



# **University of Iowa International Research**

Presented by Division of Sponsored Programs

November 21, 2019



▶ International Research  
Background

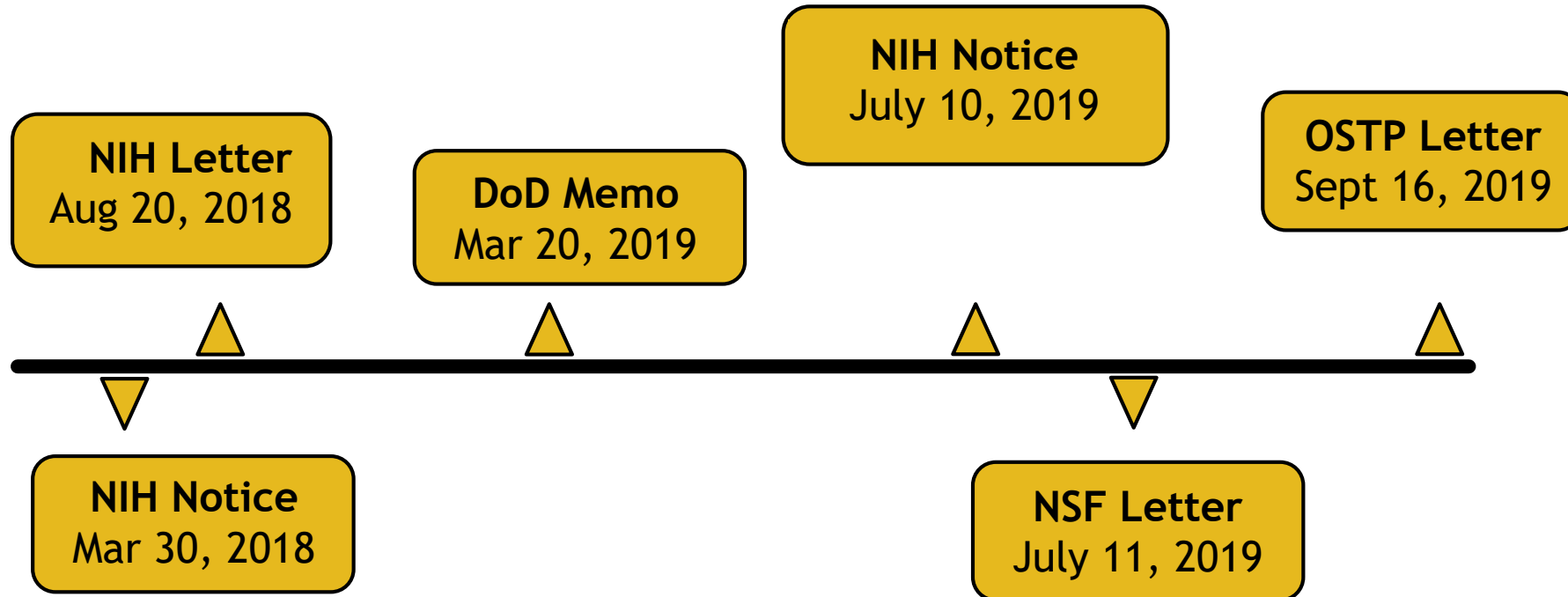
# International Research

- ▶ Excerpt from John Keller memo re: foreign interests; Jan. 28, 2019
- ▶ <https://research.uiowa.edu/impact/news/ovpr-publishes-memo-about-foreign-interests>
- ▶ “The University of Iowa is committed to fostering dynamic research collaborations while also promoting full transparency surrounding all interactions with industry and foreign entities. We also expect all members of the research community to comply with all university and sponsor policies.”



# International Research

Selected timeline examples; not a comprehensive list



NIH NOT-OD-18-160

## Financial Conflict of Interest: Investigator Disclosures of Foreign Financial Interests

March 30, 2018

- ▶ Reminder to the NIH extramural research community that the requirements of 42 CFR Part 50, Subpart F, Objectivity of Research, apply to each institution, domestic and foreign, that applies for or receives NIH research funding in the form of grants or cooperative agreements
- ▶ Purpose of the regulation: To promote objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct, and reporting of NIH-funded research is free from bias resulting from Investigator financial conflicts of interest

