



*Taxpayers shouldn't be forced to pay \$20 billion+ for **wasteful** government animal experiments.*

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Deborah Kearse  
Director, Division of Program Integrity  
National Institutes of Health  
Office of Management Assessment  
6705 Rockledge Drive, RK1-RM 605-Q  
Bethesda, MD 20817

Via email: [Deborah.Kearse@nih.gov](mailto:Deborah.Kearse@nih.gov)

Dear Ms. Kearse,

On behalf of White Coat Waste Project (WCW) and its more than 3 million members and supporters, I am writing to request an investigation into widespread violations of federal spending transparency law by the University of Pennsylvania (UPenn) related to its National Institutes of Health (NIH)-funded experiments on dogs and cats.

### **VIOLATIONS OF FEDERAL SPENDING TRANSPARENCY LAW BY UPENN**

As you are aware, long-standing federal spending transparency law—known as the Stevens Amendment—requires that any press releases or statements describing taxpayer-funded projects under the Departments of Education, Labor and Health and Human Services (HHS) must include, “ (1) the percentage of the total costs of the program or project which will be financed with Federal money; (2) the dollar amount of Federal funds for the project or program; and (3) percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.”<sup>1</sup>

**As we detail below, UPenn’s releases about its cruel and wasteful NIH-funded experiments on dogs and cats violate this federal law.**

According to three press releases published in the last 5 years, UPenn has spent NIH funding to intentionally breed dogs and cats to suffer from debilitating genetic disorders for subsequent use in painful experiments when they are as young as two weeks old.<sup>2,3,4</sup> In another NIH-funded project, UPenn purchased healthy dogs from breeders and subjected them to experiments that depleted their white blood cells and caused the animals toxicity from injections of experimental compounds.<sup>5</sup>

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<sup>1</sup> Sec 505 of the Labor, Health and Human Services, and Education Appropriations Bill, 2021 (H. Rept. 116-450)

<sup>2</sup> *Progress toward a treatment for Krabbe disease*, Penn Today. 8/26/20

<sup>3</sup> *Getting gene therapy to the brain*, Penn Today. 7/28/20

<sup>4</sup> *Progress in addressing a severe skin disease that affects dogs and humans*, Penn Today. 7/5/18

<sup>5</sup> *Study shows promise for iNKT cell platform to treat cancer*. Penn Today. 10/19/23

A review of federal research databases shows that the NIH grants listed as funding sources on the published papers received over \$15 million in their most recent funding year alone.<sup>6</sup>

**The aforementioned press releases violate the Stevens Amendment by failing to report the specific amount of taxpayer funding UPenn spent on these cruel and wasteful experiments on dogs and cats, the percentage of total costs paid for by taxpayers and how much was funded by private sources.**

**Additionally, we determined that virtually all of UPenn’s press releases reporting NIH-funded animal experiments violate the Stevens Amendment.<sup>7</sup> The releases fail to acknowledge federal funding, and/or fail to report the amount of taxpayer money spent, and/or fail to report the percentage of the project paid for with taxpayer funds.**

### **SYSTEMIC SPENDING TRANSPARENCY FAILURES BY NIH GRANTEES**

The current example is troubling, but it is a symptom of a broader problem. A report coauthored by WCW found widespread violations of the Stevens Amendment by NIH grant-receiving institutions performing wasteful animal experiments.<sup>8,9</sup>

A Government Accountability Office (GAO) audit that followed the release of WCW’s report cited our troublesome findings and wrote that, “NIH officials stated that they do not specifically monitor for Stevens Amendment compliance.”<sup>10,11</sup>

The GAO recommended that HHS (including NIH) begin enforcing the law, and HHS stated that it “would direct all operating divisions to design a process for implementing and monitoring the Stevens Amendment and would update HHS grants policy to reflect this new process” and that it “would address any non-compliance issues if they were raised.”

Unfortunately, it appears NIH and its grantees continue to violate the law with impunity despite it being included in the NIH Grants Policy Statement under the heading “Acknowledgment of Federal Funding” and the NIH issuing notices specifically reminding grantees of this transparency mandate.<sup>12,13</sup>

To stem this rampant noncompliance with the Stevens Amendment and improve transparency about federal spending, Senator Joni Ernst (R-IA) and Congressman Ralph Norman (R-SC) have introduced the Cost Openness and Spending Transparency (COST) Act to improve adherence to this commonsense, good government measure and extend it to cover all recipients of federal funds.<sup>14</sup>

### **REQUEST FOR ACTION**

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<sup>6</sup> NIH grants [U24CA224122](#), \$567,985 in 2021; [U01CA272270](#), \$575,647 in 2023; [K08CA252619](#), \$153,651 in 2023; [P40OD010939](#), \$723,843 in 2023; [R01AR061106](#), \$333,887 in 2022; [R01AR068392](#), \$545,499 in 2023; [R01DK063973](#), \$739,053 in 2023; [UL1TR001878](#), \$10,247,682 in 2023; [T32NS007180](#), \$188,770 in 2018; [R01NS096087](#), \$392,877 in 2020; [F32NS093898](#), \$35,334 in 2018; [R00HD096115](#), \$244,020 in 2022; [R01NS065808](#), \$349,781 in 2018.

<sup>7</sup> [Penn Today](#), accessed 11/28/23

<sup>8</sup> [New report: Ivy League flunks on animal testing transparency](#), WCW Blog, 4/25/2017

<sup>9</sup> [Up In Smoke: WCW Report Exposes Wasteful Cannabis And 'Vape' Animal Experiments](#), WCW Blog, 4/20/2022

<sup>10</sup> [Feds confirm WCW report on animal testing transparency violations, propose reforms](#), WCW Blog, 3/14/2019

<sup>11</sup> [Agency action required to ensure grantees identify federal contribution amounts](#), Government Accountability Office, 3/14/2019

<sup>12</sup> [NIH grants policy statement \(Sec. 4.2.1\), Acknowledgement of federal funding](#).

<sup>13</sup> NIH: Notice of legislative mandates in effect for FY 2023, 2/3/2023

<sup>14</sup> [Wasteful Animal Tests Prompt COST Act Re-Introduction](#), WCW Blog, 3/14/23

For over 30 years since the Stevens Amendment was first passed, recipients of NIH funding have been legally required to clearly disclose the cost of their projects so taxpayers are aware of how their hard-earned money is being spent. Yet, evidence shows ongoing, widespread violations of this common-sense spending transparency law. The NIH has acknowledged this problem but abjectly failed to address it.

**We urge you to investigate UPenn's ongoing violations of federal law documented in this letter and debar their dog and cat experimenters from future NIH funding for their repeated failure to properly disclose how they spent taxpayer dollars.**

Thank you for your attention to this matter. Please do not hesitate to contact me with any questions at [DL@whitecoatwaste.org](mailto:DL@whitecoatwaste.org) or 202-643-8453.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Lopez", with a stylized flourish at the end.

Daniel Lopez  
Research and Investigations Director  
White Coat Waste Project

cc: Charles Haman, Director, OMA  
Wes Staley, Acting Assistant Director, OMA  
Dr. Michael Lauer, Deputy Director, NIH Office of Extramural Research  
NIH Hotline