekeeping, and pest control

The PETA associate alleged that "WNPRC workers frequently commented that rooms smelled of feces" and that "the pervasive odor could stem from the recurrent and chronic diarrhea suffered by so many monkeys at WNPRC, but regardless of the origin, the persistent smell would certainly compromise the welfare of the monkeys forced to 'live' in those rooms." A description of the WNPRC sanitation and pest management programs and a response to the allegations are provided below.

The WNPRC Colony Management Unit maintains a rigorous daily cleaning and sanitization program of the primate center's animal housing and support areas that strictly adheres to Animal Welfare Act regulations and recommendations of the Guide for the Care and Use of Laboratory Animals. As mandated by the Animal Welfare Act, each animal enclosure and the waste pan below it is completely cleaned of food debris and animal waste on a daily basis (WNPRC SOP 2.01 – Cleaning Animal Areas and Equipment). Every two weeks, each enclosure is sanitized with both detergent and disinfectant to eliminate the possibility of the growth of microorganisms that could be hazardous to the health of the animals (WNPRC SOP 2.13 – Sanitization of Animal Housing Areas). The efficacy of the sanitization process is verified by swabbing the enclosures to detect Adenosine Triphosphate, or ATP, the energy molecule found in all organic material, including bacteria and human tissue (WNPRC SOP 2.03 – Sanitation Checks Using a Luminometer). Determining the amount of ATP present is the best indicator to determine if an environmental surface is clean or not and is the same system used in human hospitals and restaurants. Any enclosure that does not pass ATP testing are re-sanitized and any animal caretakers whose enclosures fail testing are re-trained.

In addition to the cleaning and sanitization program, the WNPRC also employs an Integrated Pest Management (IPM) Program (WNPRC SOP 6.07 Pest Control and Monitoring). A commercial pest company performs routine facility inspections to discover and seal all cracks and crevices, to perform daily harborage removal, and to place pheromone-impregnated glue traps to eliminate pests. Colony Management personnel check all traps on a daily basis and pest company personnel check the traps during their weekly visit. All pest sightings are documented in a logbook and reported to pest control company personnel by the Colony Manager or Animal Care Supervisors. As stipulated in the IPM, the pest company responds to all pest reports within 24 hours. The cleanliness of the WNPRC animal areas is reviewed daily by the center's Colony Management Staff. Additionally, the entire WNPRC cleaning and sanitization program is fully evaluated by members of the LSVC IACUC semi-annually, at least annually by the USDA, every three years by AAALAC, and every five years by the center's NIH funding body.

PETA alleges that the "persistent odor of feces compromised the welfare" of the primates housed at the WNPRC. All pens in livestock barns, displays at zoological gardens, and enclosures at veterinary clinics collect feces overnight, thus, it can be expected that the housing rooms at the WNPRC would have some odor in the morning as feces collect in the waste pans; after the daily morning cleaning, the odor abates. Furthermore, the ventilation system of each WNPRC building generates at least 10-15 air changes per hour in each animal room, which also facilitates the control of common odors present in a nonhuman primate facility.

Morse, Brent (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Saturday, November 21, 2020 9:40 AM
To: (b) (6)
Cc: (b) (6) Nadine Connor; (b) (6) OLAW Division of Compliance Oversight (NIH/OD); Morse, Brent (NIH/OD) [E]
Subject: RE: Reply from Nadine Connor, IO, re: OLAW Case A3368-10K

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you for providing this response to our request for information. We will review the provided information and send an official follow-up soon.

Best regards, Brent Morse

Brent C. Morse, DVM, DACLAM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health

From: (b) (6)
Sent: Friday, November 20, 2020 2:34 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: (b) (6) Nadine Connor <nadine.connor@wisc.edu> (b) (6)
Subject: Reply from Nadine Connor, IO, re: OLAW Case A3368-10K

Dr. Morse:

Please see the attached reply from Nadine Connor, IO, re: OLAW Case A3368-10K. Thanks!

(b) (6)

Morse, Brent (NIH/OD) [E]

From: Kosub, David (NIH/OD) [E]
Sent: Monday, September 21, 2020 8:02 AM
To: Morse, Brent (NIH/OD) [E]; Brown, Patricia [OLAW] (NIH/OD) [E]; Wolff, Axel (NIH/OD) [E]
Cc: OER Press Group
Subject: RE: FYI - Wisconsin NPRC

Follow Up Flag: Follow up
Flag Status: Flagged

And for reference, here is University of Wisconsin's response: https://news.wisc.edu/peta-misrepresents-uw-madison-lab/
David

From: Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>
Sent: Wednesday, September 16, 2020 10:05 AM
To: Kosub, David (NIH/OD) [E] <david.kosub@nih.gov>; Brown, Patricia [OLAW] (NIH/OD) [E] <brownp@od.nih.gov>; Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>
Cc: OER Press Group <OERPressGroup@mail.nih.gov>
Subject: RE: FYI - Wisconsin NPRC

Hi David,

ORIP and OLAW are aware of the allegations and OLAW has received an official request from PETA for an investigation.

