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INSPECTOR GENERAL

U.S. Department of Defense

JUNE 18, 2024



(U) Management Advisory: Review of DoD Funds Provided to the People's Republic of China and Associated Affiliates for Research Activities or Any Foreign Countries for the Enhancement of Pathogens of Pandemic Potential

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INDEPENDENCE ★ INTEGRITY ★ EXCELLENCE ★ TRANSPARENCY

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OFFICE OF INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
 4800 MARK CENTER DRIVE
 ALEXANDRIA, VIRGINIA 22350-1500

June 18, 2024

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE (RESEARCH AND ENGINEERING)
 ASSISTANT SECRETARY OF DEFENSE (HEALTH AFFAIRS)

SUBJECT: (U) Management Advisory: Review of DoD Funds Provided to the People's Republic of China and Associated Affiliates for Research Activities or Any Foreign Countries for the Enhancement of Pathogens of Pandemic Potential (Report No. DODIG-2024-099)

(U) The purpose of this management advisory is to inform Congress and DoD leadership of the results of our review required in response to Public Law 118-31, "National Defense Authorization Act for Fiscal Year 2024," section 252, "Audit to Identify Diversion of Department of Defense Funding to China's Research Labs. Section 252 requires our office to identify and report to Congressional Defense Committees:

(U) ...the amount of Federal funds awarded by the Department of Defense (whether directly or indirectly) through grants, contracts, subgrants, subcontracts, or any other type of agreement or collaboration, during the 10-year period immediately preceding such date of enactment, that—

(U) (1) was provided, whether purposely or inadvertently, to—

(U) (A) the People's Republic of China;

(U) (B) the Communist Party of China;

(U) (C) the Wuhan Institute of Virology or any other organization administered by the Chinese Academy of Sciences;

(U) (D) EcoHealth Alliance, Inc. for work performed in China on research supported by the Government of China, including any subsidiaries and related organizations that are directly controlled by EcoHealth Alliance, Inc.;

(U) (E) the Academy of Military Medical Sciences or any of its research institutes, including the Beijing Institute of Microbiology and Epidemiology; or

(U) (F) any other lab, agency, organization, individual, or instrumentality that is owned, controlled (directly or indirectly), or overseen (officially or unofficially) by any of the entities listed in subparagraphs (A) through (E); or

(U) (2) was used to fund research or experiments that could have reasonably resulted in the enhancement of any coronavirus, influenza, Nipah, Ebola, or other pathogen of pandemic potential or chimeric versions of such a virus or pathogen in the People's Republic of China or any other foreign country.

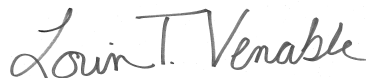
(U) Section 252 of the FY 2024 NDAA also requires our office to identify “(1) the countries in which the research or experiments described in subsection (a)(2) was conducted; and (2) the pathogens involved in such research or experiments.”

(U) Section 252 of the FY 2024 NDAA was enacted on December 22, 2023, and it requires the Inspector General of the DoD to submit a report to the congressional defense committees, within 180 days of the legislative enactment, on the amount of Federal funds that the DoD directly or indirectly awarded for China’s research activities. We performed this review with integrity, objectivity, and independence, as required by the Council of the Inspectors General on Integrity and Efficiency’s Quality Standards for Federal Offices of Inspector General.

(U) This report contains information that has been redacted because it was identified by the Department of Defense as Controlled Unclassified Information (CUI) that is not releasable to the public. CUI is Government-created or owned unclassified information that allows for, or requires, safeguarding and dissemination controls in accordance with laws, regulations, or Government-wide policies.

(U) We provided a copy of the discussion draft management advisory to Under Secretary of Defense (Research and Engineering), Assistant Secretary of Defense (Health Affairs), U.S. Army Medical Research and Development Command, and Defense Threat Reduction Agency officials and considered their comments when preparing the final management advisory. We appreciate the cooperation and assistance received during this review. If you have any questions, please contact me at [REDACTED].

FOR THE INSPECTOR GENERAL:



Lorin T. Venable, CPA
Assistant Inspector General for Audit
Financial Management and Reporting

(U) DoD Funds Awarded to China or Other Foreign Countries for Pathogen Research

(U) Army officials identified 12 Congressionally Directed Medical Research Programs (CDMRP) grant awards responsive to the scope of our review. For seven awards, a prime awardee provided funds to a subawardee or contracting research organization in China or other foreign countries for research related to potential enhancement of pathogens of pandemic potential.¹ In addition, the Army identified five awards for \$9.9 million to prime awardees that subawarded costs or contracted for services with Chinese entities for research activities unrelated to the enhancement of pathogens.

(U) The Defense Threat Reduction Agency identified 13 projects, totaling \$46.7 million, awarded to EcoHealth Alliance, Inc. from 2014 through 2023. However, none of this funding was allocated to China, its affiliates, or for research involving enhancement of pathogens. The identified projects focused on pathogen-related biosurveillance studies and training in various foreign countries.² Specifically, of the \$46.7 million, \$44.5 million was awarded to EcoHealth Alliance, Inc. as the prime grant awardee and \$2.2 million was awarded to EcoHealth Alliance, Inc. as a subawardee. The Defense Threat Reduction Agency also provided \$7.4 million in funds to EcoHealth Alliance, Inc. for research to understand and develop a capability called the Global Rapid Identification Tool System. This system facilitated rapid, high probability diagnosis of outbreaks to pinpoint disease threats faster than current public health systems and diagnostics.

(U) We did not identify any other contracts or grants for research related to pathogen research and enhancement of pathogens listed in section 252 of the FY 2024 NDAA. However, we did encounter significant challenges in searching for awards related to section 252 of the FY 2024 NDAA reporting requirement due to limitations in the DoD's systems used to track contracts and grants. Therefore, the full extent of DoD funds provided to Chinese research laboratories or other foreign countries for research related to enhancement of pathogens of pandemic potential is unknown. Our results were consistent with observations identified

¹ (U) *Journal Frontiers in Bioengineering and Biotechnology*, August 26, 2022, states that the term 'gain-of-function' means "to enhance a function by genetic manipulation" or "to add a new function" and applies to much research involving genetic recombination and genetic manipulation. However, in the study of pathogens in infectious diseases, especially in influenza research, mutations in viral genes may cause changes in pathogenicity, infectivity, transmissibility, or host range, and thus alter the characteristics of the disease. Therefore, research is conducted to deliberately introduce mutations and explore them.

