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November 10, 2026

Stephanie Murphy, V.M.D., Ph.D.
Director, Office of Research Infrastructure Programs
National Institutes of Health
[redacted]

**RE: Request to Withhold WaNPRC P51 Renewal Pending Independent Audit**

Dear Dr. Murphy,

The University of Washington (UW) is asking the National Institutes of Health (NIH) to commit another five years of P51 funding to the Washington National Primate Research Center (WaNPRC) even as UW is beginning an independent audit to determine the extent of what its Attending Veterinarian, Christina Cruzen, called an "egregious failure of adequate surgical and pathology record keeping." At the October 15, 2026, meeting of UW's Institutional Animal Care and Use Committee (IACUC), Cruzen and IACUC members disclosed missing and inaccurate records, departures from approved procedures, interference with veterinary oversight and treatment, and serious harm to monkeys. Cruzen said UW does not know the depth of the record failures and estimated that determining their extent would require "quite literally at least a year of work."[1]

UW submitted its competing five-year P51 renewal application in early 2026, and NIH's P51 review team visited WaNPRC in June. By the time of that site visit, a February neurosurgery had ended in what UW records describe as a "best guess craniotomy."[2] Separately, concerns involving interference with veterinary authority and restrictions on veterinary and behavioral staff's access to monkeys were under investigation.[3] UW has stated that it subsequently notified NIH about these matters. NIH should now compare what UW disclosed with the fuller record presented at the October 15 IACUC meeting, including years of interference with veterinary authority and the Attending Veterinarian's account that researchers disregarded veterinary medical advice so routinely that veterinarians eventually stopped offering it. NIH should determine what UW disclosed, when it disclosed it, and whether that disclosure accurately conveyed the duration, severity, and scope of the problems.

We ask NIH not to approve the pending P51 renewal. NIH should consider any further P51 funding only after UW's independent audit is complete and NIH has reviewed its findings.

**Record Failures and Their Implications for NIH-Funded Research**

The review that prompted UW's call for an audit was limited. UW's Attending Veterinarian examined four necropsy reports, and all four contained significant errors, including the wrong sex, age, and species of an animal and inaccurate

[1] October 15, 2026 IACUC meeting, 1:47:45–1:50:21
[2] October 15, 2026 IACUC meeting, 51:57-52:09
[3] October 15, 2026 IACUC meeting, 2:08:35-2:09:36

information about project assignments, implants, and clinical conditions. She also found surgical records that did not accurately document approved procedures, postoperative observations, and imaging.[4] UW's audit must determine the full extent of these deficiencies in WaNPRC's animal records. NIH must then determine what the findings mean for federally funded research that relied on WaNPRC animals, procedures, and records.

In one case, a monkey continued to be used in neurological experiments while a chronic infection around his cranial implant destroyed surrounding bone and spread into his brain. IACUC members questioned whether his condition affected his performance in experimental trials and the interpretation of the data collected from him.

**Scope of NIH-Funded Research at WaNPRC**

NIH also cannot limit its review to the neuroscience laboratories in which some of these problems were identified. WaNPRC is an NIH-supported national research resource used across scientific disciplines, funding mechanisms, and institutions. An NIH RePORTER search identifies more than $50 million in current-year funding for active UW primate-related projects, including R01 grants, U-series cooperative agreements, P-series program and center awards, developmental awards, career-development awards, and fellowships. The research spans neuroscience and vision, HIV/AIDS, infectious disease, vaccine development, pregnancy and fetal disease, gene and stem-cell therapies, aging, and other fields.

UW should be required to identify the animals, protocols, investigators, and projects associated with records found to be deficient and provide that information to NIH. NIH, as the federal funder, must then determine what those findings mean for the NIH awards that supported or relied on that work, including awards to investigators at other institutions.

**NIH's Prior P51 Restrictions, Subsequent Advisory Board and Internal Findings**

In 2018, NIH restricted WaNPRC's P51 in response to problems involving leadership, veterinary staffing, and institutional support. NIH prohibited expenditure of P51 funds until UW submitted an acceptable corrective plan, while allowing funds needed for veterinary services and animal care.[5]

In 2024, WaNPRC's own National Scientific Advisory Board (NSAB) reported "multiple instances of organizational dysfunction, bordering on chaos," financial systems "in disarray," and reporting lines that were "unclear and counterproductive." It warned that these problems could "undermine the science, the funding base, and the operation of the Primate Center." The NSAB also reported that not every monkey who died or was euthanized received a necropsy and raised concerns about pathologists working remotely rather than spending sufficient time onsite.[6] NIH received these findings in September 2025, when PETA asked it to withhold further federal funding for primate experimentation at WaNPRC and specifically alerted NIH that the P51 was approaching renewal.[7] At the October 15 IACUC meeting, members discussed responsibility at the principal investigator, WaNPRC leadership, and institutional levels. UW's Institutional Official was consulted while the February brain surgery was underway, but months later UW still could not determine who authorized the surgery to continue with the "best guess craniotomy" using a device that did not fit the skull or whether the Institutional Official herself had approved it. She later joined Attending

[4] October 15, 2026 IACUC meeting, 1:41:17-1:43:25

[5] 2018 NIH correspondences with UW regarding restrictions to WaNPRC P51 award

[6] 2024 WaNPRC NSAB report

[7] September 2025 PETA letter to NIH "WaNPRC's current five-year P51 award runs only through April 2027, leaving no realistic scenario in which the Center can stabilize before its renewal is submitted for NIH review and decision. The NSAB's findings point to only one conclusion: planning must begin now for an orderly wind-down of the WaNPRC and for the long-term care of the monkeys. Anything less would disregard the judgment of NIH's own external scientific advisors and risk prolonging a crisis that is already well-documented."

Veterinarian Christina Cruzen in concluding that the surgical and pathology recordkeeping failure was egregious. Mari Ostendorf, UW's Vice Provost for Research, is the principal investigator of P51OD010425, a role NIH has said carries "ultimate responsibility for the conduct of NPRC operations."[8] NIH should determine what senior UW officials knew during the 2026 renewal process and what UW disclosed to NIH.

**We ask NIH and ORIP to:**

1. **Restrict the current P51 award while UW's audit proceeds,** while preserving funding necessary for veterinary care and the health and welfare of the monkeys, as NIH did in 2018.
2. **Do not award P51OD010425-66 while UW's independent audit remains pending.** Once the audit is complete, NIH should determine whether the findings support any further P51 funding.
3. **Require UW to provide NIH with the complete independent audit** and supporting findings, including the records examined, deficiencies identified, the basis for those findings, and corrective actions taken.
4. **Review UW's representations and subsequent notifications to NIH** against what UW officials and investigators knew at the time, including whether UW accurately conveyed the duration, severity, and scope of the interference with veterinary authority and the recordkeeping and surgical failures.
5. **Require UW to trace deficient records to the animals, protocols, investigators, projects, and federal awards involved, including awards at other institutions, and provide its findings to NIH for appropriate grant-compliance action.**
   We are providing NIH with the October 15 IACUC recording, the May 2024 NSAB report, the 2018 P51 restriction correspondence, and our October 29 letter to the UW Board of Regents. We ask NIH to review these materials and take immediate action regarding the current P51 and the pending FY66–70 renewal.

Sincerely,



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[8] 2018 NIH correspondences with UW regarding restrictions to WaNPRC P51 award see pg.2