

# FOREIGN INFLUENCE ON RESEARCH: HANDLING CROSS CUTTING ISSUES

How Units within Research Institutes are  
Working Together to Collect, Share & Use  
Information: A Case Study



# Presenters

## Panelists:

- **Cindy Kiel**
  - Executive Associate Vice Chancellor for Research Administration, University of California, Davis
- **Jennifer A. Ponting**
  - Executive Director of Sponsored Programs, University of Chicago
- **Nate Martinez-Wayman**
  - Senior Director, Office of Post Award Administration, Duke University
- **David Norton**
  - Vice President for Research, University of Florida
- **Moderator: Naomi Schrag**
  - Vice President for Research Compliance Training & Policy, Columbia University

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# Presentation Overview

- Regulatory Landscape & Government Concerns
- Challenges Institutions Face in Responding
- Institutional Overviews
- Case Study
- Question and Answer Period

# Regulatory Landscape

- Presidential *Proclamation on the Suspension of Entry as Nonimmigrants of Certain Students and Researchers from the People's Republic of China*, May 29, 2020
- NIH NOT-OD-19-114 *Reminders of NIH Policies on Other Support and on Policies Related to Financial Conflicts of Interest and Foreign Components*
- NIH *Grants Policy Statement*
- NSF PAPPG
  - Effective Date: June 1, 2020 II.C.2.f & h. (Current & Pending Support and Biosketches)
- OSTP JCORE activities
- Dept. of Energy Order 486.1 & Technology Risk Matrix

# New COGR Resource

- Science & Security Resources webpage! June 2020
  - <https://www.cogr.edu/science-and-security>