(U) National Institutes of Health, "Research Involving Enhanced Potential Pandemic Pathogens," June 5, 2023, states that potential pandemic pathogens are bacteria, viruses and other microorganisms that are likely highly transmissible and capable of wide, uncontrollable spread in human populations and highly virulent, making them likely to cause significant morbidity or mortality in humans. Examples of pathogens that have the potential to cause human pandemics, or have caused a human pandemic, include the bird or avian influenza, which caused an epidemic in several countries in 2003, and Severe Acute Respiratory Syndrome Coronavirus 2, which causes COVID-19 disease. Some mutations in nature can cause pathogens to gain new functions or enhance existing characteristics, such as fitness or pathogenicity (ability to cause disease).

² (U) As specified in section 252 of the FY 2024 NDAA, our review included DoD funds awarded directly or indirectly to EcoHealth Alliance, Inc. for work performed in China on research supported by the government of China, including any subsidiaries and related organizations that are directly controlled by EcoHealth Alliance, Inc.

(U) by the Government Accountability Office (GAO) in Report No. GAO-22-105313, “Information on Funding for U.S.-China Research Collaboration and Other International Activities,” dated September 29, 2022. Specifically, the GAO concluded in its report that the full extent of funding provided to Chinese entities is not known due to data limitations in Federal subaward reporting requirements.

(U) Background

(U) Section 252 of the FY 2024 NDAA requires that the DoD Inspector General submit a report to the congressional defense committees within 180 days of December 22, 2023. The legislation requires a report on the amount of Federal funds awarded by the DoD, directly or indirectly, through grants, contracts, subgrants, subcontracts, or any other type of agreement or collaboration, to Chinese research labs or to fund research or experiments in China or other foreign countries that could have reasonably resulted in the enhancement of pathogens of pandemic potential, from 2014 through 2023. In addition, the legislation specifically named Chinese government entities, affiliates, and one government contractor, as being part of the study.

(U) Research Performed During Our Review

(U) We coordinated with officials from 23 DoD organizations responsible for policy, oversight, and program management, related to the review objective, to obtain an understanding of their funding processes related to grants, subgrants, contracts, and subcontracts. Table 1 shows the DoD organizations and other Federal organizations contacted during the review.

(U) Table 1. Federal Organizations Contacted During the Review of DoD Funds Provided to the People’s Republic of China and Associated Affiliates or Any Foreign Countries for Pathogen Research

(U) Department of Defense Organizations and Other Federal Contacts

During our review, we coordinated with DoD policy and budgeting organizations, research funding and performing organizations, and oversight organizations.

DoD Policy and Budgeting Organizations

- Office of the Under Secretary of Defense (Comptroller)/Chief Financial Officer
- Office of the Under Secretary of Defense (Research and Engineering)
- Office of the Assistant Secretary of Defense (Health Affairs)
- Office of the Deputy Assistant Secretary of Defense (Chemical and Biological Defense)
- Office of the Deputy Assistant Secretary of Defense Industrial Base Policy

DoD Funding and Performing Organizations

- | | |
|--|---|
| <ul style="list-style-type: none"> • Defense Advanced Research Projects Agency • Defense Threat Reduction Agency • Defense Health Agency • Uniformed Services University of the Health Sciences • U.S. Army Medical Research and Development Command • Army Futures Command • Joint Program Executive Office for Chemical, Biological, Radiological and Nuclear Defense • U.S. Army Medical Research Acquisition Activity • U.S. Army Medical Research Institute of Infectious Diseases | <ul style="list-style-type: none"> • Walter Reed Army Institute of Research • Office of Naval Research • Naval Medical Research Command • Office of the Secretary of the Air Force, Concepts, Development, and Management • Office of the Assistant Secretary of the Air Force for Acquisition, Technology, and Logistics • Office of the Assistant Secretary of the Air Force for Space Acquisition and Integration • Air Force Research Laboratory • U.S. Air Force Academy • Air Education and Training Command |
|--|---|

Non-DoD Oversight Organizations and Research Institutes

- U.S. Government Accountability Office
- Congressional Research Service
- U.S. Department of Health and Human Services Office of Inspector General
- Department of Veterans Affairs Office of Inspector General

(U)

(U) Source: The DoD OIG.

(U) We requested specific information from the DoD organizations listed in Table 1. We sent a broad request for information and provided a more targeted questionnaire—both aimed at identifying the amounts of funding the organizations may have provided to China and affiliates or other foreign countries for research activities, including those activities related to enhancement of pathogens of pandemic potential. In addition, we conducted searches of multiple data sources of Federal and DoD spending information, including [USAspending.gov](https://www.usaspending.gov), for awards related to research identified in section 252 of the FY 2024 NDAA.³ For details on the funding inquiries we conducted, see the Appendix. We also requested that the DoD OIG’s Defense Criminal Investigative Service, Administrative Investigations, and Evaluations Components conduct searches for cases, investigations, and evaluations related to research identified in section 252 of the FY 2024 NDAA. We considered those search results in our review.

(U) Management Representations on Enhancement of Pathogens

(U) The DoD officials we interviewed stated that DoD organizations did not actively participate in or knowingly fund research or experiments that could have reasonably resulted in the enhancement of pathogens of pandemic potential from 2014 through 2023. We conducted interviews with 120 officials from 21 Defense organizations and corresponded with individuals from an additional 2 Defense organizations. Through these interviews, correspondence with officials from a total of 23 Defense organizations, and analysis of six questionnaire responses from officials at DoD organizations, we determined that DoD officials viewed the enhancement of pathogens of pandemic potential as offensive biological work that does not align with the mission and authorities of the DoD. Army research officials clarified that President Nixon’s public papers and international agreements prohibited research by the DoD for offensive purposes.⁴ Army officials also stated that all pathogen research is for defensive purposes in support of understanding the threat, developing diagnostic systems to identify the threat, and developing medical countermeasures to prepare for, or respond to, the threat. During our review, we did not identify any information to contradict these statements.

