

July 12, 2021

Patricia A. Brown, VMD, MS  
Director  
Office of Laboratory Animal Welfare (OLAW)  
National Institutes of Health  
6700B Rockledge Dr., Suite 2500, MSC 6910  
Bethesda, Maryland 20892  
Via email: brownp@od.nih.gov; olaw@mail.nih.gov

Dear Director Brown:

On behalf of Rise for Animals (Rise), I am writing to relay our concern regarding troubling evidence of animal suffering at the Wisconsin National Primate Research Center (WNPRC) at the University of Wisconsin-Madison (UW-Madison), PHS Assurance #D16-00239 (A3368-01), of which you should be aware.

### **Document We Reviewed**

In formulating the recommendation below, Rise reviewed the College of Letters and Science and Vice Chancellor for Research and Graduate Education Center's (LSVC) Animal Care and Use Committee (ACUC) [meeting minutes](#) for February 21, 2020, obtained through a Wisconsin Open Records Act request.

### **Finding: A Baby Monkey Was Inappropriately Used in a Procedure**

The document we reviewed reveals that on January 21, 2020, an infant rhesus macaque, assigned to protocol G006108, underwent an ocular exam, blood collection, and MRI scan associated with protocol G006108.

Two days later, on January 23, 2020, the same infant underwent sedation, an ocular exam, blood collection, intubation, and relocation to an MRI suite "before it was discovered that it was the incorrect animal." According to the minutes, the WNPRC personnel responsible for the mistake were retrained on animal identification procedures.

Then, on February 5, 2020, "the same infant was sedated for a routine physical exam, TB testing, and blood collection for major histocompatibility complex (MHC) typing," associated with protocol G006108.

Thus, due to these three instances, blood collection exceeded the 20% allowable volume within 30 days. The WNPRC staff responsible for exceeding the maximum volume were to be trained on the procedure for blood collection. Protocol G006108 was not PHS-funded, and the ACUC accepted the report.

**Request: OLAW Investigate the Situation**

In reviewing this record, Rise was disappointed to see that OLAW was not made aware of these two failures to follow procedure at the WNPRC resulting in a baby monkey undergoing three procedures, as opposed to two, and having more than the maximum volume of blood collected within 30 days. Lab personnel failed to follow the animal identification standard operating procedure on January 23, 2020, resulting in several unauthorized medical procedures being performed. Then they failed to adhere to blood collection procedure on February 5, 2020, resulting in more than 20% of the infant's blood being drawn within a mere fifteen days. Rise wants to ensure that OLAW knows of this serious situation.

Further, we respectfully request that OLAW look into this failure at the WNPRC. While Protocol G006108 was not PHS-funded, the WNPRC is and as such, Rise requests that OLAW investigate this situation to ensure it does not occur again.

Thank you for your consideration of this request, and for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'F. Chrzan', with a long horizontal stroke extending to the right.

Frances Chrzan, J.D.  
Legislative & Public Policy Associate  
Rise for Animals