

Congress of the United States

Washington, DC 20515

June 19, 2026

Acting Comptroller
General Orice Williams Brown
U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

Dear Acting Comptroller Brown,

Biological data are critically important to the advancement of biotechnology in the United States. These data are especially important for unlocking the full potential of biomedicine and artificial intelligence (AI). Just as large language model chatbots such as ChatGPT and Claude are trained on vast amounts of text from the internet, biological design tools and scientific language models are trained on troves of biological data from a variety of sources including research. We request that the Government Accountability Office perform an evaluation of these four programs as they relate to the protection of bulk sensitive biological data from foreign adversaries.

Recent laws and executive orders are written to prevent foreign adversaries from acquiring bulk sensitive biological data. The four primary mechanisms include:

1. The Data Security Program, implemented by the Department of Justice's National Security Division under Executive Order (EO) 14117;
2. The Federal Trade Commission's enforcement of the Protecting Americans' Data from Foreign Adversaries Act;
3. The Committee on Foreign Investment in the United States chaired by the Department of the Treasury; and
4. The Foreign Ownership, Control, or Influence program administered by the Department of War's Defense Counterintelligence and Security Agency.

While the United States maintains its global primacy in biotechnology, mitigating emerging national security risks requires these oversight agencies to operate as a cohesive, unified front. Protecting this bulk sensitive data requires a strategy, where federal agencies operate in distinct but complementary frameworks that promote specialized oversight and seamless interagency collaboration.

Protection is critical when the Chinese Communist Party (CCP) continues to access and exploit publicly available data from around the world, including from the United States, while harvesting its own domestic datasets and closing them off to the rest of the world.¹ China's policies explicitly state that the

¹ Bethany Allen-Ebrahimian, "China Makes Genetic Data a National Resource," *Axios*, March 29, 2022, <https://www.axios.com/2022/03/29/china-makes-genetics-data-national-resource>.

government intends to prioritize the collection and use of biological data, as do statements from China's medical AI industry. This approach gives China an advantage by exploiting biological data and highlights its lack of data-sharing reciprocity.² Left unaddressed, this data-gathering strategy will allow the CCP to rapidly train advanced artificial intelligence models, threatening to permanently outpace the West in biomanufacturing and advanced biological innovation.

We respectfully request that the Government Accountability Office provide a preliminary report on its initial findings within 120 calendar days of receiving this request, followed by a full evaluation report upon completion. The evaluation should address:

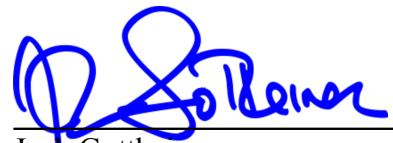
1. The effectiveness of each program at preventing foreign adversaries from acquiring bulk sensitive biological data and recommendations for improving each program's effectiveness.
2. The implementation challenges, including insufficient staffing, lack of specialized technical expertise, resource constraints and how it disproportionately impacts the effectiveness of the lesser-funded or smaller programs compared to their larger counterparts.
3. How each program defines sensitive personal data, and what enforcement or jurisdictional challenges arise from any discrepancies in those definitions, such as situations where one program may have better tools to address a particular risk but lack jurisdiction over the transaction in question.
4. Gaps in the protection of bulk sensitive biological data and how it can be eliminated.
5. Steps agencies have taken to ensure that firms are complying with any affirmative due diligence or other compliance requirements established under each program, and what challenges remain in achieving desired levels of firm compliance.
6. The extent to which the four mechanisms avoid duplication, overlap, or fragmentation in working toward protecting biological data.

Thank you for your attention to this critical matter. We look forward to your response.

Sincerely,



Pat Fallon
Member of Congress



Josh Gottheimer
Member of Congress

² Central People's Government of the People's Republic of China, "Original CSET Translation of 'National 13th Five-Year Plan for the Development of Strategic Emerging Industries,'" [国务院关于印发'十三五'国家战略性新兴产业发展规划的通知], November 29, 2016, <https://cset.georgetown.edu/publication/national-13th-five-year-plan-for-the-development-of-strategic-emerging-industries/>; Bernard Marr, "How AI And Deep Learning Are Now Used To Diagnose Cancer," Forbes, May 16, 2017, <https://www.forbes.com/sites/bernardmarr/2017/05/16/how-ai-and-deep-learning-is-now-used-to-diagnose-cancer/>.