³ (U) [USAspending.gov](https://www.usaspending.gov) is a publicly accessible and searchable website mandated by the Federal Funding Accountability and Transparency ACT and managed by the U.S. Treasury. Its mission is to show the American public what the U.S. Government spends every year by providing the American public with access to information on how their tax dollars are spent. [USAspending.gov](https://www.usaspending.gov) is the official source for spending data for the U.S. Government.

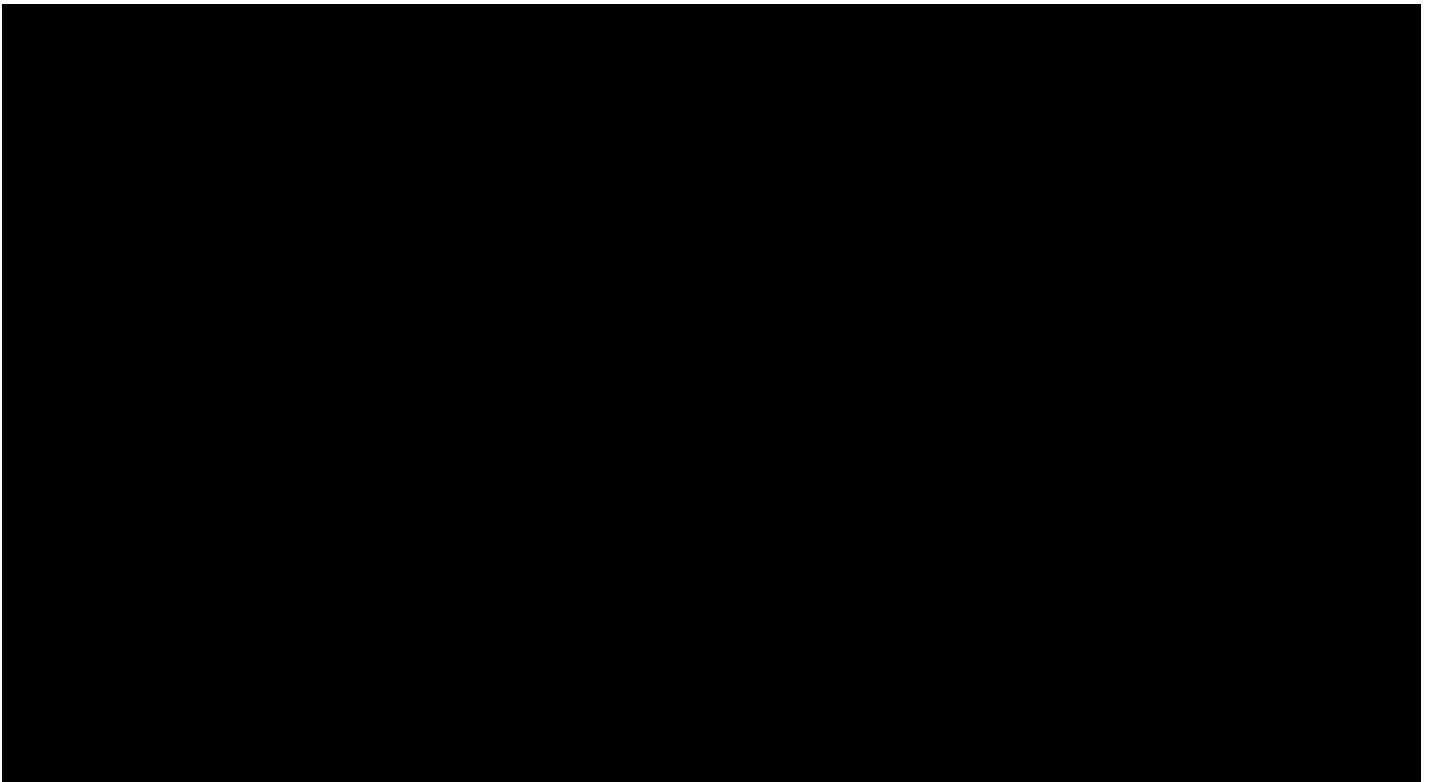
⁴ (U) Public Papers of the Presidents of the United States. Richard M. Nixon, Item 461, “Statement on Chemical and Biological Defense Policies and Programs,” November 25, 1969.

(U) League of Nations, 1925 Geneva Protocol, “Protocol for the Prohibition of the Use in War of Asphyxiating, Poisonous or Other Gases, and of Bacteriological Methods of Warfare,” signed May 4 through June 17, 1925, entered into force on February 8, 1928.