Best regards, Brent

Brent C. Morse, DVM, DACLAM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health

From: Kosub, David (NIH/OD) [E] <david.kosub@nih.gov>
Sent: Wednesday, September 16, 2020 9:55 AM
To: Brown, Patricia [OLAW] (NIH/OD) [E] <brownp@od.nih.gov>; Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>; Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>
Cc: OER Press Group <OERPressGroup@mail.nih.gov>
Subject: FYI - Wisconsin NPRC

FYI – sharing this press release from an animal advocacy group regarding the Wisconsin NPRC for awareness.
I'm not sure if ORIP has been contacted
David

DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:
Office of Laboratory Animal Welfare
6700B Rockledge Drive, Suite 2500, MSC 6910
Bethesda, Maryland 20892-6910
Home Page: http://grants.nih.gov/grants/olaw/olaw.htm

FOR EXPRESS MAIL:
Office of Laboratory Animal Welfare
6700B Rockledge Drive, Suite 2500
Bethesda, Maryland 20817
Telephone: (301) 496-7163
Facsimile: (301) 480-3387

September 18, 2020

Re: Animal Welfare Assurance
A3368-01 [OLAW Case 10K]

Dr. Nadine Connor
Associate Vice Chancellor
for Research Policy and Compliance
University of Wisconsin-Madison
(b) Bascom Hall – 500 Lincoln Drive
Madison, WI 53706

Dear Dr. Connor,

The Office of Laboratory Animal Welfare (OLAW) has received from People for the Ethical Treatment of Animals (PETA) allegations of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at the Wisconsin National Primate Research Center as outlined in the attached document. It is possible that such occurrences should have been reported directly to our office as required by the PHS Policy and per your commitment to do so in your Animal Welfare Assurance.

Specifically, we request information regarding the six numbered allegations in the letter:

1. Failure to maintain a program of adequate veterinary care;

2. Failure to minimize discomfort, distress, and pain experienced by animals;

3. Failure to provide safe housing for nonhuman primates;

4. Failure to "enhance animal well-being", to "facilitate the expression of species-typical behaviors", and to "promote psychological well-being" of the animals;

5. Failure to provide appropriate training and instruction to personnel, and;

6. Failure to maintain standards related to cleaning, sanitization, housekeeping and pest control of facilities where nonhuman primates are held.

Please instruct the IACUC, avoiding any conflict of interest, to send a report, signed by you as the Institutional Official, to the following OLAW email inbox: OLAWdco@od.nih.gov and provide a description of the occurrences and all corrective/preventive actions. Please have them consider if any of the occurrences represented programmatic failures. You are welcome to provide summaries of any institutional policies, SOPs, etc. that address these alleged failures. If other reportable non-compliances have occurred during this period, please also include them with the report if OLAW has not already been notified.

We appreciate your cooperation and ask that you please provide the requested information **by November 20, 2020**. Please contact me if I can be of assistance at morseb@mail.nih.gov.

Sincerely,

Brent C. Morse -S

Digitally signed by Brent C. Morse -S
Date: 2020.09.21 09:21:17 -04'00'

Brent C. Morse, DVM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC contact

We appreciate your cooperation and ask that you please provide the requested information **by November 20, 2020**. Please contact me if I can be of assistance at morseb@mail.nih.gov.

Sincerely,

Brent C. Morse -S

Digitally signed by Brent C. Morse -S
Date: 2020.09.21 09:21:17 -04'00'

Brent C. Morse, DVM
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare

cc: IACUC contact

Morse, Brent (NIH/OD) [E]

From: (b) (6)
Sent: Friday, September 4, 2020 10:59 AM
To: Morse, Brent (NIH/OD) [E]
Subject: RE: Concerns from PETA regarding treatment of monkeys at the Wisconsin NPRC:

Good morning, Dr. Morse,

Thank you very much for your kind acknowledgement of my letter, and thanks especially for investigating our concerns.

(b) (6)

From: Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>
Sent: Friday, September 4, 2020 10:46 AM
To: (b) (6)
Subject: RE: Concerns from PETA regarding treatment of monkeys at the Wisconsin NPRC:

Hello (b) (6)

OLAW has received your letter, will investigate and take any appropriate actions.

Sincerely, Brent Morse

Brent C. Morse, DVM, DACLAM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
Ntional Institutes of Health

(b) (3) (A), (b) (6)

Morse, Brent (NIH/OD) [E]

From: Morse, Brent (NIH/OD) [E]
Sent: Friday, September 4, 2020 10:51 AM
To: Walker, Keri (NIH/OD) [C]
Subject: FW: Concerns from PETA regarding treatment of monkeys at the Wisconsin NPRC:
Attachments: WNPRC_Complaint from PETA to OLAW, September 2, 2020.pdf

Hello Keri,

Please use this email and attached file to open a new case for A3368. No hurry. This will take a while. Thank you.

Brent

Brent C. Morse, DVM, DACLAM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
Ntional Institutes of Health

From: Morse, Brent (NIH/OD) [E]
Sent: Friday, September 4, 2020 10:46 AM
To: (b) (6)
Subject: RE: Concerns from PETA regarding treatment of monkeys at the Wisconsin NPRC:

Hello (b) (6)

OLAW has received your letter, will investigate and take any appropriate actions.

Sincerely, Brent Morse

Brent C. Morse, DVM, DACLAM
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
Ntional Institutes of Health

(b) (3) (A)

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