

WHITE COAT WASTE PROJECT

February 12, 2025

Via email

Deborah Kearse
Director, Division of Program Integrity
National Institutes of Health
Office of Management Assessment
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 clear violations of federal law by the University of Pennsylvania (UPenn) related to their cruel and wasteful experiments on animals funded by tax dollars via the National Institutes of Health (NIH). We also request that these noncompliant animal experimenters be debarred from future taxpayer funding.

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 Department of Health and Human Services (HHS)—including NIH—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 UPenn news article about their cruel and wasteful NIH-funded experiments on animals violates this federal law.

A news article posted on the *PennVet News Room* site describes UPenn’s cruel experiments where dogs were purposefully bred with retinal degeneration diseases to then be used in various brain and eye imaging tests².

A search of federal research databases show that the grants acknowledged in the article have received \$66,518,882 of taxpayers’ money.³

Accordingly, UPenn indisputably violates federal law by failing to report the amount of taxpayer funding UPenn spent on cruel and wasteful experiments on animals, the percentage of total costs paid for by taxpayers, and how much—if any—was funded by private sources.

SYSTEMIC SPENDING TRANSPARENCY FAILURES BY NIH GRANTEES

This is just the latest example of widespread violations of the Stevens Amendment by NIH grant-receiving institutions performing wasteful animal experiments, as WCW has reported.^{4,5}

¹ Consolidated Appropriations Act, 2023, Pub. L. No. 117-328, § 505 (2022).

² [Using fMRI, new vision study finds promising model for restoring cone function](#), PennVet News Room; Accessed: 2/10/25.

³ [U24EY029890](#), \$7,261,894; [R01EY006855](#), \$23,402,481; [R01EY017549](#), \$14,124,201; [P30EY001583](#), \$21,730,306

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

⁵ [Up in smoke: WCW report exposes wasteful cannabis and ‘vape’ animal experiments](#), WCW Blog, 4/20/2022

A Government Accountability Office (GAO) audit that followed the release of WCW's report cited our troublesome findings and wrote, "NIH officials stated that they do not specifically monitor for Stevens Amendment compliance."^{6,7}

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."

Following that report, NIH's Grants Policy Statement was amended to reflect these requirements and the agency issued notices specifically reminding grantees of this transparency mandate.^{8,9} Unfortunately, it appears NIH's grantees continue to violate the law with impunity.

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, add penalties for noncompliance, and extend it to cover all recipients of federal funds.¹⁰

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 UPenn's violation of federal law documented in this letter and debar their animal experimenters from future funding 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 km@whitecoatwaste.org or 202-643-8453.

We look forward to seeing this violation remedied promptly.

Sincerely,
Kailey Mauro

Kailey Mauro
Research and Investigations Assistant
White Coat Waste Project

⁶ [Feds confirm WCW report on animal testing transparency violations, propose reforms](#), WCW Blog, 3/14/2019

⁷ [Agency action required to ensure grantees identify federal contribution amounts](#), Government Accountability Office, 3/14/2019

⁸ [NIH grants policy statement \(Sec. 4.2.1\), Acknowledgement of federal funding](#).

⁹ [NIH notice of legislative mandates in effect for FY 2023](#), 2/3/2023

¹⁰ [Wasteful animal tests prompt COST Act re-introduction](#), WCW Blog, 3/14/23