(U) Army-Identified Contracts and Awards

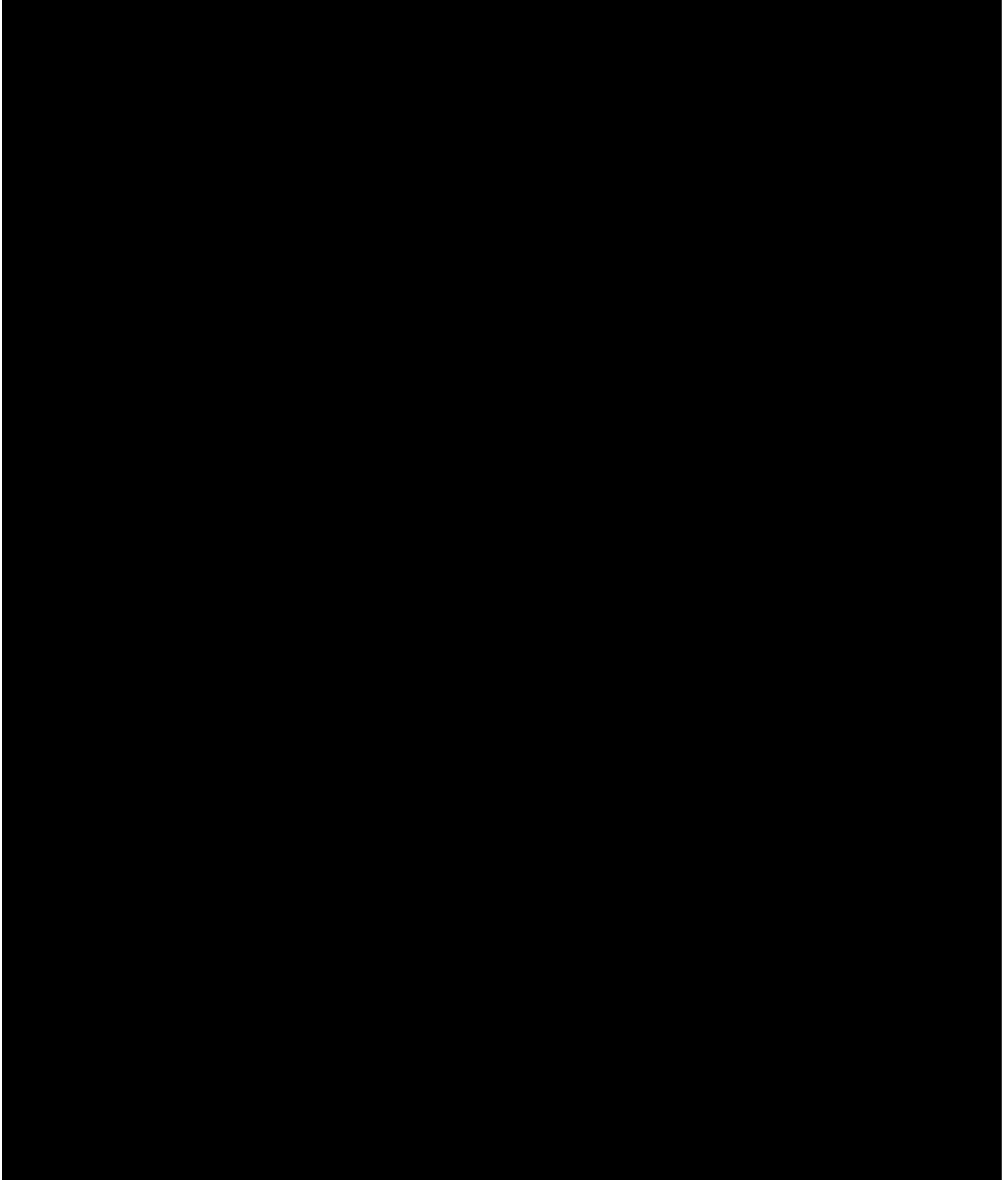
(U) In response to our meetings and data requests, U.S. Army Medical Research and Development Command (USAMRDC) officials self-identified seven CDMRP awards, subawards, or fee-for-service agreements that involved potential enhancement of pathogens in foreign countries. However, the officials also stated that the research does not necessarily enhance the virus for pathogenic potential. For example, the research involved modification of a virus to infect a rodent versus a human or combining genetic sequences to produce a protein to develop antibodies to study immune response. USAMRDC officials further stated that these procedures are not strengthening the virus. We did not receive any information during our review that contradicted the statements from USAMRDC officials. Figure 1 and Table 2 provide details about those awards.

(U) Figure 1. Map of Army CDMRP Pathogen Enhancement Projects from 2014 through 2023



(U) Source: The USAMRDC.

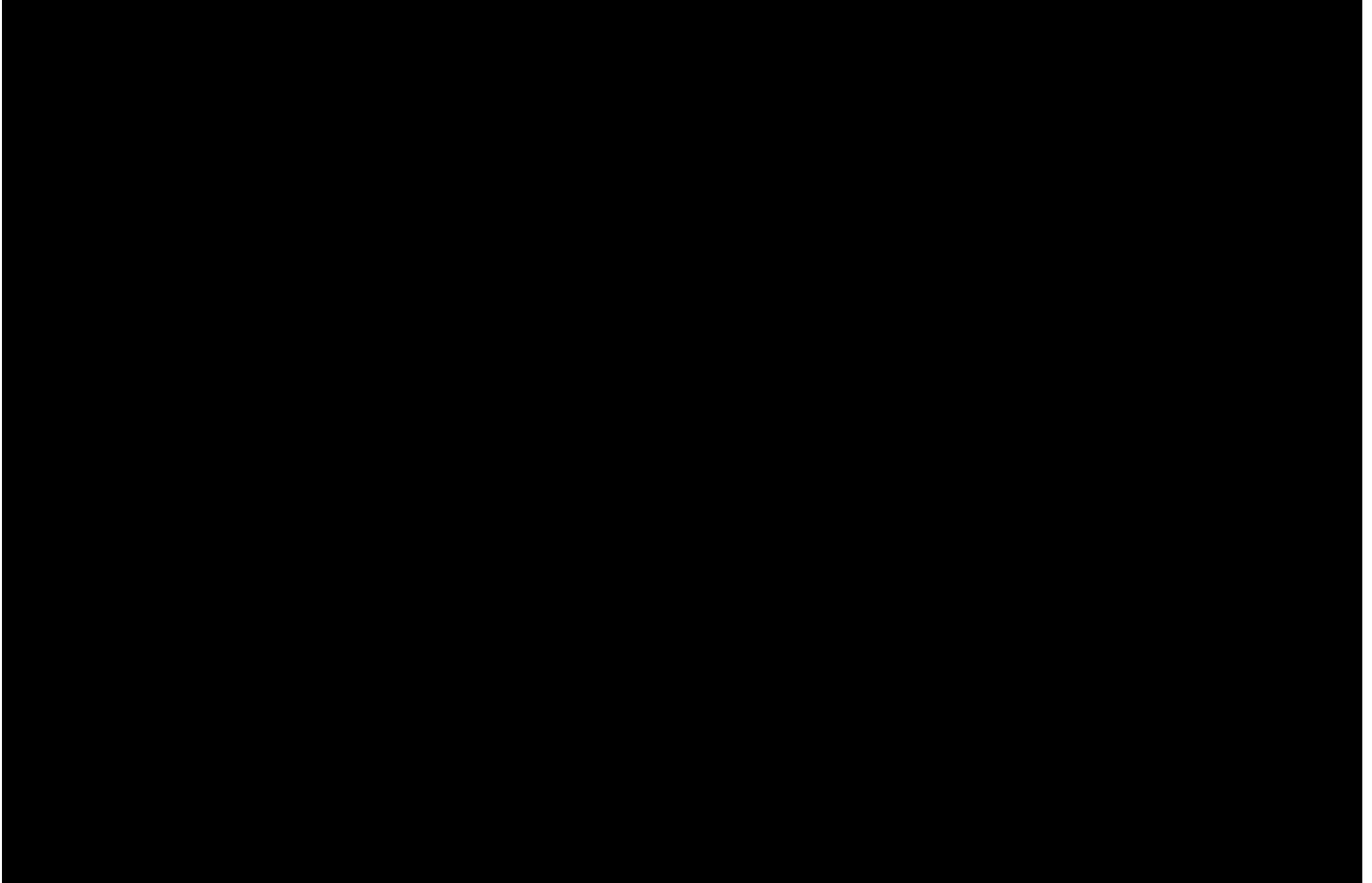
(U) Table 2. Army CDMRP Pathogen Enhancement Projects from 2014 through 2023



