

# International Engagement Series (Foreign Influence in Research)

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## Non-NIH Disclosure Requirements

**Lynn Hudachek**

**Associate Director, Division of Sponsored Programs**

<https://dsp.research.uiowa.edu/>

[NIH@uiowa.edu](mailto:NIH@uiowa.edu)

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# Agenda

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## Sponsor Foreign Disclosure Requirements:

- NSF
- NASA
- DOD
- DOE

# Sponsor Disclosure Requirements

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- Many sponsors have unique requirements for reporting foreign interests and international collaborations.
- Always check general requirements for the sponsoring agency and requirements related to the specific funding announcement, notice of award, or contract.

# Sponsor Disclosure Requirements

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## National Science Foundation (NSF)

[Frequently Asked Questions \(FAQs\) on proposal preparation and award administration related to NSF \*Proposal & Award Policies & Procedures Guide\* \(PAPPG\) \(NSF 20-1\).](#)

Some of the topics addressed in the FAQs include conference proposals, cost sharing, deadline dates, indirect costs, international activities/considerations and participant support.

# NSF Proposal Disclosure Requirements

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**6. Foreign Organizations** NSF rarely provides direct funding support to foreign organizations. NSF will consider proposals for cooperative projects involving U.S. and foreign organizations, provided support is requested only for the U.S. portion of the collaborative effort.

In cases however, where the proposer considers the foreign organization's involvement to be essential to the project (e.g., through subawards or consultant arrangements), the proposer must explain why local support is not feasible and why the foreign organization can carry out the activity more effectively. In addition, the proposed activity must demonstrate how one or more of the following conditions have been met:

- The foreign organization contributes a unique organization, facilities, geographic location and/or access to unique data resources not generally available to U.S. investigators (or which would require significant effort or time to duplicate) or other resources that are essential to the success of the proposed project; and/or
- The foreign organization to be supported offers significant science and engineering education, training or research opportunities to the U.S.

# NSF Proposal Disclosure Requirements

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## 6. Foreign Organizations cont'd

Such information must be included in the project description section of the proposal. **The box for “Funding of a Foreign Organization, including through use of a subaward or consultant arrangement” must be checked on the Cover Sheet** if the proposal includes funding for a foreign organization.

Funding of a Foreign Organization, including through use of a subaward or consultant arrangement. (See Chapter I.E.) **If this box is checked, the proposer also must enter the name of the applicable country(ies) in the International Activities Country Name(s) box...**

# NSF Current and Pending Support

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*From June 2020:*

*“Current and pending support includes all resources made available to an individual in support of and/or related to all of his/her research efforts, regardless of whether or not they have monetary value. Current and pending support also includes in-kind contributions (such as office/laboratory space, equipment, supplies, employees, students. In-kind contributions not intended for use of the project/proposal being proposed also must be reported. Current and pending support information must be provided for this project, for ongoing projects, and for any proposals currently under consideration from whatever source, irrespective of whether such support is provided through the proposing organization or is provided directly to the individual.”*

# NSF Current and Pending Support

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-To learn more about the NSF-approved formats for Current and Pending Support, please view the [NSF PAPPG \(NSF 20-1\) webinar](#) and [NSF-Approved Formats for the Biographical Sketch & Current and Pending Support Sections of NSF Proposals webinar](#).

-A [set of frequently asked questions related to current and pending support](#) also is available.



# NSF Current and Pending Support

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## Need to report:

- The lab space our investigator has in a foreign country
- The research funding the investigator gets personally or through another professional appointment (as well as his/her institutional appointment)
- The material or data provided by a third-party for use in our investigator's research
- The access to postdocs, students, technicians donated by a third party for use in our investigator's research
- Support our investigator receives from an external source to mentor a research postdoc conducting our investigator's research
- Activities that happen outside the appointment (e.g. summer months for 9 month faculty)

# — NSF Post-Award Disclosure

**NSF Article 38:** Post-award Disclosure of Current Support and In-Kind Contributions (effective on awards/increments issued **10/5/20** or later)



**Establishes a post-award disclosure requirement of undisclosed current support and in-kind contribution information.** If an organization discovers that a PI or co-PI on an active NSF award failed to disclose current support or in-kind contribution information as part of the proposal submission process, the AOR must submit the information outlined in the article within 30 calendar days of the identification of the undisclosed current support or in-kind contribution

PI/co-PI Name: • Project Title: • Award Number (if available): • Source of Support: • Primary Place of Performance: • Project Start and End Date: • Total Award Amount (including Indirect Costs): \$ • Brief Description of the Major goals of the project: • Description of any Overlap/Duplication of the project with the NSF award: • Impact on the ability of the PI/co-PI to carry out the NSF award: • Person-Month(s) (or Partial Person-Months) Per Year Committed to the Project

# NSF Biosketches

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*What types of “professional appointments” need to be identified in the biographical sketch?*

Senior personnel must identify all current domestic or foreign professional appointments outside of the individual’s academic, professional, or institutional appointments at the proposing organization.

