# May 9, 2019 FINAL

# Subject: Responsibilities Regarding Foreign Influence on Federally Sponsored Research

Dear Colleagues,

The University of Washington is committed to international collaborative research, with partnerships and projects in over 130 countries. Our track record of collaborative research, coupled with strong individual research groups has kept the UW globally competitive and provided us opportunities critical to advancing science and to solving society’s most pressing issues. The quality of our researchers and students make the UW a leader in funding, quality and impact.

Our collaborative approach is one of our principal values, but it can expose us to foreign influence security risks and to those who would seek to exploit the U.S. academic institutions, as evidenced by recently disclosed cases of academic espionage at several U. S. universities. We are dedicated to complying with all U.S. regulations governing international research collaborations, with the goal of mitigating our inherent vulnerabilities as an academic institution to ongoing and emerging threats to our national security, while preserving our ability to engage internationally.

We will be providing regular guidance and resources including requirements for disclosure of all foreign collaborations, beginning with this communication. Look for announcements on the [Research home page](https://www.washington.edu/research/). We expect further guidance from the NIH soon, and from other federal sponsors after that. In conjunction with the Faculty Council on Research and the Research Advisory Board, we will be looking at how the UW, with our peers, define collaboration and how we can adapt research policy to this new understanding.

Sincerely,

Mary Lidstrom

Vice Provost for Research

**Foreign Influence on Federally Sponsored Research**

**Background.** Members of Congress from both parties, federal sponsor agencies, and associated government relations offices have been voicing concerns surrounding international collaborations by U. S. research universities.

August, 2018: NIH Director Francis Collins [voiced serious concern about threats to the integrity of U. S. biomedical research](http://discover.uw.edu/K00k1AQ00xbv0MyRm1680O0). He announced work with other government agencies and U.S. universities to mitigate these concerns, highlighting three areas of concern:

1. **Diversion of intellectual property** (IP) in grant applications or produced by NIH-supported biomedical research to other entities, including other countries;
2. **Disclosure of confidential information** on grant applications **by NIH peer reviewers** to foreign persons or entities, or otherwise attempting to influence funding decisions; and
3. **Failure** by some researchers working at NIH-funded institutions in the U.S. **to disclose** substantial **resources from other organizations**, including foreign governments, which threatens to distort decisions about the appropriate use of NIH funds

August 2018: The UW Office of Research provided information and guidance on Foreign Influence on the [Research home page](https://www.washington.edu/research/announcements/foreign-influence-on-federally-sponsored-research-guidance/), and to research administrators via ([MRAM](file:///C%3A%5CUsers%5Clmkelley%5CAppData%5CLocal%5CMicrosoft%5CWindows%5CTemporary%20Internet%20Files%5CContent.Outlook%5CX23VRHP3%5Cemail%20%28002%29.mht)).

December, 2018: The NIH Advisory Committee to the Director (ACD) assembled a Working Group for Foreign Influences on Research Integrity to review the concerns in Collins’ letter and develop a set of recommendations.

# February, 2019: The U.S. Department of Energy published policies to restrict research collaborations with a specific list of countries; see “[New DOE policies would block many foreign research collaborations](https://www.sciencemag.org/news/2019/02/new-doe-policies-would-block-many-foreign-research-collaborations)”.

March 2019: The Council on Government Relations (COGR) has responded to the working group recommendations in consultation with its 190 member research universities.

April 2019: The U. S. Department of Defense has issued [new requirements](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=6&ved=2ahUKEwiii9CT0ObhAhXps1QKHVICCJIQFjAFegQIBhAC&url=https%3A%2F%2Fwww.cmu.edu%2Fresearch-office%2Fcommunications%2F2019-3-20-dod-memo.pdf&usg=AOvVaw3o36FdMswqBFFBzVDre22y) for reporting other support available to all key personnel on research grants and cooperative agreements.

April 23, 2019: [Disclosing Foreign Interests in Sponsored Programs](https://www.washington.edu/research/announcements/disclosing-foreign-interests/) (OR Announcement).

