



April 3, 2026

Jacquelyn Tubbs, DVM
Acting Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health

Via e-mail: Jacquelyn.Tubbs@nih.gov; olawdco@mail.nih.gov

Dear Dr. Tubbs:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 10.4 million members and supporters worldwide to respectfully request that the Office of Laboratory Animal Welfare (OLAW) investigate apparent noncompliance with the Institutional Animal Care and Use Committee (IACUC) composition requirements set forth in the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy) and the *Guide for the Care and Use of Laboratory Animals* (the *Guide*) at Oregon Health & Science University (OHSU; PHS-Approved Animal Welfare Assurance D16-00195).

Section IV.A.3 of the PHS Policy sets out requirements for IACUC composition. In particular, Section IV.A.3.b provides that the "committee shall consist of no fewer than five members, and shall include at least: ... (3) one member whose primary concerns are in a nonscientific area (e.g., ethicist, lawyer, and member of the clergy); and (4) one individual who is not affiliated with the institution in any way other than as a member of the IACUC, and is not a member of the immediate family of a person who is affiliated with the institution." The *Guide* stipulates similar requirements pertaining to the composition of the IACUC.

The *Guide* further states: "For large institutions with many administrative units or departments, no more than three voting members should be associated with a single administrative unit (USDA 1985). The size of the institution and the nature and extent of the Program will determine the number of members of the committee and their terms of appointment. Institutions with broad research programs may need to choose scientists from a number of disciplines and experience to properly evaluate animal use protocols."

However, as detailed in the attached Appendix, the composition of OHSU's IACUC does not appear to satisfy the two provisions above. First, while the IACUC includes a community member as required by Section IV.A.3.b.4 of PHS Policy, it does not appear to include a member whose primary concerns are in a nonscientific area. Additionally, the IACUC consists of 15 members: 10 directly affiliated with the Oregon National Primate Research Center (ONPRC), 4 from other OHSU departments, and 1 unaffiliated community member. This composition appears to substantially exceed the limit on representation from a single administrative unit.

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- PETA Germany
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The apparent concentration of ONPRC-affiliated members on OHSU's IACUC raises serious concerns about whether the committee satisfies the safeguards outlined by the *Guide*, intended to promote balanced protocol review and minimize institutional conflicts of interest. The limitation on representation from a single administrative unit is a core structural protection designed to ensure independent oversight of animal use and to prevent the committee from being dominated by members associated with a single research enterprise.

Accordingly, we respectfully request that OLAW:

1. Review the current composition of OHSU's IACUC for compliance with PHS Policy and the *Guide*; and
2. Take appropriate compliance action if the committee is found to be improperly constituted.

Thank you for your attention to this matter. We appreciate OLAW's role in ensuring that research facilities maintain IACUC structures consistent with PHS Policy and the *Guide*. Please let us know if additional information would assist your review.

Sincerely,



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**APPENDIX: Current Membership of Oregon Health & Science University's
Institutional Animal Care and Use Committee with PHS Policy-Prescribed Designations**

No.	Name	Title/Affiliation	Designation
1	Kristine Coleman	Research Assistant Professor, ONPRC; Chair, OHSU IACUC	Chair, Scientist
2	Jeff Stanton	Attending Veterinarian, ONPRC	Veterinarian
3	Eliot Spindel	Professor, ONPRC	Scientist
4	Brandon Wilder	Associate Professor, ONPRC	Scientist
5	Theodore R. Hobbs	Associate Professor, ONPRC	Scientist
6	Kristin A. Sauter	Research Assistant Professor, ONPRC	Scientist
7	Meredith Kelleher	Assistant Professor, ONPRC	Scientist
8	Lauren Drew Martin	Associate Professor, ONPRC	Scientist
9	Lisa Houser	Division of Comparative Medicine, ONPRC	Scientist
10	Denise Urbanski	Research Librarian, ONPRC	Scientist
11	Joan Phillips	Research Integrity Specialist and Post-Approval Monitoring, OHSU	Scientist
12	Kaetlin Merriman	Director, Animal Care and Use Program, OHSU	Scientist
13	Harjinder Sardar	Biosafety Officer, OHSU	Scientist
14	Kimberly Ray	Assistant Research Integrity Officer, IACUC, OHSU	Scientist
15	Sandra Larson-Rhodes	n/a	Unaffiliated Member