



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare  
6700B Rockledge Drive, Suite 2500, MSC 6910  
Bethesda, Maryland 20892-6910  
Home Page: <http://grants.nih.gov/grants/olaw/olaw.htm>

FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare  
6700B Rockledge Drive, Suite 2500  
Bethesda, Maryland 20817  
Telephone: (301) 496-7163  
Facsimile: (301) 402-7065

April 12, 2019

Re: Animal Welfare Assurance  
A3944-01 [OLAW Case 10]

Dr. Sandra Harris-Hooker  
Vice President and Executive Vice Dean  
For Research and Academic Administration  
Morehouse School of Medicine –  
Atlanta University Center  
720 Westview Drive - SW  
Atlanta, GA 30310

Dear Dr. Harris-Hooker,

The Office of Laboratory Animal Welfare (OLAW) has received your February 26, 2019 letter responding to our request for information regarding allegations by the People for the Ethical Treatment of Animals (PETA) against Morehouse School of Medicine. It is understood that you have completed an internal investigation into the specific allegation that in June 2018 hamsters were used in a social defeat model session and that two hamsters died of injuries incurred during that session, despite veterinary care. Your investigation determined that the procedure was not conducted as described in the IACUC-approved protocol and study notes were not adequately documented during the experiment. This activity was not supported by the PHS or the NSF.

Corrective actions included halting the experiment until a protocol amendment was approved and retraining of laboratory staff was completed and documented. A copy of the protocol is to be available in a designated folder in the laboratory and all personnel must be documented as aware of the approved procedures.

OLAW appreciates the consideration of these matters by Morehouse School of Medicine. We especially want to recognize your part in providing transparency between your Office and OLAW. We appreciate your actions as Institutional Official regarding this matter in particular and find no cause for further action by this office.

Sincerely,

(b) (6)

Brent C. Morse, DVM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare

cc: IACUC contact

Dr. Robert M. Gibbens, USDA, APHIS, AC



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April 12, 2019

Dr. Alka Chandna  
Vice President, Laboratory Investigations Cases  
Laboratory Investigations Department  
People for the Ethical Treatment of Animals  
1536 16<sup>th</sup> Street, NW  
Washington, DC 20036

Dear Dr. Chandna:

The Office of Laboratory Animal Welfare (OLAW) has completed its investigation regarding allegations by People for the Ethical Treatment of Animals (PETA) concerning Morehouse School of Medicine as contained in your January 30, 2019 document to our Office. Background information was reviewed and interviews conducted. The results of the investigation included a review of the protocol noncompliance regarding the social defeat stress procedure and the resultant deaths of two hamsters in June 2018. OLAW has determined that, although this activity was not PHS-supported, the IACUC has implemented greater oversight of the protocol and has required retraining of all laboratory staff regarding the amended protocol, the social defeat procedure, study documentation, animal health surveillance and notification of the Primary Investigator and Center for Laboratory Animal Resources (CLAR) staff of unforeseen incidences. These animal activities were not funded by the PHS or the NSF, but the institution cooperated fully with our Office.

OLAW shares your concern for the welfare of laboratory animals. We find no cause for further action by this office at this time.

Sincerely,

(b) (6)

Brent C. Morse, DVM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare



Office of the Executive Vice Dean

February 26, 2019

Brent C. Morse, DVM, DACLAM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
6700B Rockledge Drive, Suite 2500, MSC 6910  
Bethesda, MD 20892

Dear Dr. Morse:

The Morehouse School of Medicine/Atlanta University Center (MSM/AUC) IACUC, in accordance with Assurance A3944-01 and PHS Policy IV.F3., provides this report of non-compliance in reporting to the USDA an incident that resulted in injury and death of two Syrian hamsters. The social defeat stress procedure performed with hamsters was reviewed and approved by the MSM/AUC IACUC in 2016. The incident that occurred in June 2018, was first reported to Susanne Brunkhorst, DVM, USDA, on December 12, 2018 during our routine inspection.

