

Foreign Influence and Involvement in University Research

The U.S. Government and federal funding agencies have expressed growing concerns regarding the impact of inappropriate or undue foreign influences on federally funded research. As a result, federal agencies have sought to clarify existing policies through new guidance and increased scrutiny. Additional oversight and reviews are in place to address the failure of federally-funded researchers at U.S. academic research institutions to disclose their relationships and activities with foreign influences and funding agencies. Several Federal agencies have indicated that failure to disclose foreign relationships and activities may jeopardize eligibility for future funding.

Southern Illinois University encourages international research and collaboration but, at the same time, is equally committed to meeting regulatory compliance in all areas of our sponsored project and research activities. It is important that all faculty members understand the current regulatory landscape surrounding research activities and the expectation that all faculty are transparent about their professional activities on behalf of the University and of outside entities including foreign relationships and activities.

The primary concern of the federal agencies falls into four main areas:

1. Failure to disclose substantial contributions or resources from other organizations, including foreign governments. This would include:
 - Foreign employment arrangements or services whether paid or not paid (e.g., mentoring students, accepting any titled academic, professional, or institutional position such as honorary, visiting, or adjunct faculty position; or board membership.)
 - Foreign grant support including in-kind resources (e.g., equipment or lab space donations.)
 - Visiting Scholars/scientists/students funded by a foreign source or unfunded.
 - Talent Programs. Participation in foreign talent programs or foreign talent recruitment programs, such as China's Thousand Talents Program must not only be disclosed to federal sponsors, but these activities must also be disclosed to the [Office of Export Control](#).
 - Foreign Grants held outside of the U.S. academic institution.

- Foreign sponsored travel
 - Honoraria or stipend (e.g., for services such as presenting results at a conference, or proposal review)
2. Failure to disclose significant foreign financial conflicts of interest. The definition of a significant foreign FCOI would include diversion of intellectual property to foreign entities and equity held in foreign companies.
 3. Compliance with Export Control laws and regulations. These laws and regulations establish the requirements for the transfer of technology and data to foreign countries and/or foreign nationals.
 4. Peer Review Violations. Sharing of confidential information with foreign entities through peer reviewers, or attempting to influence funding decisions. Information gained through the peer review process, whether reviewing proposals or publications, is confidential and should never be shared.

Best Practices:

Transparency in disclosure. As a result of these increased concerns, all investigators on sponsored projects must be aware of the funding agency's current disclosure requirements and must make every effort to ensure compliance with these disclosure requirements. Investigators should be thorough and complete in acknowledging all forms of research support, including those from foreign sources.

Foreign influences must be disclosed to:

The sponsor or funding agency:

- Disclose foreign components of federally funded research on proposals/applications, progress reports, and final technical reports. A Foreign component is defined under the NIH Grants Policy Statement, as "any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, **whether or not grant funds are expended.**" This could be by identifying a foreign component or listing a non-U.S. performance site.
- Disclose financial resources even if they relate to work that is performed outside of an investigator's appointment period. For example, if a researcher with a 9-month

appointment spends two months at a university outside of the U.S. during the summer conducting research under a foreign award, that activity should be disclosed.

- Review all pending proposals and active awards to ensure that all foreign components have been disclosed.
- Review and update “Other Support,” “Current and Pending Support,” or “Affiliates” documents. Support includes all resources and/or financial support, domestic or foreign, available in support of an investigator’s research endeavors. This information should be disclosed in accordance with Sponsor guidelines regardless of whether they are awarded through the University or another institution, or provided directly to the investigator.
- Update biosketches to include foreign relationships and activities.

The University:

- Review and update the [*“Annual Disclosure Report of Proposed Non-University Activities and Financial Interests”*](#) to include any additional or new information.
- Review and update [*“Financial Interest on Grants Disclosure Statement”*](#) to include any additional or new information.
- Contact the [Office of Export Control](#) for guidance related to export control matters including foreign travel and visiting foreign scholars/students.
- Disclose all potential inventions or other intellectual property to the [Office of Technology Transfer](#).
- Work with the [Office of Technology Transfer](#) to implement the necessary agreements prior to sharing or exchanging any materials or information.

For questions regarding Foreign Influences, Foreign Collaborations, or the requirements of the Financial Conflict of Interest on Federal Grants Policy including updating a current disclosure, please contact the [Office of Research Compliance](#).

For questions regarding completion of proposal documents as relates to Foreign Influences, Foreign Collaborations, or proposal disclosure requirements, please contact ospa@siu.edu.