(U) Source: The USAMRDC.

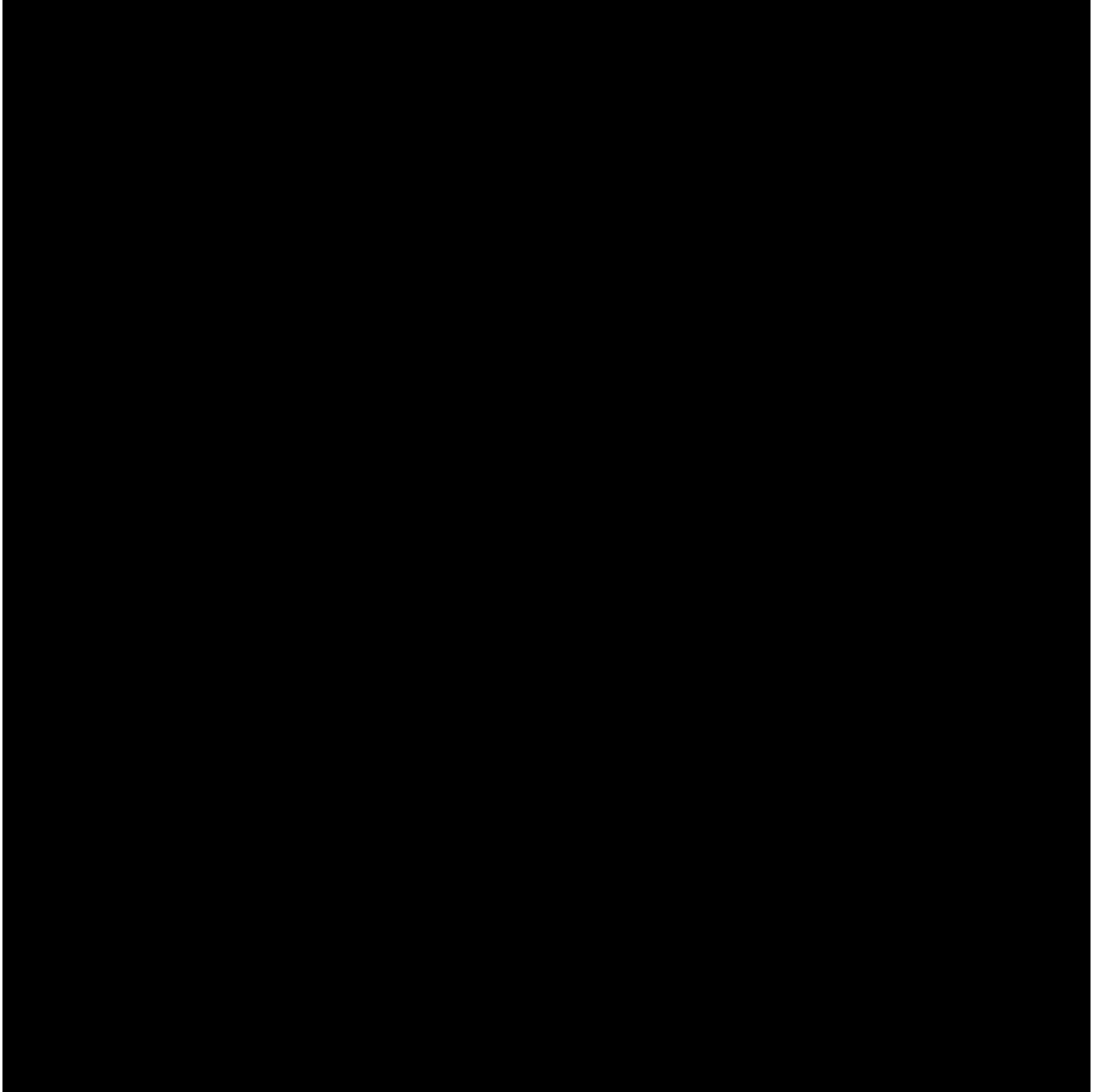
(U) In addition, the USAMRDC identified five other awards that included Chinese entities in the research of pathogens; however, the research did not involve pathogen enhancement and none of these entities were specifically mentioned in section 252 of the FY 2024 NDAA. Figure 2 and Table 3 provide details about those awards.

(U) Figure 2. Map of Army CDMRP Pathogen Research Projects Involving Chinese Entities from 2014 through 2023



(U) Source: The USAMRDC.

(U) Table 3: Army CDMRP Pathogen Research Projects Involving Chinese Entities from 2014 through 2023



(U) Source: The USAMRDC.

