Research Integrity & Undue Foreign Influence

Why Foreign Influence Matters

As tensions between the U.S. and various foreign governments increase, accusations of academic espionage by foreign-supported researchers at U.S.-based research institutions are on the rise. The NIH, NSF, DOE, and other agencies are increasingly warning institutions of researchers who have not disclosed foreign associations in compliance with grant funding regulations and other laws. The government continues to initiate enforcement actions and we expect this to increase in frequency and scope during the coming months.

As a result, research and academic institutions in the U.S. need to be ever more vigilant to mitigate brand risk, the loss of federal funds, intellectual property assets and exposure to enforcement actions.

If You Have Research Grants:

▶ **Educate and Train Faculty and Research Administrators**

Develop robust training to educate researchers and administrators on disclosure requirements, the sections of NIH grant applications that address foreign activities/foreign components, and how to read award terms and conditions (as some outright prohibit foreign activities or collaborations).

▶ **Stratify Risk**

Identify your institution's highest risk research/grant portfolios or those researchers known to engage in frequent foreign collaborations to focus your review efforts.

▶ **Review Key Grant Documentation**

Review documentation for the specific purpose of identifying foreign activities, foreign components, or foreign support that should be reported as Other Support – needs to be done for Applications, Just-in-Time Reports (JITs), and Research Performance Progress Reports (RPPR) – if something is reported and prior approval is required, be sure to ask for the approval. **Be sure the "yes/no" questions are answered accurately.**

▶ **Compare Grant Submissions with Disclosures**

Compare draft grant submissions with internal institutional disclosures (to OTD, Dean's Office, IRB/IACUC, etc.) and information gleaned from other public sources (e.g., CV, lab website, basic internet searches, publication acknowledgments). Where there are inconsistencies, ask more questions and document the researcher's responses for your records. Most institutions require researchers to submit applications for internal review several days before the submission deadline. Institutions may want to lengthen the review period to better ensure that all proposed/ongoing foreign activities are identified and reported the first time – and avoid the need for corrective or supplemental submissions.