# Areas of Governmental Focus



Reporting failures:  
Non-disclosure of other support or appointments



Intellectual Property (IP) theft



Export control violations



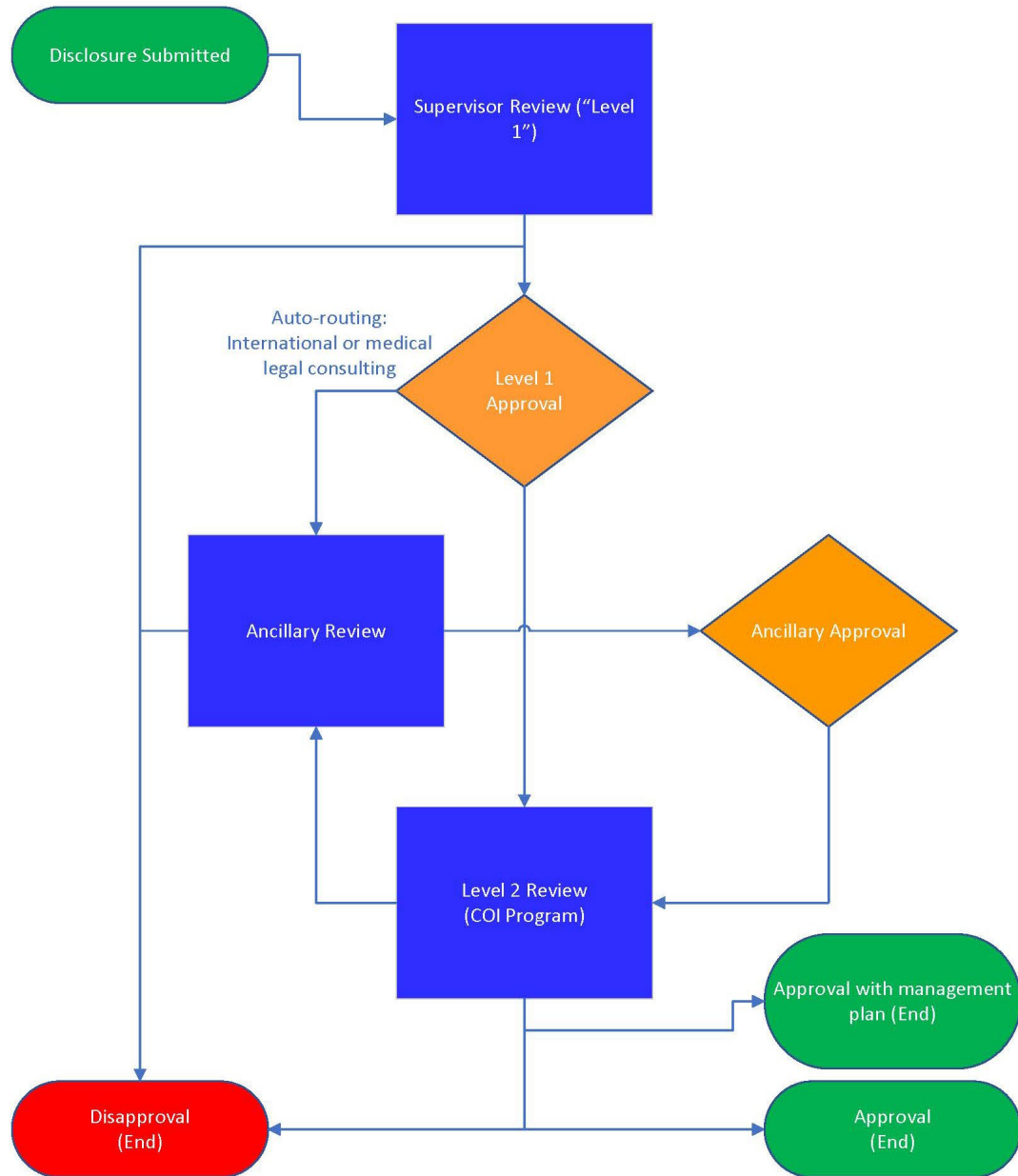
# INSTITUTIONAL OVERVIEWS

Institution's responses to governmental concerns.





