



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

National Institutes of Health
Bethesda, Maryland 20892

13 April 2021

Drs. Aleksei Chmura and Peter Daszak
EcoHealth Alliance, Inc.
460 W 34th St
Suite 1701
New York, NY 10001

Re: NIH Grant R01AI110964 and your letter of April 11, 2021

Dear Drs. Chmura and Daszak:

Thank you for your letter of April 11, 2021. We are reviewing your responses in detail.

In the meantime, though, and in interest of expediting our review, we would note that our previous letters were concerned with NIH Grant R01AI110964 (which started on started on June 1, 2014 as [documented in RePORTER](#)) and not solely with 2R01AI110964-06. Therefore, as we asked on October 23, 2020, please send us copies of *all* EcoHealth Alliance – WIV subrecipient agreements as well as any and all other documents and information describing how EcoHealth Alliance monitored WIV's compliance with the terms and conditions of award, including with respect to biosafety. While we understand that you may not have activated a subaward for year 6, we would expect there to be substantial documentation of your oversight of WIV subaward activities during years 1 through 5.

Also, as we asked, please send us copies of *all* biosafety reports; we would expect that as part of your oversight you would have copies of all such reports through at least year 5.

As a reminder, as a term and condition of award, NIH “must have the right of access to any documents, papers, or other records of the non-Federal entity which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts” (45 C.F.R. § 75.364); and must have “timely and reasonable access to the non-Federal entity's personnel for the purpose of interview and discussion related to such documents” (id.). These requirements flow down to subawards to subrecipients. 45 C.F.R. § 75.101. “Non-Federal entities must comply with requirements in [45 C.F.R. Part 75] regardless of whether the non-Federal entity is a recipient or subrecipient of a Federal award.” 45 C.F.R. 75.101. As the grantee, EcoHealth was required to have in place, “A requirement that the subrecipient permit the pass-through entity and auditors to have access to the subrecipient's records and financial statements as necessary for the pass-through entity to meet the requirements of this part.” 45 C.F.R. § 75.352(a)(5). For each of these reasons, NIH is justified in seeking the materials, information, and a site visit as requested.

Sincerely,

Michael S. Lauer -S

Digitally signed by Michael S. Lauer -S
Date: 2021.04.13 13:12:57 -04'00'

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