From: Justin Goodman [mailto:JustinG@peta.org]
Sent: Friday, February 20, 2015 12:48 PM
To: Volkov, Marina (NIH/OD) [E]; Info Quality (NIH/OD); Info Quality (NIH/OD)
Cc: Wehr, Elizabeth (NIH/NICHD) [E]; Collins, Francis (NIH/OD) [E]; Tabak, Lawrence (NIH/OD) [E]; Hudson, Kathy (NIH/OD) [E]
Subject: Complaint regarding violations of HHS “Guidelines for Ensuring the Quality of Information Disseminated to the Public”
Importance: High

February 20, 2015

Marina Volkov, Ph.D.
Office of Science Policy
Office of the Director
National Institutes of Health
Building 1, Room 218
9000 Rockville Pike
Bethesda, MD 20892

Dear Dr. Volkov,

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 3 million members and supporters regarding likely violations of the Department of Health and Human Services (HHS) Office of Management and Budget (OMB) “Guidelines for Ensuring the Quality of Information Disseminated to the Public.” In recent media interviews, National Institutes of Health (NIH) staff speaking on behalf of the agency have grossly distorted details of, and made entirely false claims about, their controversial psychological experiments on infant monkeys in apparent attempts to discredit me, PETA and members of Congress, and mislead the public.

In a February 3, 2015 article published by online news website Vocativ, NIH staffer Stephen Suomi—who leads the experiments in question at the National Institute of Child Health and Human Development (NICHD)—was quoted as saying that videos of his experiments that PETA released were “all made up.” He made this claim despite being completely aware that the videos were obtained by PETA directly from the NIH via the Freedom of Information Act (I have attached that request). The approved protocols associated with these videos, obtained via an additional FOIA request submitted on August 8, 2013, as well as publications co-authored by Suomi that resulted from these videos (e.g. the Suarez-Jimenez article attached), indicate that all the monkeys in the videos are from Stephen Suomi’s laboratory.

Regarding a letter of concern that Members of Congress sent to NIH about his experiment, Suomi apparently told Vocativ: “the specific allegations in that [congressional] letter are bogus.” Yet, the brief summary of the experiments included in the letter is completely accurate and based on NIH’s own documents, including peer-reviewed research articles and the current NIH-approved protocol for the experiments (ASP 14-043; approved through April 2017). I have attached some of these documents with the key sections highlighted.

According to the Vocativ article, Suomi also “stressed that he has never performed painful, invasive procedures on his monkeys,” that “he does not breed monkeys to be predisposed to mental illnesses,” that “he never performs brain surgery or invasive procedures on the monkeys,” and “that he certainly does not kill or torture his monkeys.” Again, all of the claims are demonstrably false, and the reporter was able to debunk all of them with evidence provided by PETA from Suomi’s recent publications and his current NIH-approved animal use protocol. The Vocativ article highlighted some of this material, and you can find it attached as well.

The aforementioned situation was troubling, but the NIH’s dishonesty about this issue apparently did not end there.
On February 18, 2015, Washington Jewish Week published an article about the same controversial experiments, and again, an NIH official apparently deceived the reporter to deflect criticism about the project. According to the article, Constantine Stratakis, Scientific Director of the Division of Intramural Research at NICHD, told the reporter, “Rather than being housed in small cages, monkey subjects in this study live at NIH’s 500-acre Poolesville facility that sets aside 475 acres for field stations, pastures, open space and unmaintained woodland, Stratakis said. When the primates are caged, they are in room-size indoor-outdoor pens that always contain other monkeys, he said. If the animals were placed in tiny cages, behaviorally, they would be stressed and then the results of the NIH study would not be accurate, he said.” This could not be any further from the truth. The approved protocol for the study (ASP 14-043 attached)—and numerous publications from the laboratory—describes how many infants are removed from their mothers within 12 hours of birth, singly-housed in incubators, and then transferred to small single cages where they are confined alone for 22 hours a day on weekdays, with only two hours of contact with peers, and are confined alone for 24 hours on weekends (e.g. see last paragraph on page 5 of the protocol).

Stratakis was further quoted as downplaying the removal of infants from their mothers at birth by stating that it occurs “long before any kind of attachment bond can be formed in this species.” In reality, just like humans, primate infants have an innate need for the physical and emotional support of their mothers, which they are deprived of by Suomi. Indeed, one of the key conclusions that have come from Suomi’s experiments is that removing the babies from their mothers leaves psychological scars and negative biological impacts on the infants that last a lifetime.

Stratakis went on to claim that Suomi’s laboratory is “studying the long-term effects of being in foster care and whether any of the effects carry on to future generations.” Again, this is a gross obfuscation as is evidenced by the approved protocol, publication record and even Suomi’s online project summary and 2014 annual report. The primary purpose of the experiments is to assess the adverse biological and behavioral effects of maternal deprivation on monkeys.

Stratakis then stated that this kind of study “is impossible to do in a human population.” He continued: “How could you ever take a population of human kids” and remove them from their mothers? he asked. Also, he pointed out, “If you want to see the brain of a child who has spent time in foster care, what are you going to do, wait ’til the child dies?” Again, this is all misleading and factually untrue. Researchers around the world are doing sophisticated epigenetic studies using brain imaging and other modern techniques in humans who were orphans or experienced other early life adversity (eg. Hodel, A. S., et al. (2015). Duration of early adversity and structural brain development in post-institutionalized adolescents, *NeuroImage*, 105, 112-119.). Indeed, this type of human-based work has actually improved treatments for mental illness, unlike Suomi’s experiments on monkeys.

And, finally, it also appears that, in regard to an image used on PETA ad mentioned in the article, Stratakis told the reporter that “the monkey’s photo is from a study long since ended.” Again, this is simply not the case. The experiments in question from which the photo was taken are ongoing.

The aforementioned false statements made by NIH staff in the context of media interviews about official agency business clearly constitute oral information covered by the HHS/OMB Guidelines. The Guidelines state that such information disseminated by NIH in this context “should be objective in substance and presentation. Objectivity means ensuring that information is accurate, reliable, and unbiased and that information is presented in an accurate, clear, complete, and unbiased manner.” The demonstrably false statements covered in this letter certainly do not meet these standards.

Both Suomi and Stratakis are intimately familiar with the experiments in question. Thus, their patently untruthful statements about the nature of the work can only be explained as attempts to intentionally mislead the media and the public, and discredit PETA, scientists and the Members of Congress who have raised concerns about these disturbing studies. In the case of both media outlets mentioned above, it is clear from their articles that the credibility of PETA was questioned in light of the deceptive comments
made by NIH officials. This is potentially damaging to our reputation with these media outlets, as well as our relationships with other media outlets, our members and the general public.

We urge the Office of Science Policy to immediately review this case, and request that corrections be published on the news stories above, that a statement acknowledging the details of this breach of HHS policy be published on the agency’s website, and to demand that HHS employees cease and desist from making additional untruthful statements about this case.

Thank you for your time. I am available to discuss this matter in further detail in person or via telephone, and look forward to hearing from you.

Sincerely,

Justin Goodman, M.A.
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People for the Ethical Treatment of Animals
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