On June 21, 2018, the Center for Laboratory Animal Resources (CLAR) was notified that a social defeat stress protocol in Syrian hamsters caused injuries to two hamsters. Despite veterinary care, the hamsters died as a result of their injuries. A thorough investigation by CLAR found that the social defeat stress procedure conducted by an AUC student was not performed as described in their IACUC approved protocol and that study notes were not adequately documented during the experiment. The IACUC discussed the incident and requested corrective actions from the investigator responsible for the study.

All notes related to the incident and to the care administered to the hamsters were documented and placed in the investigator's IACUC file which is available for review by all federal regulatory inspectors/agencies. To address the situation and prevent its reoccurrence, corrective actions were taken including the submission of a *Social Defeat Plan* amendment.

The following corrective action plan was implemented after the incident:

1. The PI submitted an amended protocol to CLAR on June 25, 2018 that includes:
  - a. re-training of laboratory staff on proper SOP for social defeat procedure, specifically:
    - i. social defeat procedure as described in approved protocol
    - ii. study documentation (in laboratory notebook and back of cage cards)
    - iii. animal health surveillance to identify possible injuries
    - iv. dedicated area with extra lighting for assessing overall animal health
    - v. procedure for notifying study PI and CLAR staff of unforeseen incidences
  - b. availability of IACUC approved research protocol in designated folder in the laboratory and documentation that all personnel were aware of IACUC approved procedures
  - c. documentation to CLAR of re-training completion.

2. The PI was not allowed to perform the social defeat stress procedure until the amended protocol and re-training occurred.
3. The incident and amended protocol were discussed and the amendments were approved by the IACUC at the July 19, 2018 meeting.

At the July 19, 2018 meeting the IACUC also determined that the incident was an isolated event. Because it was not an ongoing issue in a laboratory which previously had an incident-free animal research history, IACUC decided a formal report would be made to USDA only if there was a recurrence. The IACUC minutes do not reflect the detailed discussion that was held regarding this matter and the reporting error was not caught on the review of the minutes by IACUC members.

IACUC confirmed through discussions with the investigator that the study was not funded by NIH or NSF and only from institutional resources.

In closing, since its inception over thirty years ago, the MSM/AUC IACUC has provided judicious oversight in the responsible use of vertebrate animals in scientific research. MSM/AUC IACUC is dedicated to proper animal welfare and remain committed to transparent practices to ensure that all federal and institutional regulations are properly adhered to by researchers. Any incident that results in death or non-compliance of USDA regulatory animals will be discussed with USDA staff and reported as necessary to the proper federal agency based on USDA's recommendation. This event and response will also be discussed at our next IACUC meeting.

Sincerely,

(b) (6)

Sandra Harris-Hooker, Ph.D.  
Vice President and Executive Vice Dean  
for Research and Academic Administration  
Professor, Department of Pathology

**Morse, Brent (NIH/OD) [E]**

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**From:** Morse, Brent (NIH/OD) [E]  
**Sent:** Wednesday, February 27, 2019 9:45 AM  
**To:** 'Harris-Hooker, Sandra'  
**Cc:** Francis, Sharon  
**Subject:** RE: Noncompliance Letter

Thank you Dr. Harris-Hooker. I knew you'd send a follow-up. We will send an official response soon.

Best regards, Brent Morse

Brent C. Morse, DVM, DACLAM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health

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**From:** Harris-Hooker, Sandra [mailto:sharris-hooker@msm.edu]  
**Sent:** Wednesday, February 27, 2019 9:37 AM  
**To:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>  
**Cc:** Francis, Sharon <sfrancis@msm.edu>  
**Subject:** FW: Noncompliance Letter

Good Morning Dr. Morse,

I sent you an email on last evening (see email below) and did not attach the letter as intended. My apology, the letter is now attached.

