



June 7, 2023

Deborah Kearse
Director, Division of Program Integrity
National Institutes of Health
Office of Management Assessment
6011 Executive Blvd., Suite 601, MSC 7669
Rockville, MD 20852

Via email: 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 report violations of federal law by the University of Iowa (UI) related to its cruel and wasteful dog experiments funded by the National Institutes of Health (NIH) and to request that the noncompliant project be defunded.

VIOLATIONS OF FEDERAL SPENDING TRANSPARENCY LAW BY THE UNIVERSITY OF IOWA

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.”¹

As we detail below, several UI press releases and statements about the school’s widely-opposed and wasteful NIH-funded dog experiments violate this federal law.

Earlier this year, White Coat Waste Project exposed how UI experimenters wasted taxpayer dollars to round up dogs discarded by their owners, lock them in mesh cages, strap capsules full of hungry sand flies to the dogs’ ears so the insects can “feed” on them in painful tests and then kill the dogs.²

¹ Sec 505 of the Labor, Health and Human Services, and Education Appropriations Bill, 2023

² [You Paid For It: Reports Show NIH Inflicted Pain On Discarded Dogs](#). WCW Blog. 3/6/23

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A review of federal research databases shows that the NIH grants listed as funding sources on these dog experiments have received almost \$10 million in taxpayer money to date.^{3,4}

Two articles posted on UI's website specifically discuss these NIH-funded dog experiments and violate federal law by failing to report the amount of taxpayer money spent and the percentages of the project paid for with taxpayer and private funds.^{5,6}

Additionally, we determined that virtually all of this UI lab's articles and releases reporting taxpayer-funded animal experiments violate the Stevens Amendment.⁷

SYSTEMIC SPENDING TRANSPARENCY FAILURES BY NIH GRANTEES

The current example is troubling, but it is a symptom of a broader problem. Reports authored by WCW found widespread violations of the Stevens Amendment by NIH grant-receiving institutions performing wasteful animal experiments.^{8,9}

A Government Accountability Office (GAO) audit that followed WCW's investigations cited our troublesome findings and wrote that, "NIH officials stated that they do not specifically monitor for Stevens Amendment compliance."^{10,11}

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.^{12,13}

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.¹⁴

REQUEST FOR ACTION

For over 30 years since the Stevens Amendment was first passed, recipients of NIH funding like the University of Iowa have been legally required to clearly disclose the cost of their projects so taxpayers are aware of how

³ Scorza, Breanna M et al. "[Leishmania infantum xenodiagnosis from vertically infected dogs reveals significant skin tropism.](#)" PLoS neglected tropical diseases vol. 15,10 e0009366. 6 Oct. 2021, doi:10.1371/journal.pntd.0009366

⁴ NIH grant [R01TW010500](#): \$2.4M since 2016; NIH grant [T32AI007260](#): \$7.5M since at least 1986. NIH RePORTER. Accessed 6/5/23

⁵ [Leishmania infantum xenodiagnosis from vertically infected dogs reveals significant skin tropism.](#) Dr. Christine Petersen Laboratory site. Accessed 6/5/23

⁶ About Leishmaniasis Research in Dogs. Dr. Christine Petersen laboratory site. Accessed 6/5/23

⁷ [Dr. Christine Petersen Laboratory.](#) University of Iowa site. Accessed 6/5/23

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

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

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

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

¹² [NIH grants policy statement \(Sec. 4.2.1\). Acknowledgement of federal funding.](#)

¹³ [NIH: Notice of legislative mandates in effect for FY 2023, 2/3/2023](#)

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

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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 the University of Iowa's ongoing violations of federal law documented in this letter and debar its dog experimenters for their repeated failure to properly disclose taxpayer funding.

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

Sincerely,



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

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