

UAMS values the international collaboration and the contributions of our colleagues around the world. However, it is vitally important that UAMS researchers be fully transparent about all of their collaborations, relationships, and activities, whether foreign or domestic.

The U.S. Government continues to express growing concerns regarding the influence of foreign governments and entities over federally funded research. In particular, the federal government is focused on the failure or alleged failure of some federally funded researchers to adequately disclose their relationships with foreign entities. ***Such failure to properly disclose may jeopardize a researcher's eligibility or that of his or her institution to obtain future funding.***

Another issue that is garnering a great deal of scrutiny by the federal government is participation in **foreign talent programs**.

In line with the federal agencies, UAMS is committed to full transparency and disclosure. Not only should investigators disclose participation in a foreign talent program or any other foreign affiliation (paid or unpaid) to federal sponsors, they should discuss any such activity with the Vice Chancellor for Research and Innovation as well as their Dean's Office. An investigator may be advised to terminate his or her affiliation with the foreign talent program.

***Transparent and full disclosure protects the researcher, the collaborators, the federal government, and UAMS.***

#### **Foreign relationships should be disclosed to UAMS:**

- Discuss any invitation for any academic appointment or position at another domestic or international institution (visiting, honorary, or other; paid or unpaid) with the Vice Chancellor for Research and Innovation and with your Dean's Office prior to accepting the appointment.
- Disclose involvement in any foreign recruitment or "talent" programs to the Vice Chancellor for Research and Innovation and your Dean's Office.
- Ensure your Conflict of Interest disclosure in TRACKS is accurate and up to date.
  - Disclosure of support from foreign governments or foreign entities is reportable, even if no compensation from the foreign entity is received (UAMS Admin Guide Policies 4.4.12 and 4.4.13)

#### **Foreign Components and Other Support in federally funded research should be disclosed**

A *Foreign Component* is any significant scientific element or segment of a project outside of the United States. The definition of foreign component includes 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.

*Other Support* includes both financial resources and in-kind support such as lab space, equipment or supplies, which are available in direct support of the research endeavors of an investigator.

**How to disclose foreign components to NIH:**

- Identify a “foreign component” in an NIH grant application
- List a “non-U.S. performance site”
- Identify foreign relationships and activities in a biosketch
- Check “yes” to the question on the Cover Page Supplement Form asking, “Does this project involve activities outside of the United States or partnerships with international collaborators?”

**How to disclose Other Support to NIH:**

- List all resources available in direct support of the research endeavors on the Other Support or Current and Pending Support forms, whether those resources are domestic or foreign, cash or in-kind.

Remember resources should be disclosed even if they relate to work that is performed outside of a researcher’s appointment period. For example, if a researcher with a nine-month appointment spends two months at a university outside of the U.S. during the summer conducting research under a foreign award, that activity should be disclosed.

Most other federal sponsors will have their own guidance on how to disclose Foreign Components and Other Support. Please consult with the Office of Research and Sponsored Programs (ORSP) if you have questions.

Please remember, it is ultimately the responsibility of the individual researcher to ensure that the report of Other Support is complete and accurate to the best of his or her knowledge. PIs should review all pending proposals and active awards to ensure that all Foreign Components and Other Support have been disclosed. If a PI identifies an omission or error in a previously submitted proposal, the PI should contact ORSP to correct the error or omission.

**For more information, please contact:**

Dr. Shuk-Mei Ho, Vice Chancellor for Research and Innovation  
[shukmeiho@uams.edu](mailto:shukmeiho@uams.edu)  
501-686-5347

Carrie Chiaro, Research Compliance Audit Manager, Office of Research  
Compliance  
[Carrie@uams.edu](mailto:Carrie@uams.edu)  
501-526-6270

Westley Ashley, Director, International Compliance & Conflict of Interest  
[WLAshley@uams.edu](mailto:WLAshley@uams.edu)  
501-686-6447

## **Information and Resources**

### **NIH's Actions**

- In March 2018, National Institutes of Health (NIH) issued a notice reminding research institutions that Principal Investigators (PIs), sub-awardees, and co-PIs must disclose all foreign financial interests.
- In August 2018, Francis Collins, NIH's Director, issued a directive to all researchers to "disclose all forms of other support and financial interests, including support coming from foreign governments or other foreign entities...[on] all applications and progress reports." (See: "NIH Foreign Influence Letter to Grantees"). The August 2018 "Dear Colleagues" letter also reiterated that the disclosures must include "relevant affiliations."
- In July 2019, NIH issued, "Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components," reiterating expectations for disclosure of other support, foreign components, and financial conflicts of interest. (See [NOT-OD-19-114](#); NIH Other Support [FAQs](#)).

### **DoD's Actions**

- On March 20, 2019, Dr. Michael D. Griffin, the Under Secretary of Defense for Research and Engineering, issued a memorandum directing all Department of Defense (DoD) Grants Managers and other personnel supporting the award and administration of funding for research and research-related educational activities to require key personnel on DoD-funded projects report broad disclosures about other research and support.
- On October 10, 2019, Dr. Michael D. Griffin issued a letter to DoD funded institutions <https://research.uams.edu/wp-content/uploads/sites/40/2019/10/DoD-letter-to-Universities10102019.pdf> stating "I expect your support to ensure your faculty meets these new reporting requirements. We will use this information to limit undue influence by countries that desire to exploit DoD research, science and technology, and innovation enterprise through foreign talent programs and other means....Open international collaborations are important to DoD and the Nation, and we must also protect against those who seek to exploit this openness."

## NSF's Actions

- The National Science Foundation issued a statement in October 2018 reminding US universities of the need to transparently and rigorously adhere to conflict of interest and commitment policies.
- On July 11, 2019, NSF Director Dr. France Cordova issued a Dear Colleague Letter which outlined NSF's disclosure expectations for current and pending support. The letter also announced a commission by independent advisory group JASON to further study the issues related to science and security, and issued a policy that NSF personnel and IPAs detailed to NSF cannot participate in foreign government talent recruitment programs.
- On December 11, 2019, NSF released a report titled "Fundamental Research Security" by the independent advisory group JASON  
([https://www.nsf.gov/news/special\\_reports/jasonsecurity/JSR-19-21FundamentalResearchSecurity\\_12062019FINAL.pdf](https://www.nsf.gov/news/special_reports/jasonsecurity/JSR-19-21FundamentalResearchSecurity_12062019FINAL.pdf))