(U) The CDMRP originated in 1992 through a congressional appropriation to develop innovative approaches to biomedical research in response to the expressed needs of its stakeholders—the American public, military, and Congress. The annual Defense Appropriations Act funds CDMRP. Funding for the CDMRP is not part of the DoD’s core mission; therefore, the DoD does not include it in its budget request. Rather, Members of Congress add CDMRP funds every year during the budget approval cycle. The USAMRDC is the DoD’s designated executive agent for the CDMRP. The USAMRDC and Defense Health Agency exercise primary responsibility for CDMRP oversight, program execution, grant management, follow-on research, and implementation of science activities. The CDMRP website, which can be accessed at <https://cdmrp.health.mil>, is publicly available and provides transparency on programs and funding.

(U) Data Repositories

(U) We analyzed data collected from USAspending.gov and associated repositories. [USAspending.gov](https://www.usaspending.gov) is the official source for spending data for the U.S. Government and serves as a central repository for the following data sources.

- (U) Treasury account balances
- (U) Governmentwide Treasury Account Symbol Adjusted Trial Balance System
- (U) Federal Procurement Data System
- (U) Financial Assistance Broker Submission
- (U) System for Award Management
- (U) Federal Funding Accountability and Transparency Act Subaward Reporting System

(U) We generated multiple reports from the [USAspending.gov](https://www.usaspending.gov) award search tool. Each report contained the award identifier, funding total, awarding organization, prime awardee, country of awardee, country of performance, and description of the transaction. Each report also contained additional funding data on awarding agency subaward and recipient subawardee.

(U) For example, we pulled data from 2014 through 2023 and identified the following summaries from grant and contract totals.

- (U) Prime Award Summaries—12,660 grants totaling \$1,430,808,222
- (U) Assistance Subawards Summaries—1,151 subgrants totaling \$329,682,285
- (U) Contract Prime Award Summaries—39,767 contracts totaling \$4,151,500,597
- (U) Contract Subawards—2,341 subcontracts totaling \$772,250,196

(U) Because the population included thousands of awards, we were unable to review every award within the 180-day time constraint imposed on this statutory requirement. As a result, we performed key word searches. Specifically, we filtered the recipient country code by “China” and identified three entries awarded by the DoD; however, none of the awards contained descriptions for research activities.

(U) Challenges Encountered

(U) Throughout our review, we discovered significant constraints with the accessibility and comprehensiveness of data housed within, or maintained by, the DoD’s information systems. These limitations hindered our ability to conduct a thorough examination of DoD funds allocated for research activities, including those activities related to enhancement of pathogens of pandemic potential. The limited time frame prescribed by Congress also restricted the procedures we performed.

(U) Additionally, we faced challenges when we attempted to confirm DoD awards in [USAspending.gov](https://www.usaspending.gov) based on the information provided by DoD organizations. In Government Accountability Office (GAO) Report No. GAO-22-105313, “Federal Research: Information on Funding for U.S.-China Research Collaboration and Other International Activities,” September 29, 2022, the GAO stated that it searched [USAspending.gov](https://www.usaspending.gov) but did not find the data sufficiently reliable to report on for the purposes of reporting objectives. Specifically, the GAO report stated that information on Federal research funds provided through subawards to Chinese entities is not fully known because of limitations in the data provided in response to Federal reporting requirements for subawards. Through our searches, interviews, and review of self-reported data provided by DoD organizations, our DoD OIG audit team also found that [USAspending.gov](https://www.usaspending.gov) did not contain sufficient information to support our reporting objective. Additionally, we reviewed [USAspending.gov](https://www.usaspending.gov) for the five Army self-identified prime awardees that subawarded costs or contracted for services with Chinese entities; however, [USAspending.gov](https://www.usaspending.gov) did not identify China as a place of performance or any Chinese entities as subawardees.

(U) Furthermore, DoD organizations did not use a budget line item or any other consistent indicator, such as assistance listing codes, that makes databases of grants, contracts, and other transaction agreements easily searchable or reviewable.⁵ A representative from the Office of the Under Secretary of Defense for Research and Engineering cautioned against using assistance listings within the [USAspending.gov](https://www.usaspending.gov) universe. According to the representative, determining which assistance listing code applies to a program is not always intuitive, which could make searching by assistance listing codes challenging.

⁵ (U) Assistance listings are numerical codes meant to denote detailed public descriptions of Federal programs that provide grants, loans, scholarships, insurance, and other types of assistance awards.

(U) In addition, the DoD did not track funding at the level of detail necessary to enable us to completely and accurately determine if the DoD provided funding to Chinese research laboratories or other foreign countries for research related to the enhancement of pathogens of pandemic potential. For example, when the DoD awards funds to an entity, the entity often provides some of those funds to other organizations for subawards or contracted services. DoD officials stated that during the initial grant application process, they have visibility over who the subaward recipients are intended to be. However, we found that DoD organizations lacked visibility of subaward information over the life of contracts and grants. DoD organizations can change subawardees during the performance period without documenting these changes. DoD officials stated that DoD organizations are not required to track subaward information beyond the initial application process. According to Office of Management and Budget guidance, the quality of data that award recipients report is the legal responsibility of the award recipient.⁶ The guidance further provides that agencies are not required to certify the quality of subaward data made available on [USAspending.gov](https://www.usaspending.gov).

(U) Furthermore, DoD officials stated that, except for the CDMRP electronic grants system, specific capabilities did not exist to search contract writing or other internal systems for awards related to pathogen research or with specific entities and countries identified in the legislation. DoD officials stated that the only way to identify potentially relevant contracts and grants would be to conduct a manually intensive review of the statement of work within each grant and contract; however, they did not have the resources to do that. Due to the limited time frame prescribed by Congress, we also did not have the time needed to request and review statements of work for all the DoD research organization awards from 2014 through 2023.

(U) Finally, it was not possible for us to identify a single source that encompasses all pathogens of pandemic potential. This is primarily because the various authoritative sources we consulted employed different criteria to define what constituted a pandemic. As a result of these discrepancies and the lack of comprehensive authority outlining the definitive characteristics of pandemic-potential pathogens, we were unable to conclusively determine which pathogens fell under this designation.

