



October 26, 2023

Deborah Kearse
Director
Division of Program Integrity
Office of Management Assessment
National Institutes of Health

Re: DPI Case Number 2021-017

Via e-mail: deborah.kearse@nih.gov

Dear Director Kearse:

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 globally—to share additional disturbing information to supplement our complaint dated February 17, 2021,¹ which the Division of Program Integrity (DPI) assigned case number 2021-017, and our related complaints dated November 18, 2021,² and March 14, 2022.³

Based on the latest evidence presented below and the evidence described in our former complaints, cumulatively over \$9 million in taxpayer money and at least 25,000 animals' lives were apparently wasted by institutions funded by the National Institutes of Health (NIH) during their COVID-19 pandemic operations. We urge your office to investigate and, if noncompliance is corroborated, ensure that experimenters funded by NIH adhere to federal mandates to reduce or replace the use of animals in experiments and stop wasting public resources to support activities related to the acquisition, breeding, confinement, maintenance, repopulation, and use in experiments of animals deemed by experimenters to be “extraneous,” “nonessential,” or “noncritical” or described using similar terminology.

¹PETA. Letter to NIH OMA. February 17, 2021. Accessed January 4, 2023. https://www.peta.org/wp-content/uploads/2021/02/2021-02-17_Follow_up_letter_to_OMA_HHS.pdf

²PETA. Letter to NIH OMA/DPI. November 18, 2021. Accessed January 4, 2023. https://www.peta.org/wp-content/uploads/2022/03/2021-11-18_Complaint-update_NIH-OMA_DPI.pdf

³PETA. Letter to NIH OMA. March 14, 2022. Accessed January 4, 2023. <https://www.peta.org/wp-content/uploads/2023/01/2022-03-14-nih-oma-dpi-complaint-update.pdf>

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History of PETA’s Complaints Regarding Euthanasia of Animals Deemed Extraneous

On June 15, 2020, we submitted a detailed complaint to the U.S. Department of Health and Human Services Office of Inspector General (HHS-OIG) regarding the troubling problem of universities across the country that deemed many of their NIH-funded experiments and the animals used in them “extraneous” or described them using similar terminology in response to the COVID-19 pandemic, resulting in the euthanasia of such animals confined to laboratories and a massive waste of taxpayer funds.⁴

On June 23, 2020, we were notified by HHS-OIG Public Affairs that our complaint had been forwarded to the then-director of NIH’s Office of Management Assessment (OMA), Michael D. Shannon,⁵ to which we received no reply. On February 17, 2021, we submitted a new complaint⁶ addressed to Acting Director of OMA Meredith Stein, CPA, which was assigned case number 2021-017 by NIH’s DPI on February 17, 2021. We then acquired additional evidence that animals were being deemed “extraneous” and euthanized in NIH-funded experiments, which we detailed in letters to you on November 18, 2021,⁷ and on March 14, 2022,⁸ to supplement the aforementioned complaints.

New Information That Supplements Our Complaints

Experimenters affiliated with the NIH-funded institutions mentioned below have acknowledged that euthanasia of animals deemed extraneous to the experiments occurred in response to the COVID-19 pandemic, similar to the numerous institutions we had detailed in our original and supplementary complaints:

- **University of Georgia**

Experimenter Wendy Watford of the University of Georgia (UGA) conducted protocols funded by the National Institute of Allergy and Infectious Diseases titled “Regulation of Mucosal Immunity to Respiratory Viruses by Tpl2” (NIH project number 5R21AI147003-02),⁹ and “Defining the Mechanisms by Which Placenta-Specific 8 (Plac8) Facilitates CD8 Memory Formation” (NIH project number

⁴PETA. Request to HHS OIG regarding COVID-19 contingency plans at U.S. universities. June 15, 2020. Accessed March 10, 2022. <https://www.peta.org/wp-content/uploads/2020/06/20-06-15-Request-to-HHS-OIG-regarding-COVID-19-contingency-plans-at-US-universities.pdf>

⁵HHS-OIG Public Affairs RE: RE: For HHS OIG, from PETA—re request for investigation into apparent waste at NIH and failure to reduce/replace animal use. June 23, 2020. Accessed March 10, 2022. https://www.peta.org/wp-content/uploads/2021/02/2020-06-23_For-HHS-OIG-from-PETA-re-request-for-investigation.pdf

⁶PETA. Letter to NIH OMA. February 17, 2021. Accessed March 10, 2022. https://www.peta.org/wp-content/uploads/2021/02/2021-02-17_Follow_up_letter_to_OMA_HHS.pdf

