

Research Integrity & Undue Foreign Influence

In the midst of a global pandemic, international scientific collaboration has perhaps never been more important. However, the U.S. government's efforts to prevent and investigate undue foreign influence in federally-funded research remain active.

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.

How Well Do You Know Your Faculty?

Research institutions are in a unique position to help detect and prevent undue foreign influence targeting scientists and their work. The government expects federally-funded research institutions to identify conflicts of interest requiring reporting and management, to seek advance approval for foreign components, and to take reasonable steps to ensure researchers' other support is appropriately disclosed.

In addition to implementing formal conflict of interest and outside activity reporting policies, institutions should consider taking additional proactive steps:

- Survey, review, and track key disclosures by faculty/research staff to understand ex-U.S. relationships
- Conduct basic online research to determine if individuals have additional research funding, relationships, labs, etc. that have not been disclosed
- Review acknowledgments in scholarly publications for undisclosed affiliations or funding
- Ask questions: follow up on information received by interviewing researchers, colleagues, and staff
- Conduct risk-based audits: identify at-risk researchers, perhaps based on effort commitments, number of awards, or amount of funding, and conduct a "deep dive"

Takeaway

Minimal procedures can go a long way. Exercise due diligence by making reasonable, proactive inquiries into ex-U.S. activities of faculty/research staff.