



December 6, 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 alert your office to violations of federal law by the University of Missouri (MU) related to their cruel and wasteful experiments on dogs funded by tax dollars via the National Institutes of Health (NIH).

VIOLATIONS OF FEDERAL SPENDING TRANSPARENCY LAW BY THE UNIVERSITY OF MISSOURI-COLUMBIA

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, a news article by MU’s *decoding science* blog describing its cruel and wasteful NIH-funded experiments on dogs violates this federal law.

An October 6, 2023, post titled “Ongoing vaccine projects address 100-year-old disease and others in fight against tick-borne diseases” describes the Principal Investigator’s NIH-funded work over the last 15 years, some of which involved mutating bacteria in ticks and letting them feed off healthy dogs before being killed, as well as vaccine experiments for other tick-borne diseases, in which -according to documents received a via open records request- some of the dogs would be assigned to *Maximum Pain* experiments, where the dogs will be allowed to develop the disease with no alleviation of their pain or discomfort.² An October 6, 2023 MU post titled “Ongoing vaccine projects address 100-year-old disease and others in fight against tick-borne diseases”

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

² Sarah Kiefer, “Ongoing vaccine projects address 100-year-old disease and others in fight against tick-borne diseases.” [decoding science](#). 10/7/23

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describes the Principal Investigator’s NIH-funded work over the last 15 years, some of which involved mutating bacteria in ticks and letting them feed on healthy dogs before killing the dogs. In other experiments for tick-borne diseases, MU documents obtained by WCW via an open records request show that some of the dogs would be assigned to USDA Column E “*maximum pain*” experiments, where the dogs will be allowed to develop diseases with no alleviation of their pain or discomfort.³ Some of these experiments were first discovered by WCW as part of its #BeagleGate investigative campaign in 2021 while the Principal Investigator worked at another institution.⁴

A review of federal research databases shows that the NIH grants listed as funding sources on the dog experiments described by MU above have received over \$11 million of taxpayers’ money.⁵

The aforementioned MU publication violates the Stevens Amendment by failing to report the amount of taxpayer funding spent on cruel and wasteful experiments on dogs, the percentage of total costs paid for by taxpayers, and how much -if any- was funded by private sources.

Additionally, we determined that virtually all of MU’s articles and releases reporting taxpayer-funded animal experiments violate the Stevens Amendment.⁶

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.^{7,8}

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.”^{9,10}

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.^{11,12}

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

³ Sarah Kiefer, “Ongoing vaccine projects address 100-year-old disease and others in fight against tick-borne diseases.” [decoding science](#). 10/7/23

⁴ BREAKING: WCW Exposes Fifth Fauci-funded Horror, Dogs Eaten By Hundreds Of Ticks, [WCW Blog](#), 10/29/21

⁵ NIH grants [R01AI152418](#), \$2,479,221 since 2020; [R01AI152417](#), \$2,235,101 since 2021; [R01AI070908](#), \$6,749,259 since 2008

⁶ [decoding science](#) site; [Show Me Mizzou](#) site. Accessed 11/6/23.

⁷ New report: Ivy League flunks on animal testing transparency. [WCW Blog](#), 4/25/2017

⁸ Up In Smoke: WCW Report Exposes Wasteful Cannabis And ‘Vape’ Animal Experiments. [WCW Blog](#), 4/20/2022

⁹ Feds confirm WCW report on animal testing transparency violations, propose reforms. [WCW Blog](#), 3/14/2019

¹⁰ Agency action required to ensure grantees identify federal contribution amounts. Government Accountability Office, 3/14/2019

¹¹ NIH grants policy statement (Sec. 4.2.1). [Acknowledgement of federal funding](#).

¹² NIH: Notice of legislative mandates in effect for FY 2023, 2/3/2023

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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.¹³

REQUEST FOR ACTION

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 MU's ongoing violations of federal law documented in this letter and debar their dog experimenters for their 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

¹³ [Wasteful Animal Tests Prompt COST Act Re-Introduction](#), WCW Blog, 3/14/23

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