## NIH NOT-OD-18-160

# Financial Conflict of Interest: Investigator Disclosures of Foreign Financial Interests

- ▶ “One such area of the FCOI regulation requiring clarity is Investigator disclosures with respect to foreign financial interests. The regulation refers to exclusions of Institutions of higher education as defined in 20 U.S.C. 1001(a) or a federal, state or local government agency when disclosing financial interests. However, these references refer to a U.S. Institution of higher education or a federal, state, or local government agency within the U.S. Therefore, Investigators, including subrecipient Investigators, must disclose all financial interests received from a foreign Institution of higher education or the government of another country (which includes local, provincial, or equivalent governments of another country).”
- ▶ [See full text at: https://grants.nih.gov/grants/guide/notice-files/NOT-OD-18-160.html](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-18-160.html)

# Francis Collins, NIH Director, Dear Colleague Letter

August 20, 2018



Identified three areas of concern:



Improper diversion of intellectual property (IP) in grant applications or produced by NIH-supported biomedical research to other entities, including other countries



Sharing of confidential information on grant application by NIH peer reviewers with others, including foreign entities, or otherwise attempting to influence funding decisions



Failure by some researchers to disclose substantial resources from other organizations, including foreign governments, which threaten to distort decisions about the appropriate use of NIH funds



[https://www.insidehighered.com/sites/default/server\\_files/media/NIH%20Foreign%20Influence%20Letter%20to%20Grantees%2008-20-18.pdf](https://www.insidehighered.com/sites/default/server_files/media/NIH%20Foreign%20Influence%20Letter%20to%20Grantees%2008-20-18.pdf)

# Under Secretary of Defense Memo

March 20, 2019

- ▶ National Defense Authorization Act (NDAA) for FY19
- ▶ To support protection of intellectual property, controlled information, key personnel, and information about critical technologies relevant to national security
- ▶ To limit undue influence, including through foreign talent programs, by countries to exploit United States technology within the Department of Defense research, science and technology, and innovation enterprise
- ▶ Disclosure requirements related to new DoD Notices of Funding Opportunities
- ▶ <https://www.aau.edu/sites/default/files/Blind-Links/OUUSDResearchProtectionMemo.pdf>



# NIH NOT-OD-19-114

## Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components

July 10, 2019

- ▶ Reminder to the extramural community about the need to report foreign activities through documentation of other support, foreign components, and financial conflict of interest to prevent scientific, budgetary, or commitment overlap
- ▶ NIH Goal: Facilitate the transparency of all research activities, both domestic and foreign, not merely financial
- ▶ <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html>

# NIH NOT-OD-19-114

## Other Support

- ▶ Includes *all* resources made available to a researcher in support of and/or related to *all* of their research endeavors, regardless of monetary value and regardless of whether they are based at the institution the researcher identifies for the current grant
- ▶ Includes resource and/or financial support from all foreign and domestic entities, including but not limited to financial support for laboratory personnel, and provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.)

# NIH NOT-OD-19-114

## Foreign Components

- ▶ NIH requires recipients to determine whether activities it supports include a foreign component, defined as: The existence of any “significant scientific element or segment of a project” outside of the United States; in other words
  1. performance of work by a researcher or recipient in a foreign location, whether or not NIH grant funds are expended, and/or
  2. performance of work by a researcher in a foreign location employed or paid for by a foreign organization, whether or not NIH grant funds are expended
- ▶ If a recipient determines that a portion of the project will be conducted outside of the U.S., the recipient then will need to determine if the activities are considered significant; if both criteria are met, then there is a foreign component

# NIH NOT-OD-19-114

## Foreign Components

- ▶ Is a portion of the project being conducted outside the U.S.?
  - ▶ No - not a foreign component
- ▶ Yes - are the activities being conducted outside of the US significant?
- ▶ Indicators include:
  - ▶ Collaborations with investigators at a foreign site anticipated to result in co-authorship;
  - ▶ Use of facilities or instrumentation at a foreign site; or
  - ▶ Receipt of financial support or resources from a foreign entity
- ▶ Foreign components require NIH prior approval
- ▶ If an activity does not meet the definition of foreign component because all research is being conducted within the United States, but there is a non-U.S. resource that supports the research of an investigator and/or researcher, it must be reported as other support

# NIH NOT-OD-19-114

## Financial Conflict of Interest Disclosures

- ▶ This notice also reminds the extramural community of the requirements in 42 CFR Part 50, Subpart F, Objectivity of Research
- ▶ Investigators must disclose their significant financial interests to their institution
- ▶ This requirement includes financial interests received from a foreign entity