⁶ (U) Office of Management and Budget (OMB) M-18-16, "Appendix A to OMB Circular No. A-123, Management of Reporting and Data Integrity Risk," June 6, 2018. OMB Circular No. A-123, "Management's Responsibility for Enterprise Risk Management and Internal Control," December 21, 2004.

(U) Conclusion

(U) We found significant limitations with the adequacy of data, similar to the observations the GAO found in its reports. Specifically, the DoD did not track funding at the level of detail necessary to determine whether the DoD provided funding to Chinese research laboratories or other foreign countries for research related to enhancement of pathogens of pandemic potential. In addition, DoD organizations did not have visibility of subaward information throughout the life of contracts and grants. In addition, except for the CDMRP electronic grants system, DoD organizations could not effectively search award systems to identify all contracts, subcontracts, grants, and subgrants that may have been related to pathogen research performed by China and other foreign countries. As a result, DoD organizations could not produce a complete population of pathogen research grants and subawards necessary for us to conclude on the use of DoD funds provided for pathogen research.

(U) Appendix

(U) Request for Information

(U) On February 1, 2024, we distributed the memorandum, “Request for Information Related to DoD Funds Provided to the People’s Republic of China or its Affiliates for Research Activities.” We solicited points of contact from Military Departments and DoD organizations for research activities relevant to section 252 of the FY 2024 NDAA reporting requirement. See Attachment 1 for the Request for Information.

(U) DoD OIG Questionnaire

(U) From February 16 to April 2, 2024, we distributed a questionnaire to the Departments of the Army, Navy, Air Force, and select Defense organizations. The questionnaire distribution included DoD organizations that participated in medical research. Seven organizations were provided questionnaires, and we received six responses.⁷ The purpose of the questionnaire was to gather data to determine the extent to which the DoD awarded Federal funds, directly or indirectly, through grants, contracts, subgrants, subcontracts, or any other type of agreement or collaboration, during the 10-year period from 2014 through 2023, to Chinese research labs or to fund research or experiments in China or other foreign countries designed to enhance pathogens of pandemic potential. See Attachment 2 for the questionnaire.

⁷ (U) Navy officials from the Office of Naval Research and Naval Medical Research Command did not respond with a completed questionnaire but provided a statement confirming they were unable to identify any research or experiments during the period under review that could have reasonably resulted in funds provided to the People’s Republic of China and associated affiliates for research activities, or any foreign countries, for the enhancement of pathogens of pandemic potential.

(U) Attachment 1

(U) Request for Information



OFFICE OF INSPECTOR GENERAL
 DEPARTMENT OF DEFENSE
 4800 MARK CENTER DRIVE
 ALEXANDRIA, VIRGINIA 22350-1500

February 1, 2024

MEMORANDUM FOR DISTRIBUTION

SUBJECT: Request for Information Related to DoD Funds Provided to the People's Republic of China or its Affiliates for Research Activities

The purpose of this memorandum is to request information in response to Public Law 118-31, "The FY 2024 National Defense Authorization Act," section 252, "Audit to Identify Diversion of Department of Defense Funding to China's Research Labs. Section 252 requires our office to identify and report to Congressional Defense Committees:

...the amount of Federal funds awarded by the Department of Defense (whether directly or indirectly) through grants, contracts, subgrants, subcontracts, or any other type of agreement or collaboration, during the 10-year period immediately preceding such date of enactment, that—

- (1) was provided, whether purposely or inadvertently, to—
 - (A) the People's Republic of China;
 - (B) the Communist Party of China;
 - (C) the Wuhan Institute of Virology or any other organization administered by the Chinese Academy of Sciences;
 - (D) EcoHealth Alliance Inc. for work performed in China on research supported by the Government of China, including any subsidiaries and related organizations that are directly controlled by EcoHealth Alliance, Inc.;
 - (E) the Academy of Military Medical Sciences or any of its research institutes, including the Beijing Institute of Microbiology and Epidemiology; or
 - (F) any other lab, agency, organization, individual, or instrumentality that is owned, controlled (directly or indirectly), or overseen (officially or unofficially) by any of the entities listed in subparagraphs (A) through (E); or
- (2) was used to fund research or experiments that could have reasonably resulted in the enhancement of any coronavirus, influenza, Nipah, Ebola, or other pathogen of pandemic potential or chimeric versions of such a virus or pathogen in the People's Republic of China or any other foreign country.

Section 252 also requires our office to identify "(1) the countries in which the research or experiments described in subsection (a)(2) was conducted; and (2) the pathogens involved in such research or experiments."

As a result of this request for information, we may initiate an audit or evaluation, make investigative referrals, or issue management advisories or other products depending on the issues that we identify.

We may contact senior officials and managers at various offices within the DoD to obtain additional information related to our request and we may identify locations to visit.

We request that you designate a staff member to serve as our point of contact for this request within **5 days** of this memorandum. The point of contact should be a Government employee—a GS-15, pay band equivalent, or military equivalent—and knowledgeable about the subject matter outlined in Section 252, Public Law 118-31, and the systems and databases related to the objective.

(U) Request for Information (cont'd)

Send the contact's name, title, grade/pay band, phone number, and email address to audfmr@dodig.mil.

The Inspector General Act of 1978, 5 U.S.C. §§ 401-424, as amended, authorizes us to have access to personnel and materials as we determine necessary to perform our oversight in a timely manner. You can obtain information about the DoD Office of Inspector General from DoD Directive 5106.01, "Inspector General of the Department of Defense (IG DoD)," April 20, 2012, as amended, and DoD Instruction 7050.03, "Office of the Inspector General of the Department of Defense Access to Records and Information," March 22, 2013, as amended. Our website is www.dodig.mil.

If you have any questions, please contact [REDACTED].

