



January 13, 2023

Brent C. Morse, D.V.M.
Director
Division of Compliance Oversight
Office of Laboratory Animal Welfare
National Institutes of Health

Via e-mail: MorseB@mail.nih.gov

Dear Dr. Morse:

We believe that the federal Animal Welfare Act violation documented in the attached U.S. Department of Agriculture inspection report for Johns Hopkins University (JHU) constitutes a violation of the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy). Last year, JHU received \$839,852,301 from the National Institutes of Health (NIH), and according to NIH, an estimated 47% of those funds supported projects that involved experiments on animals.

In 1985, members of Congress from both sides of the aisle worked together to strengthen protections for animals in laboratories in order to address deep-seated ethical concerns held by the American public regarding the use of animals in experiments. Polling by the Pew Research Center found that more than 50% of U.S. adults oppose the use of animals in experiments, and other surveys suggest that the support of the shrinking group that continues to accept animal experimentation is contingent on the existence and enforcement of stringent regulations aimed at protecting animals.

As you know, institutions that receive funding from Public Health Service agencies—including NIH—are required to comply with PHS Policy. Failure to do so violates not only federal animal welfare guidelines and policies but also public expectations that facilities receiving tax dollars to use animals—who are capable of experiencing pain, distress, love, and companionship and value their lives just as we value ours—at the very least observe minimal standards aimed at ensuring some modicum of animal welfare.

We ask that your office investigate the incident outlined in the attached report.

Thank you for your time and consideration.

Sincerely yours,

Shriya Swaminathan
Science Policy Advisor
International Laboratory Methods
Laboratory Investigations Department

Enclosure

USDA inspection report of JHU, dated December 6, 2022

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

Washington
1536 16th St. N.W.
Washington, DC 20036
202-483-PETA

Los Angeles
2154 W. Sunset Blvd.
Los Angeles, CA 90026
323-644-PETA

Norfolk
501 Front St.
Norfolk, VA 23510
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Info@peta.org
PETA.org

Entities:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)



Inspection Report

Johns Hopkins University
720 Rutland Avenue
Ross 459
Baltimore, MD 21205

Customer ID: **81**
Certificate: **51-R-0006**
Site: 003
JOHNS HOPKINS UNIVERSITY,
THE

Type: ROUTINE INSPECTION
Date: 06-DEC-2022

2.33(b)(3) Repeat
Attending veterinarian and adequate veterinary care.

On December 7th, 2022 during the USDA facility inspection, a female baboon was observed to have a round approximately quarter sized wound located on the on the left heel. The baboon was observed shifting weight between the right and left feet and lifting the left foot. Upon review of study observation records, the laboratory staff observed bilateral pressure ulcers on the feet on December 5th and applied Bacitracin.

The laboratory staff did not inform the RAR veterinary staff about the bilateral ischial pressure abrasion until the scheduled weekly rounds on Wednesday December 7th. After rounds with the laboratory members, a RAR veterinarian observed the baboon and noted ulceration on both hind feet. The laboratory staff had started a treatment plan of Bacitracin and pain medication on December 5th. The treatment plan was reviewed by the RAR veterinary staff on December 7th.

Daily observations may be done by someone other than the attending veterinarian provided there is a mechanism for direct and frequent communication on problems of animal health and behavior. The mechanism for reporting daily observations must ensure direct and frequent communication with the Attending Veterinarian to allow for a timely and accurate diagnosis and treatment of health issues.

Corrected during the time of inspection.

Prepared By: GLORIA MCFADDEN
USDA, APHIS, Animal Care
Title: VETERINARY MEDICAL OFFICER

Date:
15-DEC-2022

Received by Title: Attending Veterinarian

Date:
15-DEC-2022



Inspection Report

2.38(f) Critical

Miscellaneous.

Procedures under a traumatic brain injury study were conducted on August 26th, 2022 and August 31, 2022. One study rabbit was euthanized after demonstrating significant neurological deficits. The necropsy revealed an abscess at the incision site. On September 5, 2022, a veterinary resident noticed dehiscence of the incision for another study rabbit. A RAR veterinarian identified another study rabbit with an infection at the incision site. All three rabbits were euthanized. Upon further investigation by the veterinary staff, it was determined that the research staff was not appropriately following the established aseptic procedures during the surgeries. An IACUC investigation cited inadequate aseptic technique, inadequate postsurgical monitoring, and not following the established humane endpoint parameters.

Handling of all animals shall be done as carefully as possible in a manner that does not cause trauma or physical harm. The research facility did not ensure research staff performed procedures in accordance with the protocol and facility policies. The research facility must ensure research staff have knowledge of and follow all facility policies and procedures for conducting research so that study animals are handled in a manner that prevents physical harm or distress. An appropriate corrective action plan was implemented that included retraining, veterinary oversight, and a new location for performing the surgery.

This inspection and exit interview were conducted with facility representatives and the IO.

This inspection was conducted 12/06/2022 to 12/09/2022.

Additional Inspectors:

JESSICA GOWINS, VETERINARY MEDICAL OFFICER

Prepared By: GLORIA MCFADDEN
USDA, APHIS, Animal Care
Title: VETERINARY MEDICAL OFFICER

Date:
15-DEC-2022

Received by Title: Attending Veterinarian

Date:
15-DEC-2022



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
81	51-R-0006	003	JOHNS HOPKINS UNIVERSITY, THE	06-DEC-2022

Count	Scientific Name	Common Name
000060	<i>Mesocricetus auratus</i>	SYRIAN / GOLDEN HAMSTER (COMMON PET/RESEARCH TYPE)
000009	<i>Canis lupus familiaris</i>	DOG ADULT
000041	<i>Cavia porcellus</i>	DOMESTIC GUINEA PIG
000214	<i>Callithrix jacchus</i>	COMMON MARMOSET
000089	<i>Macaca mulatta</i>	RHESUS MACAQUE
000011	<i>Macaca nemestrina</i>	PIG-TAILED MACAQUE
000085	<i>Sus scrofa domestica</i>	DOMESTIC PIG / POTBELLY PIG / MICRO PIG
000135	<i>Oryctolagus cuniculus</i>	DOMESTIC RABBIT / EUROPEAN RABBIT
000034	<i>Rousettus aegyptiacus</i>	EGYPTIAN FRUIT BAT
000085	<i>Eptesicus fuscus</i>	BIG BROWN BAT
000025	<i>Chinchilla lanigera</i>	CHINCHILLA (DOMESTICATED)
000025	<i>Mustela putorius furo</i>	DOMESTIC FERRET
000002	<i>Felis silvestris catus</i>	CAT ADULT
000033	<i>Cricetulus griseus</i>	CHINESE HAMSTER
000067	<i>Carollia perspicillata</i>	SEBA'S SHORT-TAILED BAT
000034	<i>Papio anubis</i>	OLIVE BABOON
000007	<i>Ovis aries aries</i>	SHEEP INCLUDING ALL DOMESTIC BREEDS
000003	<i>Papio hamadryas</i>	HAMADRYAS BABOON
000959	Total	