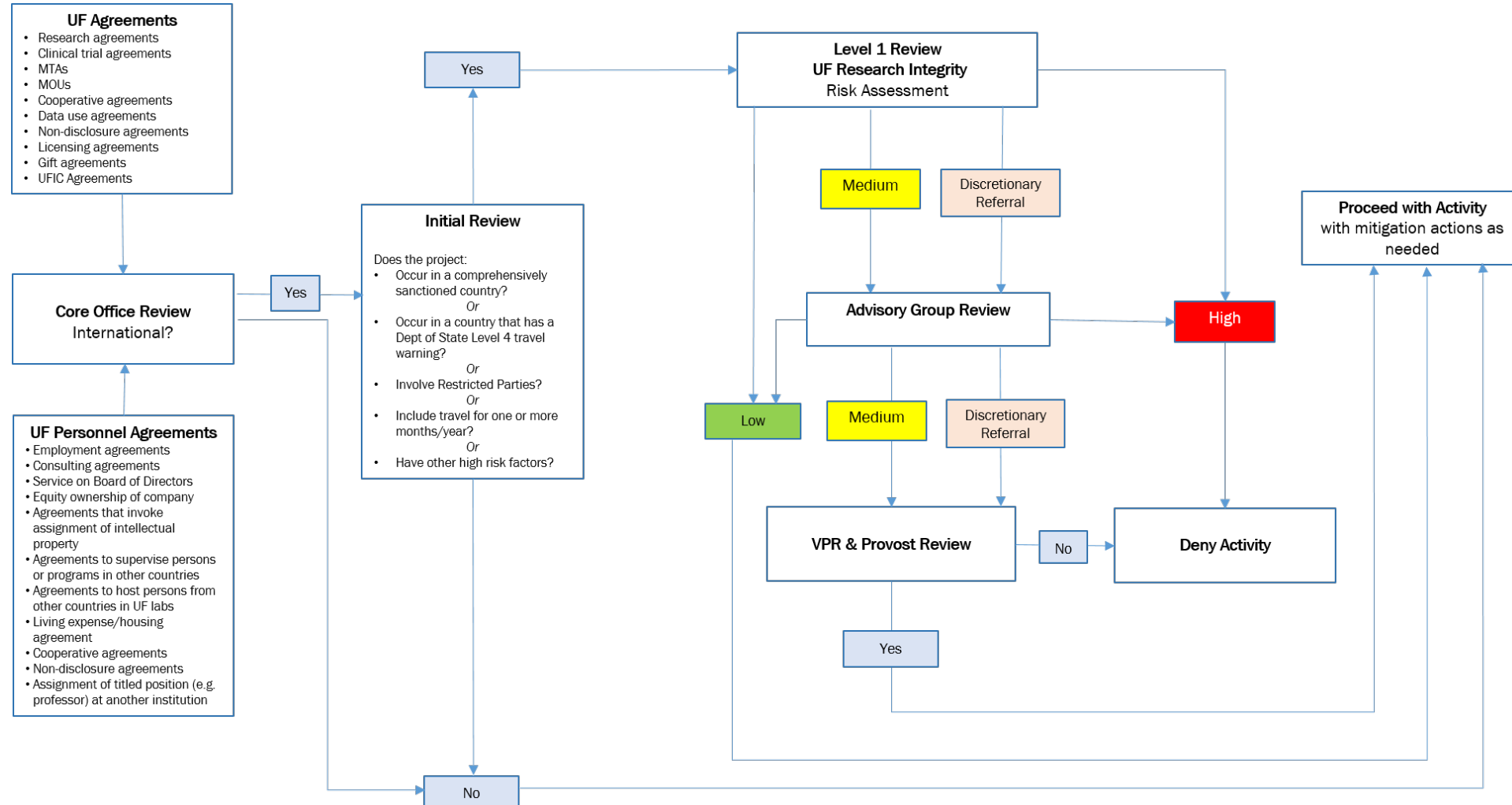
# UFOLIO Disclosure Review Process



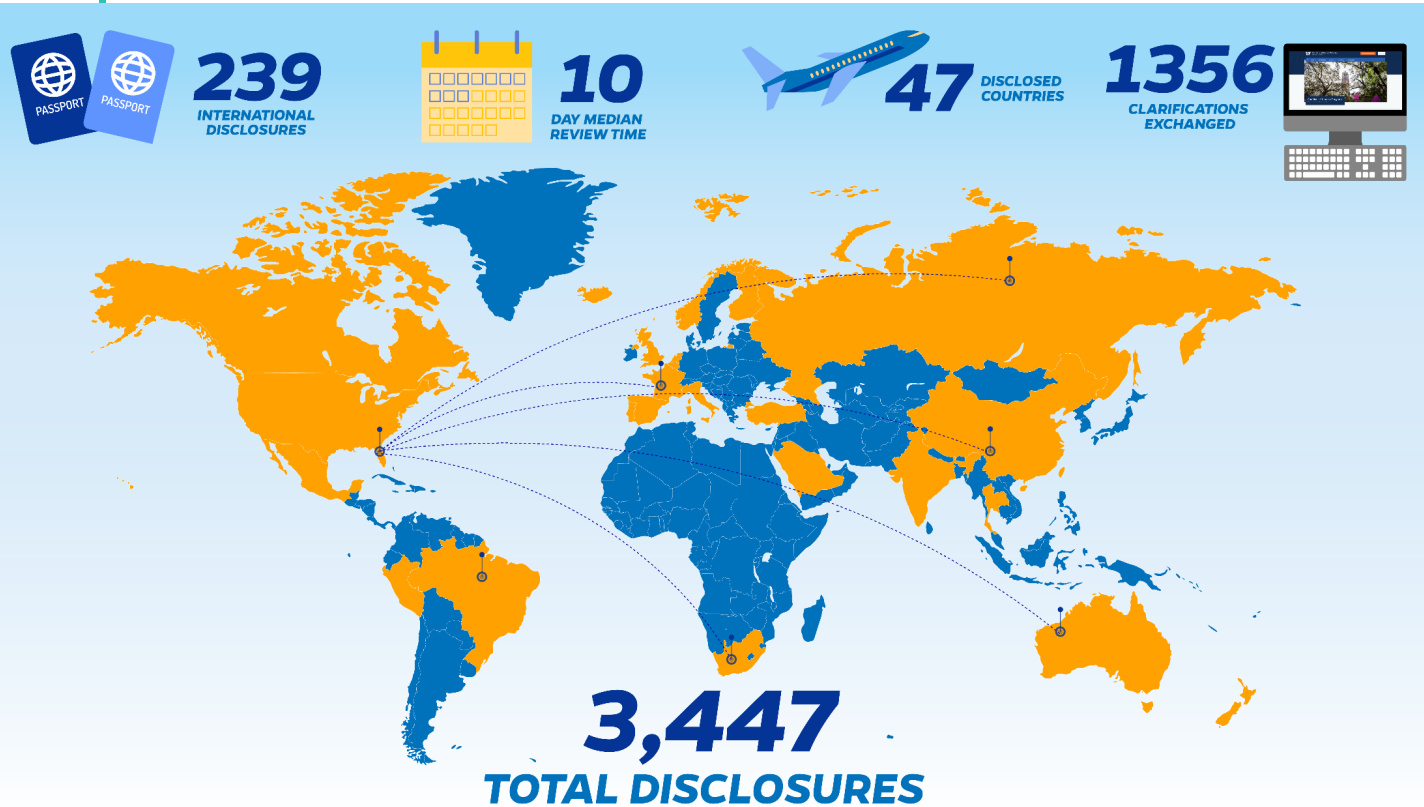
## Important aspects of UF system

- New UF Office for Conflict of Interest (<https://coi.ufl.edu/>)
  - Reports to UF Provost
  - Led by Assistant Vice President for COI
- New online outside activity submission and approval system (UFOLIO)
  - Replaced outdated paper forms and routing processes
  - Intuitive platform for disclosures of outside activities
  - Required at least annually for all UF employees
- Approval required for any proposed outside activity within professional area of individual
- Review and approval of outside activities are done centrally
- Ancillary reviews of UF agreements and faculty outside activity requests that involve international entity

# UF International Risk Assessment Process



- UF agreements and faculty outside activity requests that involve an international entity undergo an International Risk Assessment Process