⁷PETA. Complaint update. November 18, 2021. Accessed January 27, 2023. https://www.peta.org/wp-content/uploads/2022/02/2021-11-18_Complaint-update_NIH-OMA_DPI.pdf

⁸PETA. Complaint update. March 14, 2022. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/2022-03-14-nih-oma-dpi-complaint-update.pdf>

⁹NIH. RePORTER. Regulation of mucosal immunity to respiratory viruses by Tpl2. Accessed July 5, 2022. <https://reporter.nih.gov/search/x60VgnBNK0K0u8ALbRr0BQ/project-details/9926820>

5R21AI138027-02),¹⁰ both of which have received \$188,750 each in taxpayer funding. Per its COVID-19 response plan, UGA directed research staff to plan to “[c]ull animals not needed.”¹¹ As a result, mice assigned to Watford’s protocols were euthanized. This was verified in a set of records from UGA^{12,13} in response to PETA’s public records request.¹⁴ The euthanasia of these animals seemingly contradicts the statement provided by UGA’s vice president for research, David Lee, who claimed that no animals who were to be experimented on were killed at that point during the pandemic.¹⁵

- **West Virginia University**

On March 18, 2020, the Research Office of West Virginia University (WVU) issued a notification addressing the “Cessation of On-Site Research,” asking that experimenters “stop performing on-site research” and “tend to animals/cell lines.” An additional directive instructed biomedical experimenters that “in the event that depopulation procedures need to be put in place in the future, researchers should identify ... specific animals [who] are critical to their research.”¹⁶ In alignment with this directive, it’s apparent that animals deemed extraneous or unnecessary were killed to reduce animal populations during the pandemic operations. In records obtained in response to PETA’s records request,¹⁷ a draft of a document titled “Stabilization of Mouse and Rat Breeding Colonies During a Prolonged Disaster or Furlough” states, “[B]reeding may be allowed to continue and the young weaned as usual until available space or personnel become a limited resource. Once that point is reached, *un-weaned animals, determined not to be critical, shall be humanely euthanized* Subsequently, *new neonates < 5 days of age will continue to be euthanized* until the end of the disaster or furlough period”¹⁸ [*emphasis added*].

¹⁰NIH. RePORTER. Defining the mechanisms by which Placenta-specific 8 (Plac8) facilitates CD8 memory formation. Accessed July 5, 2022.

<https://reporter.nih.gov/search/x60VgnBNK0K0u8ALbRr0BO/project-details/9833488>

¹¹UGA. UGA University Research Animal Resources (URAR) and Researcher Pandemic Service Reduction Plan. March 13, 2020. Accessed July 5, 2022.

https://research.uga.edu/docs/units/urar/UGA_URAR_service_reduction_plan_COVID-19_20200323.pdf

¹²UGA. Responsive records. PETA.org. Accessed July 5, 2022. https://www.peta.org/wp-content/uploads/2022/07/Watford-1_Redacted.pdf

¹³UGA. Responsive records. PETA.org. Accessed July 5, 2022. https://www.peta.org/wp-content/uploads/2022/07/Watford-2_Redacted.pdf

¹⁴Flaughner K. Records Request. PETA.org. April 26, 2022. Accessed July 5, 2022.

<https://www.peta.org/wp-content/uploads/2022/07/2022-04-26-university-of-georgia-request.pdf>

¹⁵Payne S. OPINION: UGA researchers need humane COVID-19 plan for animals. RedAndBlack.com. May 27, 2020. Accessed July 5, 2022. https://www.redandblack.com/opinion/opinion-uga-researchers-need-humane-covid-19-plan-for-animals/article_3099a688-9ffd-11ea-9490-7b72af6f715c.html

¹⁶WVU. Research Office. Info letter. March 18, 2020. Accessed January 27, 2023.

<https://www.peta.org/wp-content/uploads/2023/01/wvu-research-office-letter.pdf>

¹⁷Flaughner K. Records request. PETA.org. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/peta-records-request-wvu.pdf>

¹⁸WVU. Stabilization of mouse and rat breeding colonies during a prolonged disaster or furlough. PETA.org. Accessed September 1, 2023. <https://www.peta.org/wp-content/uploads/2023/01/Stabilization-of-Mouse-and-Rat-Breeding-Colonies.pdf>

A March 17, 2020, e-mail with the subject line “Clarification—FROM DIRECTOR OF OLAR/ATTENDING VETERINARIAN” stated, “Please assess your animal colonies and *remove any extra animals* . . . [Office of Lab Animal Resources] OLAR has already had requests to maintain researchers’ colonies because labs are shutting down”¹⁹ [*emphasis added*].

