



Animal Welfare Institute

900 PENNSYLVANIA AVENUE, SE, WASHINGTON, DC 20003 · 202-337-2332 · AWIONLINE.ORG

April 14, 2023

Dr. Linda A. Livingstone

President of Baylor University

Dr. Kevin Chambliss

Institutional Official of Baylor IACUC & Vice Provost of Research

Dr. N. Bradley Keele

IACUC Chair & Psychology and Neuroscience Department Chair

Dr. Ryan Stoffel

Director of Animal Facility & Attending Veterinarian

Dear President Livingstone, and Drs. Chambliss, Keele, and Stoffel:

We received your response to our concerns in an email dated February 27, 2023. While we appreciate that some actions have been taken by the Institutional Animal Care and Use Committee (IACUC) and the department, your response is vague and leaves many unanswered questions.

You stated that “the IACUC performed a complete *de novo* review of all protocols involving live rats used for teaching.” What was the outcome of this review? Specifically:

- Will Baylor continue to approve the use of live rats for its Learning & Behavior Lab (NSC/PSY3120), even though a valid non-animal alternative exists?
- Will any rats used in NSC/PSY3120 be singly housed and subjected to invasive procedures, such as prolonged water deprivation, even though such treatment is not warranted in light of current scientific understanding of rat behavior and welfare?
- What other undergraduate courses use live rats for teaching?

Additionally, you stated that “the department revised and corrected the laboratory manual in use in the course to reflect more accurately the policies and procedures of Baylor and the actions and requirements of the IACUC.”

- In the spirit of institutional transparency, can you share the revised laboratory manual with us?

- Was the IACUC aware of concerns that the manual was misleading students into believing that these rats were not going to be killed after course completion?

You also stated that you have “re-enacted a formal adoption program as one of several alternatives to euthanasia for any protocol endpoint.” We are pleased to hear that; however, your use of the word “re-enacted” suggests Baylor once had an adoption program that it had stopped implementing.

- Can you elaborate on why the former program was not successful and what corrective measures you have taken to ensure the new program will not suffer the same fate?
- Can you share with us the details of your adoption program? Will students be informed at the beginning of the course that the program exists?
- Was adoption ever an option for NSC/PSY3120 or any other educational course?
- Is killing the rats at the end of the course still an option after the *de novo* review?

Reviewing your teaching protocols and revising the lab manual are steps in the right direction, but failure to have done so until being prompted raises fundamental questions about oversight and institutional culture at Baylor. Failing to keep such basics as course manuals accurate and up-to-date undercuts your letter’s claim of an “established compliance framework to effect the requirements of an animal welfare program,” since NIH’s Office of Laboratory Animal Welfare (OLAW) relies on enforced self-regulation through the IACUC. Moreover, continued education and regular updates are mandated by the *Guide for the Care and Use of Laboratory Animals*, which states that “Continuing education programs should be offered to reinforce training and provide updates that reflect changes in technology, legislation, and other relevant areas.” (p. 18) As you know, the *Public Health Service Policy on the Humane Care and Use of Laboratory Animals* “requires that Assured institutions base their programs of animal care and use on the Guide....” (p. 9)

Our concerns about institutional culture, including attitudes of personnel, are exacerbated by statements made by Baylor staff in interviews with the *Baylor Lariat* at the time the issues discussed in this letter were ongoing¹. In September 2022, Dr. Ryan Stoffel, attending veterinarian, animal program director, and IACUC member, told the *Baylor Lariat*, “I want to make sure that the animals that we use in research are well cared for and that we take into account their welfare” and that Baylor’s IACUC makes sure animals “are used appropriately.” Does the Baylor IACUC consider social isolation, prolonged water deprivation, and needless killing of rats for the purposes of an undergraduate psychology course to be examples of animals “used appropriately” and “tak[ing] into account their welfare”? We find Dr. Stoffel’s statement particularly troublesome given that, during his tenure as Senior Program Veterinarian at the University of Wisconsin-Madison from July 2011 to August 2016, the university received multiple USDA citations for numerous monkey deaths and severe injuries caused by dehydration, escape attempts, mismanaged social groupings, and inadequate anesthesia. A ferret, a squirrel, and two mice also died. In 2020, UW-Madison paid a \$74,000

fine – to date, the largest levied against a research facility since 2017 – for many of these citations. Given this, we can only wonder what the USDA would find if Baylor housed species covered under the Animal Welfare Act (AWA) at its research facilities. We do know that the USDA documented a direct citation — the most severe type of “critical” citation — in June 2022, finding the Baylor mascots — two geriatric bears — suffering from the heat. This included Lady “panting heavily and constantly” in 96-degree heat in the middle of summer. This was about a year after Baylor publicly touted the “world-class” care allegedly provided to these bears.

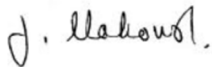
In the same recent article in the *Baylor Lariat*, Natashia Howard, office manager of the Baylor Sciences Building director’s office and a former laboratory animal assistant in the BSB Vivarium, said the research mice and rats get fed very well and are “living the plush life.” We are intrigued by Howard’s comment that rodents at Baylor are “living the plush life.” A good life for laboratory rodents is a key focus of our work and publications, so we are particularly interested to learn more about this.

We would appreciate receiving a response no later than April 21, 2023.

Sincerely,



Susan Millward
Executive Director



Joanna Makowska, PhD
Laboratory Animal Advisor

1. Wang, S. BSB Vivarium delves into research with animal welfare in mind. *Baylor Lariat*, 20 September 2022. Available at: <https://baylorlariat.com/2022/09/20/bsb-vivarium-delves-into-research-with-animal-welfare-in-mind/>.