Have a great day,

Sandra

Sandra Harris-Hooker, Ph.D.  
Professor, Department of Pathology and Anatomy  
Vice President and Executive Vice Dean  
for Research and Academic Administration  
Morehouse School of Medicine  
(b) (6)

---

**From:** Harris-Hooker, Sandra  
**Sent:** Wednesday, February 27, 2019 12:35 AM  
**To:** Morse, Brent (NIH/OD) [E]  
**Cc:** Francis, Sharon  
**Subject:** Noncompliance Letter

Dear Dr. Morse,

As Morehouse School of Medicine's Institutional Signing Official, I am providing a letter summarizing the incident related to the USDA non-reporting issue. Please let us know if additional information is needed.

Sincerely,

Sandra

Sandra Harris-Hooker, Ph.D.  
Professor, Department of Pathology  
Vice President and Executive Vice Dean  
for Research and Academic Administration

(b) (6)

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**Morse, Brent (NIH/OD) [E]**

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**From:** Morse, Brent (NIH/OD) [E]  
**Sent:** Wednesday, February 06, 2019 1:31 PM  
**To:** (b) (6)  
**Subject:** Request for information from OLAW/NIH  
  
**Importance:** High

Hello (b) (6)

I am requesting an opportunity to talk with you in your role as IACUC Chair. A complaint against MSM has been lodged with our office by PETA regarding the use and subsequent deaths of two hamsters in June 2018. Please let me know when you are available for a 5-10 minute phone conversation. I am available tomorrow (Thursday) but not Friday. Thank you for your consideration.

Best regards, Brent Morse

Brent C. Morse, DVM, DACLAM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health

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2/7/19 spoke w/ (b) (6) prior Chair.  
- 2 hamsters were of 2 separate pairs.  
- Several cages were being paired at same time.  
→ Sharon Francis, PhD current Chair  
They will send a report.





January 30, 2019

Brent Morse, DVM  
Acting Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health  
6700B Rockledge Drive  
Bethesda, Maryland 20817

Via e-mail: [brent.morse@nih.gov](mailto:brent.morse@nih.gov)

Dear Dr. Morse,

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 6.5 million members and supporters to request that your office investigate possible noncompliance with 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*) related to the use and treatment of hamsters at Morehouse School of Medicine (Morehouse; PHS Assurance # D16-00537) in Atlanta, Georgia.

On December 12, 2018, the U.S. Department of Agriculture (USDA) issued an inspection report to Morehouse, documenting egregious violations of the federal Animal Welfare Act. It appears that several of the issues raised in the USDA's report—including failure to adhere to the animal use protocol approved by the Institutional Animal Care and Use Committee (IACUC), failure to provide adequate veterinary care to animals, failure to maintain records, and failure to ensure adequate training and instruction to personnel—may also indicate noncompliance with PHS Policy and the *Guide*.

The USDA's report describes an incident in which “[t]wo hamsters were severely injured during a social defeat model session conducted by a student researcher on/about 6/21/18.” As you know, the “social defeat model” involves using social conflict between members of the same species to deliberately generate emotional and psychological stress. A male animal is introduced into the home cage of a dominant, aggressive male—and the “intruder” is quickly attacked and forced into subordination. The defeated male emits frequent calls of distress, assumes a submissive posture, and exhibits freezing behavior.

According to the USDA's report, at Morehouse, the student experimenter “left the hamsters in the same cage for the full five minutes of the defeat session” and failed to separate them “based on the aggressive actions exhibited by the hamsters”—as had been specified in, and was required by, the IACUC-approved protocol. Moreover, the USDA's report documents that the student failed to keep “adequate procedural records and was not adequately trained in identifying and reporting hamster health issues.”

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

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323-644-PETA

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- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Sweden

Obtained by Rise for Animals.