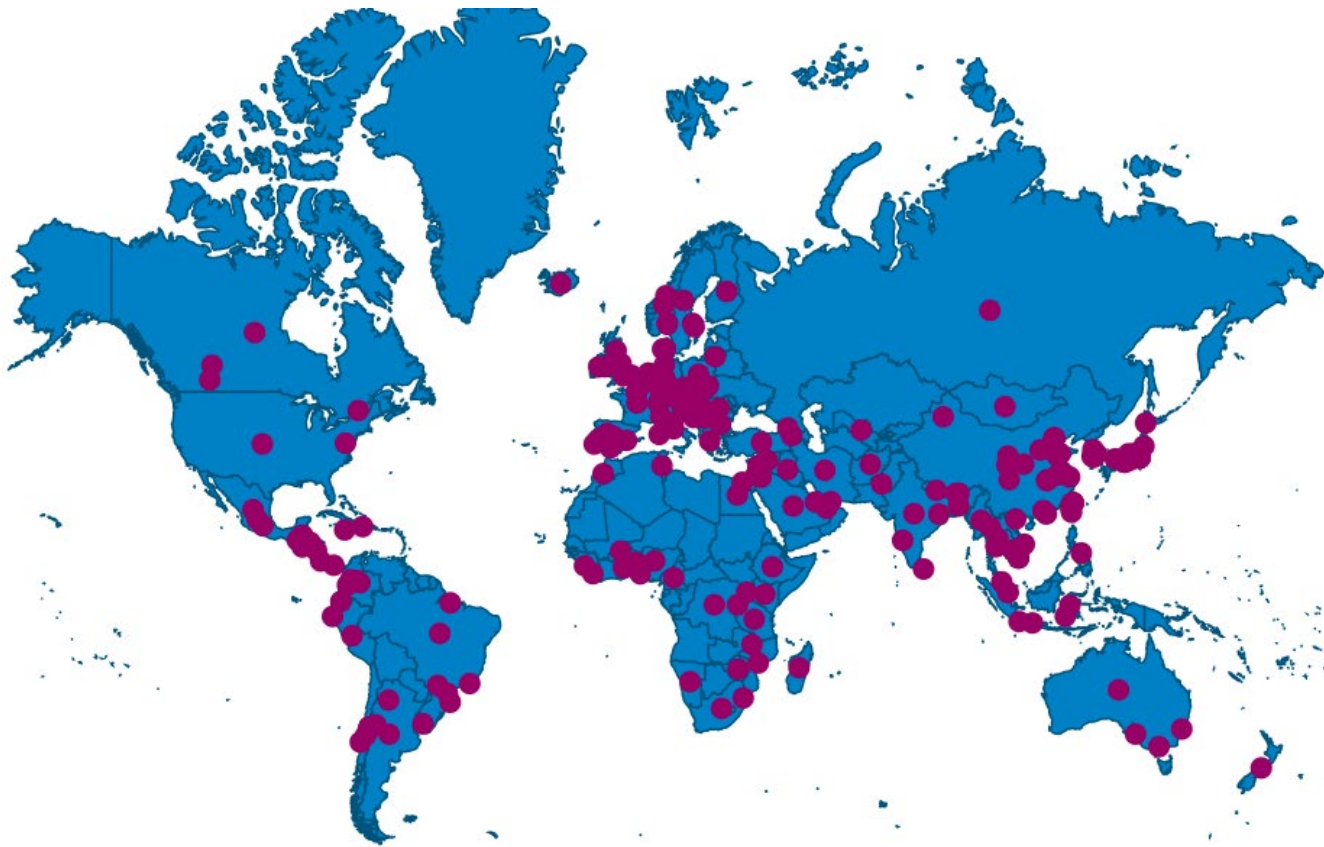


## UFOLIO Disclosure Program

- Key components to current UF outside activity policy and practice
  - Defines expectations for full time professional employees
    - Secondary professional employment/contracting outside activities that conflicts with UF commitment and responsibilities likely denied
  - Alignment of outside activity policy with university and state ethics regulations.
  - Robust internal partnership between Office of Research, General Counsel, Office of Conflict of Interest, and Chief Compliance Office
  - Proactive outreach and partnership with external stakeholders within federal and state agencies

# FOREIGN INFLUENCE IN CONTEXT

## University of California at Davis



- Significant global activities
- \$850M in research awards
- Over 4,500 international students
- International Faculty
- Research Collaborations
- Faculty and Student Exchange
- Foreign visitors
- Shipping
- Travel (pre-covid19)
- Confucius Institute
- 8 professional schools/colleges
- 3,900+ annual COI disclosures

# Website Information:

<https://research.ucdavis.edu/policiescompliance/international-relationships-and-activities/>



Faculty Toolkit ▼



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## In This Section

[Policies & Regulations](#)

[Animal Care Program](#)

[IRB Administration](#)

[Biological Safety](#)

[Export Controls in Research](#)

[Human Anatomical Specimen  
& Tissue Oversight](#)

[Research Ethics: RCR Program](#)

[Research Misconduct](#)

[Stem Cell Research](#)

[International Relationships  
and Activities](#)

## International Relationships and Activities

The following guidance has been prepared by the Office of Research to ensure that research and educational activities at UC Davis are compliant with federal regulation, state law, university policy, and research sponsor requirements – specifically relating to disclosing foreign relationships and activities. It is intended to supplement [guidance from the University of California Office of the President](#) (UCOP).