# **NSF Research Performance Progress Report (RPPR):**

Effective October 5, 2020, the National Science Foundation (NSF) will enhance the Project Reporting System in Research.gov to implement the revised Research Performance Progress Report (RPPR). The RPPR is a uniform format for reporting performance progress on Federally funded research projects and research-related activities. NSF awardees use the RPPR to prepare and submit annual and final project reports to NSF. Further details about the RPPR can be found on the Research.gov [About Project Reports website](#).

# NSF RPPRs Cont'd

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- New Question for Project Reports with Active Other Support Changes
  - *Has there been a change in the active other support of the PI/PD(s) since the last reporting period?*
- Additional New Questions from the Revised RPPR
  - What was the impact on teaching and educational experiences? (*Impact tab*);
  - What percentage of the award's budget was spent in a foreign country? (*Impact tab*); and
  - Has there been a change in primary performance site location from that originally proposed? (*Changes/Problems tab*).

# NSF Grants Conference

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The National Science Foundation Virtual Grants Conference - the weeks of November 16 and November 30, 2020.

Registration will be **free of charge** and opens on **Thursday, October 29 at 12 p.m. EST.**

<https://nspolicyoutreach.com/>

...designed to give new faculty, researchers & administrators key insights into a wide range of current issues at NSF. NSF program officers will be providing up-to-date information about specific funding opportunities and answering attendee questions.

# NASA Foreign Involvement

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## -5.2.3 Proposals Involving Non-U.S. Organizations

-NASA does not normally fund foreign research proposals from foreign organizations, nor research efforts by individuals at foreign organizations as part of U.S. research proposals. This includes subawards from U.S. organizations to investigators at foreign organizations and travel by individuals at foreign organizations to conduct research, fieldwork, and present at conferences. Rather, each country agrees to bear the cost of discharging their respective responsibilities (i.e., the work to be done by team members affiliated with organizations in their country). The direct purchase of supplies and/or services, which do not constitute research, from non-U.S. sources by U.S. award recipients is permitted.

-NASA welcomes proposals from non-U.S. organizations and proposals that include the participation of non-U.S. organizations, **except as set forth in the certification regarding restriction on doing business with China**. Proposals that propose research to be performed by a non-U.S. organization or with a non-U.S. organization as part of a proposal submitted by a U.S. organization are normally supported through a non-exchange of funds agreement.

# NASA restriction on bilateral agreements with China

NASA Grant and Cooperative Agreement [Manual](#) (GCAM),  
Implementation Date: December 26, 2014, Revised: May 28, 2020

- Appendix C –Certifications, Assurances, and Representations
- C3.Assurance and Representation on China restrictions set out in section 1340 of PL 112-10 and section 539 of PL 112-55.
- “By submission of its proposal, the proposer represents that the proposer is not China or a Chinese-owned company, and that the proposer will not participate, collaborate, or coordinate bilaterally with China or any Chinese-owned company, at the prime recipient level or at any subrecipient level, whether the bilateral involvement is funded or performed under a no-exchange of funds arrangement.”



# NASA restriction on bilateral agreements with China

NASA FAQs: <https://science.nasa.gov/researchers/sara/faqs/prc-faq-roses>

**Q3: What about my graduate student, post-doctoral fellow, or other investigator on my team who is not at a Chinese institution but is a Chinese citizen?**

**A3: The statute does not restrict individual involvement based on citizenship or nationality. Rather, individuals are subject to the restriction if they are affiliated with institutions of the People's Republic of China or Chinese-owned companies incorporated under the laws of China. Thus, a team member who is a Chinese citizen may work on a NASA project, but an individual affiliated with an institution of the Chinese state will be subject to the statutory restriction.**

# NASA Current & Pending Support

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The NASA Proposer's Guidebook:

[https://prod.nais.nasa.gov/pub/pub\\_library/srba/propsers\\_guidebooks.html](https://prod.nais.nasa.gov/pub/pub_library/srba/propsers_guidebooks.html)

## 3.16 Current and Pending Support

PIs and Co-PIs must provide all ongoing and pending projects and proposals (regardless of salary support) in which they are performing or will perform any part of the work. Co-Is proposing to spend 10% or more of their time to the proposed effort must provide a list of ongoing and pending projects and proposals (regardless of salary support) that require a significant share (more than 10%) of their time.