# NIH NOT-OD-19-114 FAQs



Frequently Asked Questions re Other Support and Foreign Components



<https://grants.nih.gov/grants/faq-other-support-foreign-components.htm>

# France Córdoba, NSF Director

## Dear Colleague Letter

July 11, 2019

“ Since 1978, NSF has required senior project personnel on proposals to disclose all sources of support, both foreign and domestic. A renewed effort is now underway to ensure that existing requirements to disclose current and pending support information are known, understood, and followed. For example, in May, we published in the Federal Register a proposed clarification of our proposal disclosure requirements (open for public comment through July 29). Our draft NSF Proposal and Award Policies and Procedures Guide includes clarifications regarding reporting requirements for both current and pending support and professional appointments. ”

See full text at:

[https://www.nsf.gov/pubs/2019/nsf19200/research\\_protection.jsp](https://www.nsf.gov/pubs/2019/nsf19200/research_protection.jsp)

# Kelvin Droegemeier, Director, Office of Science & Technology Policy

## Letter to the U.S. Research Community

September 16, 2019

“ Breaches of research ethics, both within talent programs and more generally, include the failure to disclose required information such as foreign funding, unapproved parallel foreign laboratories (so-called shadow labs), affiliations and appointments, and conflicting financial interests. Other inappropriate behaviors include conducting undisclosed research for foreign governments or companies on United States agency time or with United States agency funding, diversion of intellectual property or other legal rights, and breaches of contract and confidentiality in or surreptitious gaming of the peer-review process.

As Director of The White House Office of Science and Technology Policy (OSTP), I see a significant opportunity for the Federal Government, research institutions, private companies, nonprofit organizations, and law enforcement to come together to ensure the integrity and security of the American research enterprise in light of increasing threats. Striking the right balance between openness and security, using a risk-based framework, is especially important.

With regard to research security, JCORE (Joint Committee on the Research Environment) is organizing its work along the following four lines of effort:

- ▶ **Coordinating outreach and engagement** with Federal agencies, academic research institutions, companies, non-governmental organizations, researchers, and students. In order to help relay the nature and scope of the challenges America faces, JCORE is assembling an array of examples in which our research enterprise was exploited or compromised.
- ▶ **Establishing and coordinating disclosure requirements** for participation in the federally funded research enterprise. Disclosure is a central tenet of research integrity and a key mechanism for ensuring compliance with applicable policies and laws.
- ▶ **Developing best practices for academic research institutions**, in collaboration with academia, professional societies, and other organizations.
- ▶ **Developing methods for identification, assessment, and management of risk** in the research enterprise.