- [UCOP Resources Regarding Foreign Influence](#)

### Background on Increased Federal Scrutiny

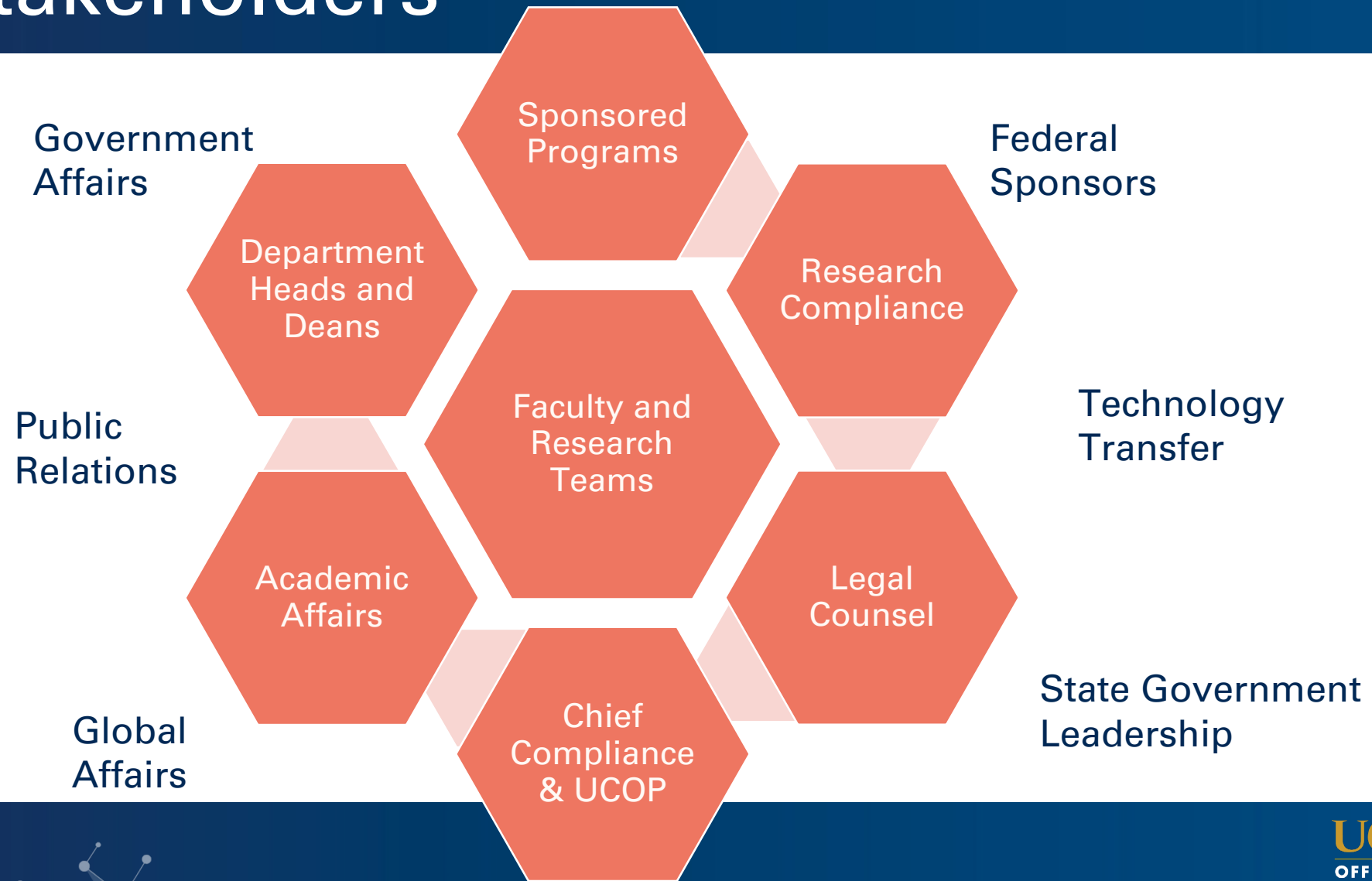
UC Davis remains committed to continuing and building important and successful relationships and collaborations with our foreign colleagues and Institutions. However, recently, the U.S. government has identified threats to our national security in the form of intellectual property diversion by foreign actors. Specifically, the academic freedom and open exchange of ideas that is essential to the mission of the university also creates a unique set of risks. To that end, it is important that all UC Davis personnel protect the integrity of our resources through consistent disclosure and reporting of international research, scholarly, and outside activities through all appropriate channels.