An e-mail on March 19, 2020, with the subject line “Lindsey lab mice” stated, “Dr. Lindsey (Orthopaedics) [*sic*] has 13 mice in room V-308 [3 mice] & V-309 [10 mice]. He has advised that we can *euthanize all of them*”²⁰ [*emphasis added*]. A representative from experimenter Brock Lindsey’s laboratory also submitted an “Elective Euthanasia Form” for two cages of mice.²¹

WVU’s “Health Sciences Center Animal Facility Training” document states, “All cages with animals to be euthanized must be labeled by laboratory personnel with blue cage cards, available from the OLAR staff . . . OLAR Staff will euthanize only the animals indicated.”²² Furthermore, experimenter Heath Damon signed an “Elective Euthanasia Form” on March 17, 2020, to eliminate “6 to 8 cages” of mice.²³ These animals were likely deemed extraneous due to circumstances imposed by the COVID-19 pandemic.

- **Pennsylvania State University**

In an American Association for Laboratory Animal Science (AALAS) thread on April 10, 2020, titled “What is it like working in high COVID-19 areas,” Pennsylvania State University staffer Michelle Irish stated, “I am gutted by the mass euthanasia I’ve both witnessed and been directed to do.”²⁴ This statement seemingly confirms that animals deemed extraneous were euthanized at the institution as a result of the COVID-19 pandemic.

- **Tulane University**

In an AALAS thread on April 10, 2020, titled “What is it like working in high COVID-19 areas,” Tulane University staff member Amy Pierce stated, “We have not required any researchers to euthanize their animals but some have to keep their colonies manageable while they are working remotely.”²⁵ This quote suggests that

¹⁹WVU. E-mail: FROM DIRECTOR OF OLAR/ATTENDING VETERINARIAN. PETA.org. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/FROM-DIRECTOR-OF-OLAR-ATTENDING-VETERINARIAN.pdf>

²⁰WVU. E-mail: Lindsey lab mice. PETA.org. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/lindsey-lab-mice-email.pdf>

²¹WVU. Elective euthanasia form. PETA.org. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/lindsey-elective-euthanasia-form.pdf>

²²WVU. OLAR. Health Sciences Center Animal Facility Training. PETA.org. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/Health-Sciences-Center-Animal-Facility-Training.pdf>

²³WVU. Elective euthanasia form. PETA.org. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/damron-elective-euthanasia-form.pdf>

²⁴AALAS thread. “What is it like working in high COVID-19 areas.” PETA.org. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/aalas-psu.pdf>

²⁵AALAS thread. “What is it like working in high COVID-19 areas.” PETA.org. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/aalas-tulane.pdf>

animals may have been euthanized at the institution at the discretion of individual experimenters as a result of the COVID-19 pandemic.

- **Montana State University**

An article published by Sentient Media on May 29, 2020,²⁶ makes reference to Montana State University (MSU) records that include directives to euthanize mouse colonies and “Animal Resources Center (ARC) Daily Animal Health Information” documents related to guinea pigs, stating, “[A]ll animals euthanized. Room empty.”²⁷ Furthermore, a set of responsive public records that we received from another institution includes a March 31, 2020, e-mail that mentions that only 15% to 20% of MSU’s laboratories were approved as “essential” that are continuing in a “much reduced” manner²⁸—indicating that the remaining laboratories at MSU were not approved as “essential” and may have reduced animal populations in response to circumstances resulting from the COVID-19 pandemic. When this information was presented to MSU, it responded by stating, “All labs conducting animal research were covered in the ‘15–20%’ that were deemed to be essential.” The university proceeded to claim that it “cannot speak for the Sentient Media author’s interpretation of events, but MSU Animal Resource Center records reflect that the euthanizing of animals during that time period were for reasons other than COVID-19 impacts, such as the conclusion of an experiment.”²⁹ However, it is statistically unlikely that *all* ongoing experiments on animals were considered essential and comprised the 15% to 20% of essential research on campus, given the university directive on March 26, 2020, to transition to Level 2 operations, which entailed “pausing research when possible, or developing a plan for modified operations when research is deemed essential per guidelines.”³⁰

- **University of Wisconsin–Milwaukee**

According to the University of Wisconsin–Milwaukee’s “Emergency Operations Center COVID-19 Operations Planning Report,” dated June 14, 2020, campus operations were transitioned to more restrictive remote work. As such, plans were in place for restarting campus operations, including research.³¹ In an AALAS thread on March 18, 2020, with the subject line “Animal care during shelter in place restrictions,” UW-Milwaukee’s Jennifer Nemke asked, “Are staff still being allowed to access the facility to care for the animals? Are others of you planning for this

