



Animal and Plant  
Health Inspection  
Service

June 15, 2022

4700 River Road  
Riverdale, MD 20737

EVMS Office of Research  
735 Fairfax Avenue  
Waitzer Hall, Suite 1112  
Norfolk, Virginia 23507

Dear Dr. [REDACTED]

I reviewed your letter dated December 20, 2021, and subsequent letters with additional information dated January 31, 2022, and February 4, 2022, related to your request for an exception to the regulatory requirement under 9 C.F.R. § 2.31(d)(1)(x), that limits an animal to one major operative procedure. You are making this request in order to continue the work performed under protocol #21-003 (approved 05/06/2021 and expires 05/06/2024), which will entail up to 6 caesarian sections on 5 adult female baboons (*Papio anubis*).

The subject animals are identified as numbers: 26741 (date of birth 6/1/2005), 26876 (date of birth 6/29/2005), 27320 (date of birth 10/24/2005), 07105 (date of birth 10/5/2005), and 03105 (date of birth 4/11/2005). Five of the 6 animals have already undergone at least 1 prior c-section, under protocols #15-009 (expired), #18-006 (expired) and #21-003 (current protocol). The subject animals are part of a single developmental study examining the role of estrogen (estradiol) on placental-fetal development and offspring function. (Further details of the methodology and rationale were provided in your communications noted above.)

After thorough review and consideration, the exception is **approved from June 15, 2022, to May 6, 2024**, with the following provisions that EVMS must ensure:

1. All work is performed in accordance with protocol #21-003.
2. This exception applies *only* to animals 26741, 26876, 27320, 07105 and 03105.
3. No more than 6 research-related major operative procedures are performed per animal per lifetime.
4. No animal undergoes a major operative procedure under this exception after May 6, 2024, without written approval from this office.
5. Adequate recordkeeping is maintained regarding the number of surgeries performed.
6. The IACUC evaluates animal well-being along with the effectiveness and soundness of methods and procedures, a minimum of every six months during the approval period.

Any failure to abide by the above provisions will result in the automatic withdraw of APHIS' approval of this exception. This approval is in accordance with 9 C.F.R. § 2.31(d)(1)(x)(C). If there are any questions, please contact your inspector, the Fort Collins office at (970) 494-7478, or send inquiries to [animalcare@usda.gov](mailto:animalcare@usda.gov). Thank you.

Sincerely,

ELIZABETH  
GOLDENTYER

Digitally signed by ELIZABETH  
GOLDENTYER  
Date: 2022.06.15 13:42:45 -04'00'

Betty Goldentyer, DVM  
Deputy Administrator

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