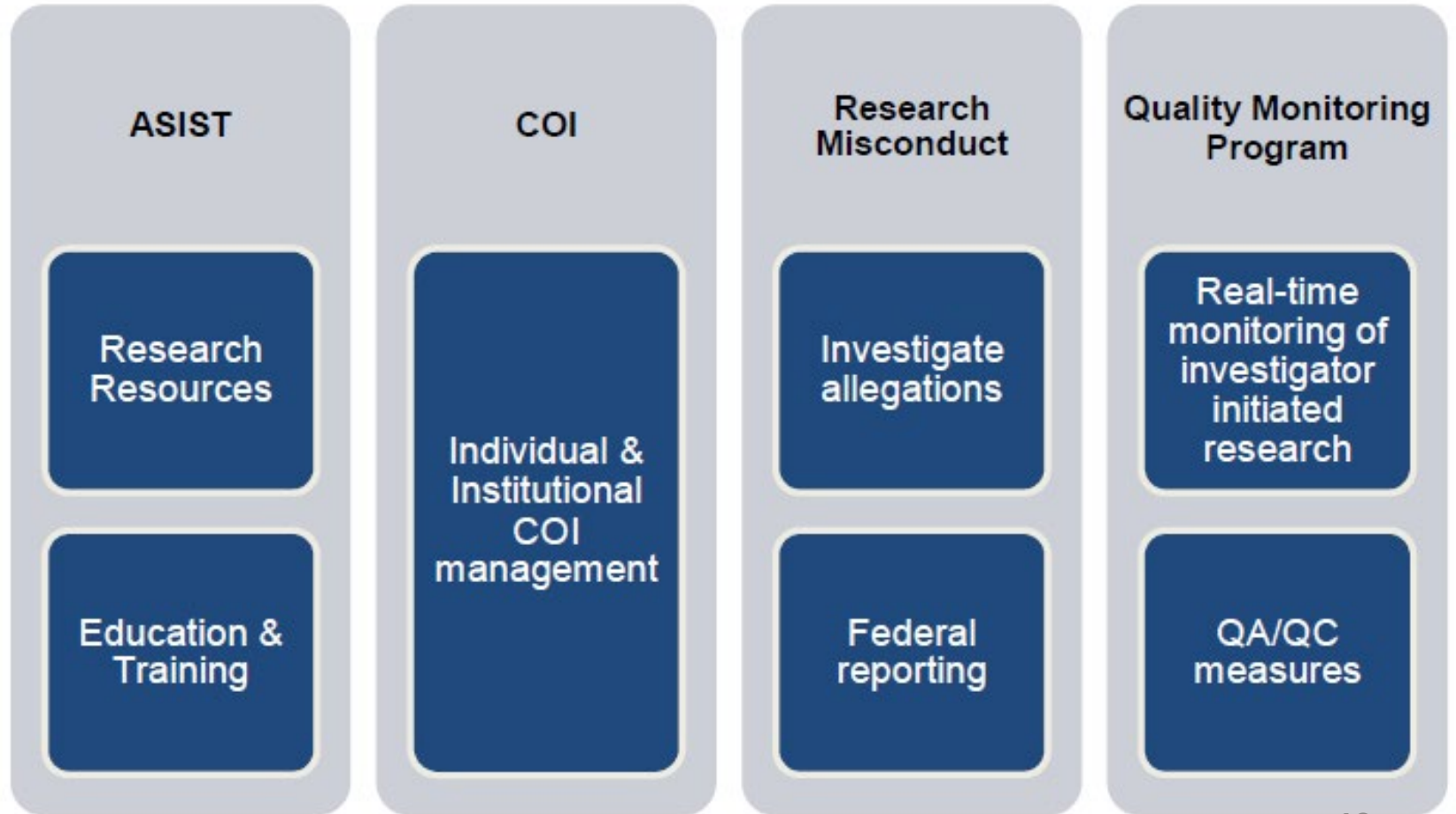


# Education, Communication and Mitigation Efforts

- Research Expo Workshops
- Faculty senate list-serve emails
- One-on-one conversations
- FBI information sessions
- Monthly townhalls
- Newsletters
- Modified proposal routing certifications
- Coordination with Academic Affairs for conflict of commitment and conflict of interest reporting knowledge (Changes to sabbatical leave forms)
- Escalation procedure with campus counsel and chief compliance office (and UC System)
- COI reporting post-submission monitoring

# Foreign Influence Team Members and Stakeholders





## COMMUNICATION & INTEGRATION

- Trainings, town hall presentations and memos to faculty & research administrators
- Revised conflict of interest (COI) form to incorporate conflict of commitment (COC)
- New foreign activities questionnaire to faculty to help establish baseline
- Pilot system to track visiting scholars
- *New questions in electronic proposal system to provide details on foreign activities*
- *New system to combine data sources for Other Support, Current & Pending Support*

## \* Foreign Justification



### Foreign Activities Detail

#### Does Project Involve:

- \* Use of human subjects at a foreign site?
- \* Use of vertebrate animals at a foreign site?
- \* Foreign travel for the purpose of data collection, surveying, sampling or similar activities?
- \* Use of facilities or instrumentation at a foreign site?
- \* Receipt of any financial support or resources from a foreign entity specific to this project?
- \* Any activities that may have an impact on U.S. foreign policy, either through involvement in the affairs of or the environment of a foreign country?