As a result of these failures, both hamsters died. The first hamster (identified as 18-12) died in his cage and was discovered by veterinary staff the same day that the experiment took place. The second hamster was “found by veterinary staff to have multiple fight wounds on [his] back, neck and haunches and was noted to be extremely lethargic and grinding his teeth” on June 22, 2018 (the day after the experiment took place). Although this hamster was treated by veterinary staff, he was found dead in his cage the following day, on June 23, 2018.

As detailed below, we believe the lapses described in the USDA’s report reflect serious noncompliance with PHS Policy and the *Guide*.

## **I. The Institutional Animal Care and Use Committee**

The *Guide* states that the IACUC is “responsible for assessment and oversight of the institution’s Program components and facilities” and includes “ongoing assessment of animal care and use.” Moreover, it is the responsibility of the IACUC to review any proposed use of animals, with consideration to the potential of protocols “to cause pain or distress” to animals.

However, in failing to separate the hamsters in a timely manner, the student experimenter deviated from the protocol approved by the IACUC. As a consequence, the hamsters experienced increased pain and distress; and the deviation likely also contributed to the animals’ deaths. Given that the student experimenter was likely listed in the protocol as one of the individuals who would be involved in carrying out the “social defeat” study, the Principal Investigator, members of his/her staff, veterinary staff, animal care staff, and/or members of the IACUC should have been present to provide the “ongoing assessment of animal care and use” required by the *Guide*.

## **II. Provision of Adequate Veterinary Care, Recordkeeping, and Training of Personnel**

The *Guide* states that facilities must maintain an “adequate veterinary care program,” including “effective management” of “pain and distress.” On the latter point, the *Guide* directs that “animals should be observed for signs of illness, injury, or abnormal behavior” and procedures for diagnosis and therapy “should be those currently accepted in veterinary and laboratory animal practice.” The *Guide* further advises that: “[m]edical records are a key element of the veterinary care program and are considered critical for documenting animal well-being as well as tracking animal care and use at a facility.” Lastly, the *Guide* specifies that all “personnel involved with the care and use of animals must be adequately educated, trained, and/or qualified ... to help ensure ... animal well-being.”

However, according to the USDA’s report, it appears that the student was “not adequately trained in identifying and reporting hamster health issues.” As a result, the student failed to separate the hamsters in a timely fashion; failed to report that the hamster identified as 18-12 required veterinary care in a timely fashion; failed to document the extensive fight wounds suffered by the second hamster; and failed to maintain adequate procedural records. It was determined that the student had been inadequately trained before they were permitted to carry out an experiment that caused imaginable physical and psychological suffering to the hamsters.

We urge your office to treat this matter with gravity and respond swiftly to investigate and take appropriate disciplinary action. If you determine that the incidents described in the USDA’s

report comprise noncompliance with PHS Policy and the *Guide*, we ask that you demand repayment of any federal monies that may have been used in the conduct of the problematic activities.

Thank you for your consideration of our concerns. I look forward to receiving your response.

Sincerely,

(b) (6)

Alka Chandna, Ph.D.  
Vice President  
Laboratory Investigations Cases  
Laboratory Investigations Department  
People for the Ethical Treatment of Animals  
1536 16<sup>th</sup> Street NW, Washington, DC 20036  
[AlkaC@peta.org](mailto:AlkaC@peta.org) | (b) (6)

## **Morse, Brent (NIH/OD) [E]**

---

**From:** Dr. Alka Chandna <AlkaC@peta.org>  
**Sent:** Thursday, January 31, 2019 8:41 AM  
**To:** Morse, Brent (NIH/OD) [E]  
**Subject:** RE: Concerns from PETA re treatment of animals at Morehouse School of Medicine

Good morning, Dr. Morse,

Thank you very much for your kind acknowledgement and thank you in advance for your work to look into our concerns.

With kindest regards,

Alka Chandna

---

**From:** Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov>  
**Sent:** Thursday, January 31, 2019 8:35 AM  
**To:** Dr. Alka Chandna <AlkaC@peta.org>  
**Subject:** RE: Concerns from PETA re treatment of animals at Morehouse School of Medicine

Dear Dr. Chandna,

This is to acknowledge receipt of your letter concerning Morehouse School of Medicine in Atlanta, Georgia. At this time your concerns are under review.