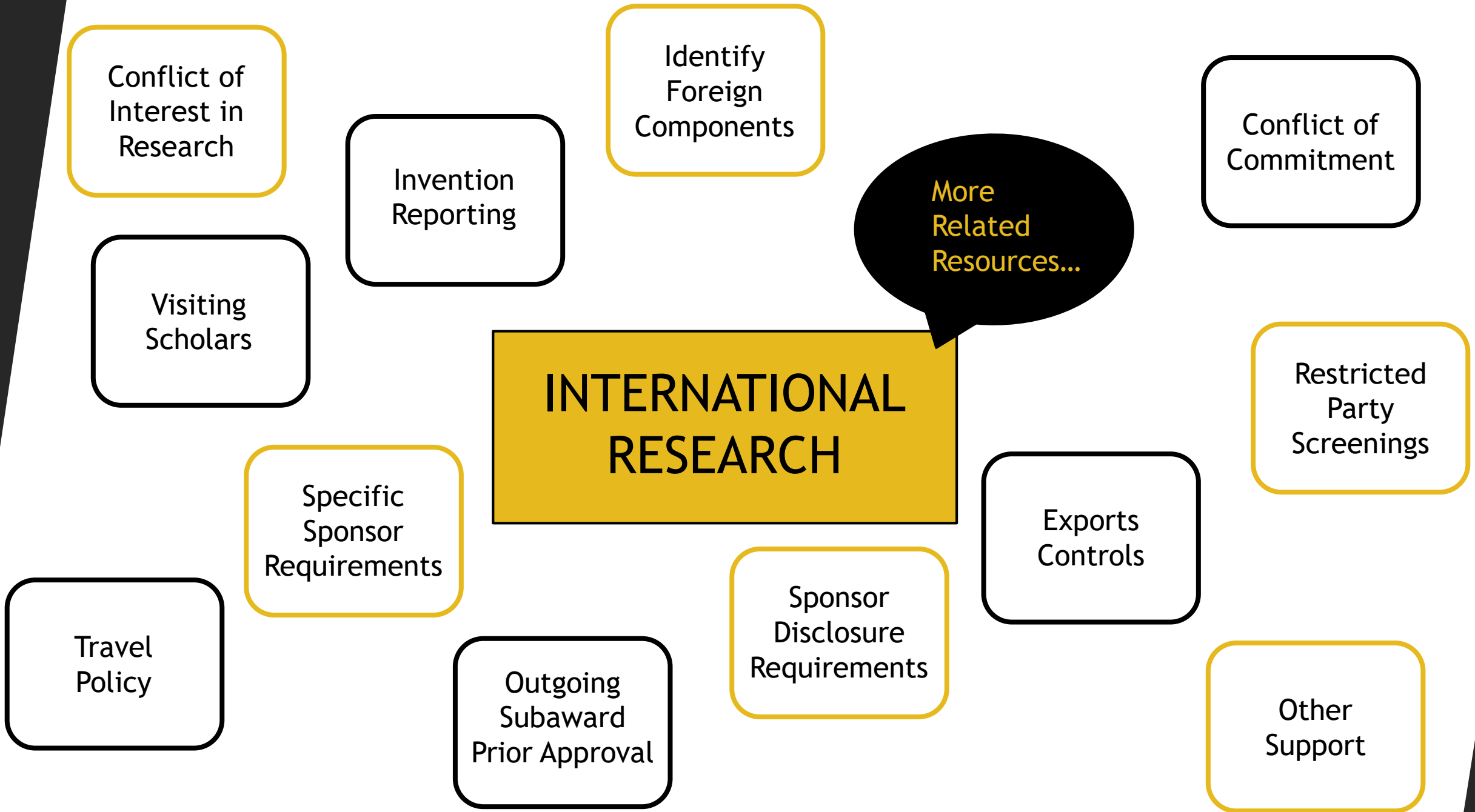
Working together, we will ensure that our research environments are safe and inclusive; operate with maximum integrity; protect our research assets in a manner balanced with the openness and international collaboration that have been so critical to our success; and do not encumber researchers, agencies, or institutions with unnecessary administrative work. In doing so, we will ensure America continues to lead the world in science and technology.

See full text at: <https://www.whitehouse.gov/wp-content/uploads/2019/09/OSTP-letter-to-the-US-research-community-september-2019.pdf>





▶ International Research  
Related Resources



Conflict of Interest in Research

Identify Foreign Components

Conflict of Commitment

Invention Reporting

More Related Resources...

Visiting Scholars

INTERNATIONAL RESEARCH

Restricted Party Screenings

Specific Sponsor Requirements

Exports Controls

Travel Policy

Sponsor Disclosure Requirements

Outgoing Subaward Prior Approval

Other Support

# International Research - Related Resources

## Sponsor Reporting Requirements

- ▶ Identify Foreign Components
  - ▶ NIH - “The performance of 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.”  
*“Activities that would meet this definition include, but are not limited to, (1) the involvement of human subjects or animals, (2) extensive foreign travel by recipient project staff for the purpose of data collection, surveying, sampling, and similar activities, or (3) any activity of the recipient that may have an impact on U.S. foreign policy through involvement in the affairs or environment of a foreign country. Examples of other grant-related activities that may be significant are collaborations with investigators at a foreign site anticipated to result in co-authorship; use of facilities or instrumentation at a foreign site; or receipt of financial support or resources from a foreign entity.”*
  - ▶ NSF - “For each proposal that describes an international activity, PIs should list the primary countries involved on the Cover Sheet. An international activity is defined as research, training, and/or education carried out in cooperation with foreign counterparts either overseas or in the US using virtual technologies.”
- ▶ Review the funding announcement for specific disclosures required by your sponsor

# International Research - Related Resources

## Sponsor Reporting Requirements

- ▶ Disclose Other Support/Current and Pending Support as required by the sponsor
- ▶ Prior approval is generally required for foreign collaborators/subawards
- ▶ Check the requirements for your sponsoring agency
- ▶ The [Division of Sponsored Programs](#) can assist with questions regarding sponsor requirements and requesting sponsor approval
  - ▶ Call 319-335-2123 or
  - ▶ Email [dsp@uiowa.edu](mailto:dsp@uiowa.edu)