²⁶Oliver L. The sac rack: Death’s waiting room for animals in labs. Sentient Media. May 29, 2020. Accessed January 27, 2023. <https://sentientmedia.org/the-sac-rack-deaths-waiting-room-for-animals-in-labs/>

²⁷ARLO. MSU. Accessed January 27, 2023. <https://arlo.riseforanimals.org/entity/montana-state-university-2034/records/4971>

²⁸Carter J. E-mail re essential labs at MSU. PETA.org. Accessed January 27, 2022. <https://www.peta.org/wp-content/uploads/2023/07/MSU-essential-labs-email.pdf>

²⁹Peterson K. Public records request. May 13, 2022. PETA.org. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/msu-email-no-animals-euthanized.pdf>

³⁰MSU. Archived messages and updates. Accessed July 31, 2023.

<https://www.montana.edu/health/coronavirus/archived-comms.html#email29>

³¹UWM Emergency Operations Center. COVID-19 Operations Planning Report. June 14, 2020. Accessed January 27, 2023. https://uwm.edu/coronavirus/wp-content/uploads/sites/515/2020/06/UWM-Emergency-Operations-Center-Report_Final.pdf

scenario? Aside from sleeping on a cot in my office *or euthanizing all of the animals*, are there other options”³² [*emphasis added*].

Furthermore, in response to PETA’s public records request for records related to animals who were euthanized due to the restrictions imposed during pandemic operations,³³ university staff confirmed that “[t]he [Institutional Review Board] IRB office indicated that 65 of the animals on the attached census sheets were euthanized due to COVID restrictions on personnel in the labs.”^{34,35}

- **Ferris State University**

On March 11, 2020, Ferris State University President David L. Eisler issued an “Important Update for Faculty Staff” regarding the initiation of modified campus operations in light of the COVID-19 pandemic.³⁶ According to responsive records that PETA received from the university pursuant to public records requests related to animals who had been euthanized due to these modified pandemic operations,^{37,38} animals assigned to different experimental protocols were euthanized.³⁹ In an e-mail on March 25, 2020, the university’s animal care facility director, Richard Marble, stated, “I am currently drawing down the last of the colonies and preparing the facility for restart once all of you restart. After today there will be no animals left in the facility.”⁴⁰ Furthermore, in an e-mail thread on March 19, 2020, with the subject line “Animal Care Going Forward in Light of Yesterdays [*sic*] Message,” a university member, whose name is redacted, wrote, “I am fine with euthanizing all animals at this point. All of the male rats will be too large and there is no reason to continue to maintain them. Nor the frog or turtle.” This staff member added, “In terms of my animals, I can always purchase new rats later.”⁴¹ In another e-mail thread on March 23, 2020, titled “Animal care facility essential staff,” a university member, whose

³²Nemke J. AALAS thread “Animal care during shelter in place restrictions.” PETA.org. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/uw-milwaukee-aalas-thread.pdf>

³³Flaughner K. Records request. PETA.org. April 15, 2022. Accessed January 27, 2023.

<https://www.peta.org/wp-content/uploads/2023/01/2022-04-15-uw-milwaukee-request.pdf>

³⁴UW-Milwaukee. Responsive records. Census sheets. PETA.org. Accessed January 27, 2023.

<https://www.peta.org/wp-content/uploads/2023/01/2022-05-13-census.pdf>

³⁵UW-Milwaukee. Re: public records request. PETA.org. Accessed January 27, 2023.

<https://www.peta.org/wp-content/uploads/2023/01/uw-milwaukee-response-email.pdf>

³⁶Eisler D. Important Update for faculty staff. March 11, 2020. Ferris.edu. Accessed January 27, 2023.

<https://www.ferris.edu/HTMLS/news/coronavirus/message-to-faculty-staff-mar11-2020.htm>

³⁷Flaughner K. Records request. PETA.org. April 26, 2022. Accessed January 27, 2023.

<https://www.peta.org/wp-content/uploads/2023/01/2022-04-26-ferris-state-university-request.pdf>

³⁸Flaughner K. Records request. PETA.org. June 22, 2022. Accessed January 27, 2023.

<https://www.peta.org/wp-content/uploads/2023/01/2022-06-22-ferris-state-university-request.pdf>

³⁹Ferris State University. Responsive records. PETA.org. Accessed January 27, 2023.