Best regards, Brent Morse

Brent C. Morse, DVM, DACLAM  
Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare  
National Institutes of Health

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**From:** Dr. Alka Chandna [<mailto:AlkaC@peta.org>]  
**Sent:** Wednesday, January 30, 2019 2:03 PM  
**To:** Morse, Brent (NIH/OD) [E] <[morseb@mail.nih.gov](mailto:morseb@mail.nih.gov)>  
**Subject:** Concerns from PETA re treatment of animals at Morehouse School of Medicine

Dear Dr. Morse,

I hope this correspondence finds you well. Please find attached a letter from PETA, summarizing our concerns regarding an incident involving hamsters at Morehouse School of Medicine in Atlanta, Georgia. We believe the treatment of animals described in our letter may indicate noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals and the Guide for the Care and Use of Laboratory Animals. We respectfully request that you investigate this matter and take appropriate disciplinary action.

Thank you for your time and consideration.

Sincerely,

Alka Chandna

Alka Chandna, Ph.D.  
Vice President, Laboratory Investigations Cases  
Laboratory Investigations Department  
People for the Ethical Treatment of Animals  
1536 16<sup>th</sup> Street NW, Washington, DC 20036

The more we learn of the true nature of non-human animals, especially those with complex brains and corresponding complex social behavior, the more ethical concerns are raised regarding their use in the service of man -- whether this be in entertainment, as "pets," for food, in research laboratories, or any of the other uses to which we subject them. -- Dr. Jane Goodall



## Inspection Report

Morehouse School Of Medicine  
720 Westview Drive Sw  
Atlanta, GA 30310

Customer ID: **883**

Certificate: **57-R-0124**

Site: 001

MOREHOUSE SCHOOL OF MEDICINE

Type: ROUTINE INSPECTION

Date: 12-DEC-2018

### 2.32(a) CRITICAL

#### PERSONNEL QUALIFICATIONS.

Two hamsters were severely injured during a social defeat model session conducted by a student researcher on/about 6/21/18. One of the hamsters (18-12) was reported as not looking good on 6/21/18 via an email from the student and was found deceased 10 minutes later by veterinary staff. The second hamster was found by veterinary staff to have multiple fight wounds on its back, neck and haunches and was noted to be extremely lethargic and grinding its teeth on 6/22/18. It was treated by veterinary staff on 6/22/18 and was found deceased on 6/23/18. Review by facility and IACUC members included interviews with the student and the principal investigator. It was determined that the student researcher was insufficiently trained. The student left the hamsters in the same cage for the full five minutes of the defeat session as described in the protocol and did not separate them sooner based on the aggressive actions exhibited by the hamsters as delineated in the protocol. In addition the student was not keeping adequate procedural records and was not adequately trained in identifying and reporting hamster health issues to include wounding. A retraining action plan was implemented by the PI for all lab student researchers. The IACUC July 19, 2018 minutes state that the incidence was reported to the USDA but further investigation determined that the statement was an error-the IACUC chair communicated that no report was made. Since the retraining was conducted, no further hamster wounding issues have been reported. Continue to ensure that all researchers using animals on this protocol are trained in the proper handling and proper post-procedural care of the hamsters.

This inspection and exit interview were conducted with undersigned Director of Operations.

Prepared By:

BRUNKHORST SUSANNE, D V M

BRUNKHORST SUSANNE, D V M USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER 1076

Received By:

Date:

12-DEC-2018



## Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
883	57-R-0124	001	MOREHOUSE SCHOOL OF MEDICINE	12-DEC-18

Count	Scientific Name	Common Name
000009	<i>Mesocricetus auratus</i>	SYRIAN / GOLDEN HAMSTER (COMMON PET/RESEARCH TYPE)
000009	<b>Total</b>	