FOR THE INSPECTOR GENERAL:



Lorin T. Venable, CPA
Assistant Inspector General for Audit
Financial Management and Reporting

(U) Request for Information (cont'd)

DISTRIBUTION:

UNDER SECRETARY OF DEFENSE (COMPTROLLER)/CHIEF FINANCIAL OFFICER, DOD
ASSISTANT SECRETARY OF DEFENSE FOR HEALTH AFFAIRS
DIRECTOR, DEFENSE ADVANCED RESEARCH PROJECTS AGENCY
DIRECTOR, DEFENSE THREAT REDUCTION AGENCY
ADMINISTRATOR, DEFENSE TECHNICAL INFORMATION CENTER
AUDITOR GENERAL, DEPARTMENT OF THE ARMY
AUDITOR GENERAL, DEPARTMENT OF THE NAVY
AUDITOR GENERAL, DEPARTMENT OF THE AIR FORCE

(U) Attachment 2

(U) DoD OIG Questionnaire

| DOD FUNDING TO CHINA AND AFFILIATES FOR PATHOGEN RESEARCH QUESTIONNAIRE | | |
|--|-------------------------|-----------------------------|
| Questions | Responses | |
| Part I | | |
| 1. What system(s)/database(s) are you using to record and monitor awards*? | | |
| 2. What system(s)/database(s) are you using to record and monitor sub-awards? | | |
| 3. What policies are you using to record and monitor awards? | | |
| 4. What policies are you using to record and monitor sub-awards? | | |
| 5. What documentation does your organization maintain to support funding for awards and sub-awards? | | |
| | | |
| 6. Has your organization awarded funds to the following from CY 2014-2023: (Please select the appropriate responses for awards and sub-awards) | Yes/No/Unknown - Awards | Yes/No/Unknown - Sub-Awards |
| a. People’s Republic of China | | |
| b. Communist Party of China | | |
| c. Wuhan Institute of Virology or any other organization administered by the Chinese Academy of Sciences | | |
| d. EcoHealth Alliance Inc. for work performed in China on research supported by the Government of China, including any subsidiaries and related organizations that are directly controlled by EcoHealth Alliance, Inc. | | |
| e. Academy of Military Medical Sciences or any of its research institutes, including the Beijing Institute of Microbiology and Epidemiology | | |
| f. any other lab, agency, organization, individual, or instrumentality that is owned, controlled (directly or indirectly), or overseen (officially or unofficially) by any of the entities listed above? | | |
| | | |

(U) DoD OIG Questionnaire (cont'd)

| 7. If your organization has answered Yes to items 6a through 6f above please record the amount of awarded funds. | Amount - Awards | Amount - Sub-Awards |
|--|-----------------|---------------------|
| a. People's Republic of China | | |
| b. Communist Party of China | | |
| c. Wuhan Institute of Virology or any other organization administered by the Chinese Academy of Sciences | | |
| d. EcoHealth Alliance Inc. for work performed in China on research supported by the Government of China, including any subsidiaries and related organizations that are directly controlled by EcoHealth Alliance, Inc. | | |
| e. Academy of Military Medical Sciences or any of its research institutes, including the Beijing Institute of Microbiology and Epidemiology | | |
| f. any other lab, agency, organization, individual, or instrumentality that is owned, controlled (directly or indirectly), or overseen (officially or unofficially) by any of the entities listed above? | | |
| 8. Are you able to provide supporting records to substantiate the funds awarded? Please explain, if necessary. | | |

(U) DoD OIG Questionnaire (cont'd)

| | |
|--|----------------|
| Part II | |
| 9. Are the system(s)/database(s) you use to record and monitor awards and sub-awards for funding medical research different than those explained in Question 1 and Question 2? If yes, explain. | |
| 10. Are the system(s)/database(s) you use to record and monitor awards and sub-awards for funding medical research in a foreign country different than those explained in Question 1, Question 2, and Question 9? If yes, explain. | |
| 11. Are the policies you use to record and monitor awards and sub-awards for funding medical research different than those explained in Question 3 and Question 4? If yes, explain. | |
| 12. Are the policies you use to record and monitor awards and sub-awards for funding medical research in a foreign country different than those explained in Question 3, Question 4, and Question 11? If yes, explain. | |
| 13. Does your organization and/or associated research entities specifically track where medical research funds are internationally? If yes, how? | |
| | |
| Part III | |
| | Yes/No/Unknown |
| 14. Has your organization awarded funds or sub-awards related to the study of pathogens in the People's Republic of China or any other foreign country between CY 2014-2023? | |
| 14a. If you answered Yes to Question 14, please explain the purpose of each applicable study. | |

(U) DoD OIG Questionnaire (cont'd)

| 15. If your organization has answered Yes to question 14, please record the following: 1) the virus or pathogen researched, 2) the associated foreign country, 3) whether the funds were provided through an award or sub-award, 4) amount funded, 5) amount expended, and 6) award number, if applicable. | 1) Foreign Country | 2) Fund provided by Award or Sub Award | 3) Amount Funded | 4) Amount Expended | 5) Award Number |
|--|--------------------|--|------------------|--------------------|---------------------|
| a. Pathogen Example - SARS-COV | Country | Sub-Award | \$250,000 | \$100,000 | 000-00-00-XX |
| b. Pathogen 1 | | | | | |
| c. Pathogen 2 | | | | | |
| d. Pathogen 3 | | | | | |
| e. Pathogen 4 | | | | | |
| f. Pathogen 5 | | | | | |
| g. Pathogen 6 | | | | | |
| h. Pathogen 7 | | | | | |
| i. Pathogen 8 | | | | | |
| j. Pathogen 9 (Please add additional rows to this questionnaire, as necessary, if additional pathogens apply.) | | | | | |

Note:

An award recipient is an entity, either foreign or domestic, that receives an award directly from a federal awarding agency. A subrecipient is an entity that receives funds to carry out part of the work. An award recipient can pass on some portion of the funds to a subrecipient to conduct part of the work. The subrecipient receives the funds through a subaward from the award recipient. An award can take the form of a grant, contract, subgrant, subcontract, or any other type of agreement or collaboration in which federal funds are assigned or disbursed.

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U.S. DEPARTMENT OF DEFENSE

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Congressional Liaison

703.604.8324

Media Contact

public.affairs@dodig.mil; 703.604.8324



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4800 Mark Center Drive
Alexandria, Virginia 22350-1500
www.dodig.mil
DoD Hotline 1.800.424.9098

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