

## Review of U.S. Geological Survey Study of SARS-CoV-2 in Bats

This is a revised version of the report prepared for public release.

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## **Results of Review**

At the request of senior officials responsible for the U.S. Geological Survey (USGS), we reviewed aspects of a USGS study. The study, which was initiated in early 2020, involved injecting bats with SARS-CoV-2, the virus that causes COVID-19. The articulated purpose of the study was to help determine the impacts of the pandemic virus on North American bat populations. The senior officials raised general concerns that focused on the USGS' authority to conduct this type of work, the protocols followed, facility safety, and the funding used for the study.

We determined that the research portion of the study had already concluded in May 2020, before we initiated our review. We also learned that there had been no reported safety incidents or reported violations of applicable guidelines. Therefore, we assessed whether the USGS complied with applicable Federal directives that establish the USGS' authority to conduct research involving zoonotic diseases (infectious diseases that are transmissible to humans from animals), as well as USGS policies and procedures regarding the approvals necessary to initiate studies involving agents such as SARS-CoV-2. In addition, we sought to verify that the facility used for the research held the required safety certificate to work with SARS-CoV-2 and that the funding that the USGS used for the study was appropriate for these purposes.

In conducting our review, we interviewed 10 USGS officials with knowledge of the study and searched thousands of email communications relating to the study from relevant USGS officials. In addition, we reviewed USGS scientific study plans and reports, safety protocols and requirements, and other USGS policies and procedures; safety requirements issued by the U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS) and the U.S. Department of Health and Human Services' Centers for Disease Control and Prevention (CDC); and U.S. Department of Homeland Security (DHS) directives. Because of the COVID-19 pandemic and associated travel restrictions, we could not, however, travel to and visit the USGS facility where the research was conducted.

We found that the USGS followed applicable Federal directives. Specifically, we analyzed the DHS National Response Framework Emergency Support Function #11, which implements an integrated Federal, State, local, tribal, territorial, and Insular Area response to significant incidents threatening the health of animals, plants, or humans exposed to animals or plants.<sup>2</sup> We determined that this Framework provides the USGS authority to conduct studies of the type addressed here. In addition, we found that the USGS employee responsible for the study submitted a project work plan and biosafety protocol in accordance with applicable USGS policies and procedures. Both documents were subsequently reviewed and approved by the required USGS management officials.

We also found that the USGS conducted the research in a facility that held a certificate of registration from the CDC and APHIS. This certificate authorized the facility to work with agents such as SARS-CoV-2.

Finally, the evidence we reviewed established that the research was appropriately funded by the USGS and a nonprofit medical corporation. The nonprofit medical corporation provided funding for specific components of the study, while the USGS provided use of the facility and covered staff salaries. We identified no violations of relevant authorities.

We provided this report to the Assistant Secretary for Water and Science for information only.

<sup>&</sup>lt;sup>2</sup> National Response Framework, U.S. Department of Homeland Security (October 28, 2019) and Emergency Support Function #11 – Agricultural and Natural Resources Annex, Federal Emergency Management Agency (June 2016).





<sup>&</sup>lt;sup>1</sup> USGS staff reported to us that all the bats used in the study were euthanized and disposed of in accordance with applicable lab safety protocols.

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