# DOD Other Support Now Requested Consistently

[DoD Memorandum titled “Actions for the Protection of Intellectual Property, Controlled Information, Key Personnel and Critical Technologies \(March 2019\)”](#)

**Senior/Key Person in all FOAs for research and research-related educational activities must require all senior/key persons to report:**

- A list of all current projects the individual is working on, in addition to any future support the individual has applied to receive, regardless of the source.
- Title and objectives of the other research projects.
- The percentage per year to be devoted to the other projects.
- The total amount of support the individual is receiving in connection to each of the other research projects or will receive if other proposals are awarded.
- Name and address of the agencies and/or other parties supporting the other research projects.
- Period of performance for the other research projects.

# Department of Energy (DOE)

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- **DOE Order 486.1, Department of Energy Foreign Government Talent Recruitment Programs**
  - Employees on DOE contracts or subcontracts can't participate in a foreign government talent program from a foreign country of risk (currently, China, Iran, North Korea, and Russia) if they are working in DOE owned or leased facilities. Quarterly reports required.
- **DOE Order 486.1A, FOREIGN GOVERNMENT SPONSORED OR AFFILIATED ACTIVITIES (9-4-20)**
  - Defines "Foreign Government-Sponsored Talent Recruitment Program"
  - Information on "In-kind", "Other Support", "Positions and Appointments", etc.
  - "This further includes compensation, for example, current or promises of future: grants, awards, funding, scholarship, appointment, sabbatical, travel, university directed funding, and honoraria."
- **DOE O 142.3A, Unclassified Foreign Visits and Assignments Program**
  - December 2019 change removes the exception previously in place to declare DOE grants exempt from needing approval to involve foreign nationals doing work at non-DOE facilities

# Obtaining Approval for a Foreign National

Now appearing on new and modified DOE awards (including a no cost time extension!)


A “foreign national” is defined as any person who is not a U.S. citizen by birth or naturalization.

Must submit Form 142-1A plus passport, visa or lawful permanent residency proof, and a CV

Prior DOE approval is required before the individual can work on the project (except for existing awards, where the form must be submitted within 30 days of the term being added to the award)

NETL F 142.1-1A  
 Revised: 2/13/2019  
 Reviewed: 2/13/2019  
 (Page 2)

**U.S. DEPARTMENT OF ENERGY**  
**REQUEST FOR UNCLASSIFIED FOREIGN NATIONAL ACCESS (SHORT FORM)**



**INTRODUCTION** – Once completed and saved, entries on this form are considered Official Use Only (OUO) info. This form is to be completed by a prospective foreign national visitor or assignee and is required for all access requests. Information on the completed form will be used during the NETL foreign national access request, review, and approval, and/or submit this form can be found on the OUO Cover Sheet (above). **DO NOT** accept or transmit a complete form.

SECTION A – PERSONAL DATA			
Name of Event (if applicable)		Date of Event (if applicable)	
1a. Name of Foreign National – Last, First, Middle (See Instructions)	1b. Alias (If Used)	2. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female	3. Date of Birth (MM/DD/YYYY)
4. Place of Birth (City, Country)		5. Citizenship (List all countries)	
6a. Lawful Permanent Resident (LPR)? <input type="checkbox"/> Yes <input type="checkbox"/> No	7a. Visa Type	8a. Passport Number	9. U.S. Social Security Account Number (SSAN) (See Instructions)
	7b. Visa Number/Control Number	8b. Passport Country of Issue	
6b. LPR Card (I-551)	7c. Visa Expiration Date (MM/DD/YYYY)	8c. Passport Date of Issue (MM/DD/YYYY)	10. List other Identification Documentation (See Instructions)
6c. LPR Card (I-551) Expiration Date (MM/DD/YYYY)		8d. Passport Expiration Date (MM/DD/YYYY)	
11a. Name and Address of Employer at Start of Access Period		11b. Name and Address of Place of Work (If different from 11a.)	
Name		Name	
Street		Street	
City State/Province		City State/Province	
Zip/Postal Code Country		Zip/Postal Code Country	
12. Employment Title/Position, or Description of Duties during Access Period			
13. Employer Type of Business or Organization (e.g., Government, company, laboratory, university, etc.)			
14. Work Telephone and Facsimile (Fax) Number			
15. Cell Telephone Number/Other Telephone Number			
16. Email Address(es)			
17. Educational Background (F1 or J1 Visa holders only). Include university/college training with degrees and month/year conferred. (See Instructions)			
18. Field of Research (List topics)			

# Resources

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International Engagement [website](#) includes additional links and resources

DSP Staff Directory: <https://dsp.research.uiowa.edu/dsp-staff-directory>

[era@uiowa.edu](mailto:era@uiowa.edu) (DSP shared e-mailbox for all non-NIH/PHS communications)

#319-335-2123 – DSP main telephone number

**IOWA**