Academic Integrity and Undue Foreign Influence

UNCG values, supports and encourages international collaborations and educational opportunities for our campus community when these activities promote the advancement of the common body of knowledge, support academic freedom, and advance scientific research across the globe. UNCG recognizes that while such activities are encouraged, we must also remain vigilant to current and emerging threats to the security of our research endeavors.

Concerns about systematic programs of foreign interference at U.S. research universities are being expressed by federal agencies that support research, federal intelligence agencies, federal security agencies, as well as Members of Congress. These agencies are concerned with preventing foreign actors from acquiring or duplicating US federally funded research. For example, both NIH and NSF have issued “Dear Colleague” letters expressing concerns regarding foreign threats to academic research activities, and the DOE issued a memo in December 2018 announcing plans to restrict “international scientific research collaborations that may pose potential risk to U.S. national interests.” These agencies are taking this very seriously; the DOJ is pursuing those who fail to disclose conflicts of commitment or interest.

Professional organizations have raised similar concerns. The Association of Public Land Grant Universities (APLU) and the Association of American Universities (AAU) have put forward their APLU-AAU Effective Practices Summary for potential policies, procedures, and tools to help academic institutions address these risks.

Below are some ways in which you can help ensure our research activities are protected:

Disclosure

Making full and transparent disclosures of foreign relationships and activities consistent with established university expectations and existing practices will help ensure that international collaborations and other global engagement activities are in full compliance with applicable federal and university regulatory requirements.

- Disclose collaborations with foreign or domestic entities in compliance with sponsor requirements in your proposals and reporting. These collaborations may include exchanges of personnel, materials, or data, or other significant activity likely to result in co-authorship.
- When you apply for research funding, disclose all ongoing or proposed research projects and sources of support, per instructions in NIH’s Other Support, NSF’s Current and Pending Support, and similar documentation from other sponsors.
- Disclose financial interests related to your research in all public sharing of your research results - presentations, publications or otherwise.
- Disclose your outside professional activities and financial relationships through the External Professional Activities for Pay (EPAP) and Conflict of Interest (COI) systems. Such disclosures must include all work for, or financial interests received from a foreign institution of higher education or the government or quasi-governmental organization of another country.

For questions or additional information see https://exportcontrol.uncg.edu/ or contact Dr. Lisa Goble, Director of the Office of Research Integrity at lagoble@uncg.edu or 336-256-1173
Export Control

- When collaborating with international partners, making financial transactions, shipping materials, transferring technology, traveling abroad, or using restricted materials for research, comply with all US export control regulations.

Foreign Travel

- Agencies and other entities that fund your work may require advance approval and/or disclosure of foreign travel or domestic travel sponsored by foreign entities. Check the requirements associated with your specific funding sources.
- When traveling to high risk countries, follow recommendations including the use of clean loaner devices to protect information.

Intellectual Property

- Disclose to UNCG all potentially patentable inventions conceived or first reduced to practice in whole or in part in the course of your University responsibilities or with more than incidental use of University resources. Remind your group members and collaborators to do the same.

Peer Review

- Never share information obtained while going through a peer review processes, whether reviewing grant applications or publications. This information is confidential.
- Declare all competing or conflicting interests when agreeing to serve as a reviewer.
- Check the requirements of the relevant agency or journal. If in doubt, disclose or ask.

Additional links/resources:

FBI recently updated guidance document “China – The Risk to Academia.”

NIH Other Support and Foreign Components FAQ, August 6, 2019

NIH, Office of the Director, Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components (NOT-OD-19-114) - July 10, 2019

DoE issued a directive regarding foreign influence and talent recruitment programs, June 7, 2019,

Foreign Influence on Research Integrity - 117th Meeting of the Advisory Committee to the Director of the NIH, December 13, 2108

Dr. Francis Collins, Director of the National Institutes of Health (NIH), issued a “Foreign Influence Letter to Grantees”, August 20, 2018

The FY19 National Defense Authorization Act includes a provision alluding to the restriction of federal funding to institutions doing business with certain Chinese telecommunications companies - August 13, 2018

NIH Notice NOT-OD-18-160 Financial Conflict of Interest: Investigator Disclosures of Foreign Financial Interests - March 30, 2018

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