<https://www.peta.org/wp-content/uploads/2023/01/2022-07-15-documents-obtained.pdf>

⁴⁰Ferris State University. E-mail. PETA.org. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/02/richard-marble-email.pdf>

⁴¹Ferris State University. Email: Animal Care Going Forward in Light of Yesterdays [*sic*] Message. PETA.org. Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/Animal-Care-Going-Forward-in-Light-of-Yesterdays-Message-email.pdf>

name is redacted, wrote, “It is our plan to have all animals euthanized and the facility shutdown by the end of the week.”⁴²

- **Texas Tech University Health Sciences Center El Paso**

In an AALAS discussion thread on March 22, 2020, titled “Who Is Suspending All or Most Animal Research,” Texas Tech University Health Sciences Center El Paso experimenter Chris Boehm discussed a sticker system to help make decisions about euthanizing animals and stated, “We also euthanized about 80% of my training colony.”⁴³

That these laboratories had animals deemed by experimenters to be “unnecessary,” “nonessential,” “noncritical,” or “extraneous” or described with similar terminology in the first place should raise significant red flags. Given the widespread euthanasia of these animals because of COVID-19 at universities across the country and the large amount of NIH funding that these individual institutions receive in research grants, taxpayers should not have to foot the bill for such waste.

Apparent Failure of NIH-Funded Protocols to Reduce and Replace Animal Use

The presence of such animals in these institutions’ laboratories flies in the face of existing regulations to minimize animal use in experiments.

NIH-supported language to minimize animal use in experiments 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 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*].⁴⁴
- 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*].⁴⁵

⁴²*Id.*

⁴³Boehm C. AALAS thread “Who is suspending all or most animal research?” Accessed January 27, 2023. <https://www.peta.org/wp-content/uploads/2023/01/ttuhsc-aalas-thread.pdf>

⁴⁴Office of Laboratory Animal Welfare. NIH. Health Research Extension Act of 1985, Publ. L. No. 99-158. Accessed January 27, 2023. <https://olaw.nih.gov/policies-laws/hrea-1985.htm>

⁴⁵NIH. NIH Revitalization Act of 1993, Publ. L. No. 103-43. Accessed March 10, 2022. <https://grants.nih.gov/grants/olaw/pl103-43.pdf>

- 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].⁴⁶
- 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].⁴⁷

When these institutions’ experimenters buy, breed, trap, and/or use animals who at any time—not just during the COVID-19 pandemic—can be deemed “extraneous” or described using similar terminology, they squander limited research funds, much of which come from taxpayers, and flout the foundational “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 “nonessential” animals used in the aforementioned experiments should have been zero from the start, since they weren’t relevant to the protocols led by these institutions’ employees. Also, because taxpayer funds were used to acquire, breed, confine, and/or maintain these animals who were deemed “extraneous” (or described using similar terminology) and then so readily euthanized and disposed of in response to the COVID-19 pandemic, these institutions should reimburse the funding agencies for this fiscal waste instead of seeking compensation for losses incurred.

Furthermore, the Congressional Research Service has found that during the COVID-19 pandemic, “[s]uspending research may result in additional costs for activities such as animal care” and that “[r]estarting research, when conditions permit, may also incur costs for staff time and supplies to ... reestablish laboratory animal populations.”⁴⁸ Taxpayers should not be responsible for the additional costs associated with “reestablishing laboratory animal populations,” since these institutions deemed many of them 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.

Given this new supplementary information, we urge your office to investigate and take appropriate actions. Furthermore, we urge you to respond to our full request

⁴⁶NIH. 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. Accessed March 10, 2022. <https://www.ncbi.nlm.nih.gov/books/NBK54048/>

⁴⁷NIH. 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. Accessed March 10, 2022. <https://www.ncbi.nlm.nih.gov/books/NBK54048/>

⁴⁸Congressional Research Service. Effects of COVID-19 on the federal research and development enterprise. April 10, 2020. Accessed March 10, 2022. <https://crsreports.congress.gov/product/pdf/R/R46309>

detailed in our HHS-OIG complaint dated June 15, 2020, and to our subsequent NIH OMA complaints dated February 17, 2021, November 18, 2021, and March 14, 2022, respectively.

As we have reiterated in our past complaints, if noncompliance is corroborated, we ask that you ensure that the experimenters adhere to federal mandates to reduce and/or replace the use of animals in experiments. There is no justification for continuing to waste public resources to support activities related to the acquisition, breeding, confinement, maintenance, repopulation, and/or experimentation of animals in laboratories who are deemed “extraneous,” “nonessential,” or “noncritical” or described using similar terminology and subsequently killed.

Thank you for your consideration of this important matter. You can contact me at ShriyaS@peta.org. We look forward to your reply.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Shriya Swaminathan', with a stylized flourish at the end.

Shriya Swaminathan
Science Policy Advisor
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Laboratory Investigations Department