



April 3, 2026

Bernadette Juarez
Deputy Administrator
Animal Care
Animal and Plant Health Inspection Service
U.S. Department of Agriculture

Via e-mail: Bernadette.R.Juarez@USDA.gov; ac.complaints@usda.gov

Dear Ms. Juarez:

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 U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) investigate apparent noncompliance with the Institutional Animal Care and Use Committee (IACUC) composition requirements set forth in the Animal Welfare Act (AWA) and its associated Animal Welfare Regulations (AWRs) at Oregon Health & Science University (OHSU; USDA Certificate No. 92-R-0001).

Section 2.31(b) of the AWRs sets out requirements for IACUC composition. In particular, Section 2.31(b)(4) provides that “[i]f the Committee consists of more than three members, not more than three members shall be from the same administrative unit of the facility.” The regulations define “administrative unit” as “the organizational or management unit at the departmental level of a research facility.” However, as detailed in the attached Appendix, OHSU’s 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 regulatory limit on representation from a single administrative unit.

ONPRC constitutes an “administrative unit” within the meaning of Section 2.31(b)(4). ONPRC is not merely a shared research program or informal collaborative group; rather, it is a formally designated National Primate Research Center supported through infrastructure funding from the National Institutes of Health. It operates under centralized executive leadership with its own director, administrative hierarchy, veterinary infrastructure, and animal facilities. It functions as a discrete organizational component within OHSU with responsibility for a major portion of the institution’s nonhuman-primate research enterprise and maintains its own internal governance and operational structure comparable to that of a departmental unit.

Moreover, ONPRC personnel align through common reporting structures, research administration, animal resources programs, and facility oversight systems. These features reflect precisely the type of “organizational or management unit at the departmental level” contemplated by § 2.31(b)(4). Treating ONPRC as anything other than a single administrative unit would

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- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

undermine the regulation's purpose of preventing disproportionate representation by individuals from a single research entity whose activities are subject to IACUC review.

The apparent concentration of ONPRC-affiliated members on OHSU's IACUC raises serious concerns about whether the committee satisfies the AWA's safeguards 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 APHIS Animal Care:

1. Review the current composition of OHSU's IACUC for compliance with § 2.31(b); and
2. Take appropriate compliance or enforcement action if the committee is found to be improperly constituted.

Thank you for your attention to this matter. We appreciate APHIS Animal Care's role in ensuring that research facilities maintain IACUC structures consistent with the Animal Welfare Act and its implementing regulations. 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**

**Members Directly Affiliated with the Oregon National Primate Research Center
(ONPRC)**

1. Kristine Coleman, Chair
2. Jeff Stanton, Attending Veterinarian
3. Denise Urbanski
4. Eliot Spindel
5. Brandon Wilder
6. Theodore R. Hobbs
7. Kristin A. Sauter
8. Meredith Kelleher
9. Lauren Drew Martin
10. Lisa Houser

Members Affiliated with Oregon Health & Science University (Non-ONPRC Units):

11. Kaetlin Merriman
12. Harjinder Sardar
13. Kimberly Ray
14. Joan Phillips

Community Member:

15. Sandra Larson-Rhodes