- \* Collaborations with investigators at a foreign site that are anticipated to result in co-authorship?
  - \* Does any of the work leading up to co-authorship take place outside of the U.S.?





Obstetrics/Gynecology

### ACTIVE AWARDS

PI / Co-PI / FELLOW	15
SENIOR / KEY PERSONNEL	0
OTHER PROJECT ROLES Mentor, Co-Investigator, Etc.	0
ROLE UNKNOWN	1

### ADDITIONAL ACTIVITIES

OTHER FUNDS	2
OTHER EFFORT	4

[VIEW CURRENT EFFORT](#)

### NON-COMPETING RENEWALS

IN PROCESS	1
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### PROPOSALS & COMPETING RENEWALS

IN PROCESS	6
SUBMITTED	10

[START PROPOSAL PROCESS](#)

### COMPLIANCE

#### COI



[Annual Disclosure](#)  
Complete 4/27/2020

#### Training



[PI Financial Compliance](#)  
Expires 12/8/2021

### ACTIVE AWARDS

#### PI / CO-PI / FELLOW

#### Endometrial Cancer Molecularly Targeted Therapy Consortium

Budget Period 7/1/2019 - 6/30/2020  
Project Period 7/1/2019 - 7/1/2023

PI	
SAP CURR. COST DIST	6%
SES EFFORT	Cal: 0.48

[SUBMIT A REQUEST](#)

[VIEW DETAILS](#)

WBSE 2930203 - SPS [201727](#)

#### A Phase 2 Randomized Double-Blind Trial of Maintenance with Niraparib vs Placebo

Budget Period 11/1/2013 - 1/31/2021  
Project Period 11/1/2013 - 1/31/2021

PI	
SAP CURR. COST DIST	1%
SES EFFORT	Cal: 0.12 *

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# University of Chicago

- Institutional-wide Coordination
- Policy Clarifications
- Operational Changes
- Training and Communication



# University of Chicago

- Conflict of Interest Policy Updates
- Added FTE to the COI Team
- RPPR/JIT/COI coordinated Review
- New Faculty Leave Approval Process
- International Collaboration Web content
- Faculty Forums & Seminars
- Research Administration Training