**What You Need to Know Now**

If you are involved in or contemplating international collaboration, review all guidance and compliance requirements. We recommend taking an all-encompassing rather than a limited approach to disclosing international collaborations. When in doubt, disclose. Inform yourself of all sponsor requirements and follow all directions for content and format. Specific information is listed below for some major sponsors. Guidance for researchers includes the following:

* NIH funded investigators should update their **Other Support** documentation to include all substantive contributions to their research, such as personnel funded by international scholarships. NSF funded investigators should include all current and pending sources of financial and material support and commitments of time. Check the specific funding opportunity announcement and relevant agency grant policies for individual applications, as other federal agency sponsors may have different requirements.
* **Biosketches** should be current and comprehensive, including significant international academic relationships (for example, academic appointments including courtesy appointments), and collaborations.
* **Progress reports** should indicate any change in support for Key Personnel that occurred during the last budget year.
* Individuals serving on NIH, NSF or other federal agency scientific peer review panels should note and comply with all requirements to maintain the confidentiality of the information in research grant applications. In general, grant applications should never be shared with non-panel members.
* **Significant Financial Interest** **(SFI)** **disclosures** need to occur prior to an application being submitted, annually thereafter, and whenever SFI changes. Approval for compensated relationships with outside entities, including foreign entities and governments must be requested in advance as described in [Executive Order 57: Outside Professional Work for Compensation](http://www.washington.edu/admin/rules/policies/PO/EO57.html?mkt_tok=eyJpIjoiTXpJeVkyTmpNbVE0WldNMyIsInQiOiJwRVp3XC9uN0c3ajVjK0tFSVk0MDNkcGpGcitTdFpHZEVCK28wakF6YjRibDM1K1RrZ0ZlQTlQQ2xRRGlsKzJPeEhSOFpqeEJnVnhvY1wvNDBGSjJjNjBTOVlZXC8xSW5ueElxXC9qQ3p5aWd0TnIxVEdjc25TMEVRZGdZeHljbkVzQmwifQ%3D%3D). Remember to disclose in FIDS, along with any other Significant Financial Interests. These steps will ensure your relationships are transparent and comply with relevant regulations.
* The [Electronic Code of Federal Regulations](https://www.ecfr.gov) also establishes standards on [Promoting Objectivity in Research](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=992817854207767214895b1fa023755d&rgn=div5&view=text&node=42:1.0.1.4.23&idno=42#sp42.1.50.f) for institutions that receive Public Health Services funding from a grant or cooperative agreement. We recommend you review these standards.
* Intellectual property developed under a sponsored research agreement is subject to the University’s policy on [UW IP Disposition in Sponsored Program Agreements](http://discover.uw.edu/DAy110P0OQR00b06x80m0yk). Researchers must take reasonable efforts to protect the University’s interest (and, in the case of federally sponsored research, the federal government’s interest) in intellectual property developed in the course of their UW research. Inventions must be promptly reported:
* To [CoMotion](https://comotion.uw.edu/), the University’s technology transfer office.
	+ To federal research sponsors as part of progress reporting.

**Contact Information by Topic Area**

 General Announcements: [Research home page](https://www.washington.edu/research/)

 General Questions: research@uw.edu

 Sponsor Guidance: O[ffice of Sponsored Programs](https://www.washington.edu/research/osp/contact-osp/)

SFI Disclosure and/or Outside Work: Melissa Petersen

Export Controls: Mark Stomski

Guidance and Resources

**Current NIH and NSF requirements and relevant UW policies**

UW: [DOD Current and Pending Support in Proposals](https://www.washington.edu/research/announcements/department-of-defense-current-support-info-for-key-personnel-in-proposals/)
GIM 10: [Financial Conflict of Interest Policy](https://www.washington.edu/research/policies/gim-10-financial-conflict-of-interest-policy/)
GIM 40: [UW Intellectual Property Disposition in Sponsored Program Agreements](https://www.washington.edu/research/policies/gim-40/)
Executive Order 36: [Patent, Invention and Copyright Policy](http://www.washington.edu/admin/rules/policies/PO/EO36.html)
Executive Order 57: [Outside Professional Work for Compensation](http://www.washington.edu/admin/rules/policies/PO/EO57.html)

Administrative Policy Statement 47.3: [Outside Consulting Activities and Part-Time Employment by Professional or Classified Staff](https://www.washington.edu/admin/rules/policies/APS/47.03.html)

NIH: [Other Support](https://grants.nih.gov/grants/forms/othersupport.htm)
NIH: [Biosketch Format, Instructions and Samples](https://grants.nih.gov/grants/forms/biosketch.htm)
NIH: [NOT-OD-18-160 - SFI Reminder](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-18-160.html)
PHS: [Promoting Objectivity in Research](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=992817854207767214895b1fa023755d&rgn=div5&view=text&node=42:1.0.1.4.23&idno=42#sp42.1.50.f)
NSF: [Current and Pending Support](https://www.nsf.gov/pubs/policydocs/pappg19_1/pappg_2.jsp#IIC2h)
NSF: [Biographical Sketch(es) – Synergistic Activities](https://www.nsf.gov/pubs/policydocs/pappg19_1/pappg_2.jsp#IIC2fid)
NSF: [Collaborations and Other Affiliations](https://www.nsf.gov/bfa/dias/policy/coa.jsp)