# International Research - Related Resources

## Sponsor Requirements

- ▶ Be mindful of Peer Review confidentiality and integrity requirements
  - ▶ Core Values of [NIH Peer Review](#):
    - ▶ expert assessment
    - ▶ transparency
    - ▶ impartiality
    - ▶ fairness
    - ▶ confidentiality
    - ▶ security
    - ▶ integrity
    - ▶ efficiency

# International Research - Related Resources

## Conflict of Interest and Commitment Policies

- ▶ Conflict of Interest in Research
  - ▶ University of Iowa [Policy](#)
  - ▶ Conflict of Interest in Research [Office](#)
  - ▶ Martha Hedberg: [martha-hedberg@uiowa.edu](mailto:martha-hedberg@uiowa.edu) /  
319-384-4256
  
- ▶ The Office of the Provost provides a comprehensive list of Conflict of Interest and Commitment [Policies](#) at the UI

# International Research - Related Resources

## Export Controls

- ▶ University of Iowa [Export Controls](#)
- ▶ Studies involving export-controlled technology require additional review and compliance
- ▶ Allow time for Restricted Party Screenings on foreign sponsors and subrecipients
- ▶ Export Control Coordinators: [export-control@uiowa.edu](mailto:export-control@uiowa.edu)
  - ▶ Pat Cone-Fisher: [patricia-cone-fisher@uiowa.edu](mailto:patricia-cone-fisher@uiowa.edu) / 319-335-3582
  - ▶ Loren LeClair: [loren-leclair@uiowa.edu](mailto:loren-leclair@uiowa.edu) / 319-335-2120

# International Research - Related Resources

## Foreign Travel

- ▶ For information on the [UI Travel Policy](#) contact Purchasing, Accounts Payable & Travel / 319-335-0115
  - ▶ Fly America Act guidance; travel insurance
- ▶ For information on charging travel and other expenses to sponsored projects, contact the [UI Grant Accounting Office](#); 319-335-3801
- ▶ [UI Information Technology Security](#) provides a travel checklist and guidance on traveling with laptops or other IT equipment
- ▶ Sponsor approval is generally required for foreign travel. The [Division of Sponsored Programs](#) can assist with sponsor requirements and requesting prior approval: [dsp@uiowa.edu](mailto:dsp@uiowa.edu) / 319-335-2123



# International Research - Related Resources

## Invention Reporting; Visiting Scholars

- ▶ Inventions should be reported to the [UI Research Foundation \(UIRF\)](#) in accordance with the UI [Intellectual Property Policies](#). UIRF can assist with invention disclosures and reporting inventions as required by sponsor policies
- ▶ [International Programs](#) can assist with welcoming international students and visiting scholars to the University of Iowa

# International Research - Related Resources

## Outgoing Subawards

- ▶ Identify subawards at proposal stage
- ▶ Allow time for Conflict of Interest Form B\* completion and review if needed
  - ▶ (\*Subrecipient Conflict of Interest compliance for PHS and NSF funded projects)
- ▶ Sponsor approval is generally required for outgoing subawards
- ▶ At award stage allow additional time for issuing the subaward
  - ▶ Restricted Party Screening
  - ▶ Time difference for negotiations
- ▶ The [Division of Sponsored Programs](#) can assist with subaward questions and the [outgoing subaward process](#)

For more  
information



International Research Engagement at  
the University of Iowa



<https://dsp.research.uiowa.edu/international-engagement>



Quick Guide to the  
External Funding  
Process

<https://dsp.research.uiowa.edu/quick-guide-external-funding-process>

# Division of Sponsored Programs



- ▶ 319-335-2123
- ▶ [dsp@uiowa.edu](mailto:dsp@uiowa.edu) (General questions)
- ▶ [nih@uiowa.edu](mailto:nih@uiowa.edu) (NIH related questions)
- ▶ [era@uiowa.edu](mailto:era@uiowa.edu) (Grant-related questions other than NIH)
- ▶ [dsp-contracts@uiowa.edu](mailto:dsp-contracts@uiowa.edu) (Contract related questions)
- ▶ 2 Gilmore Hall