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Foreign Influence

Office of Ethics, Compliance and Audit Services

Presenters:

Alexander A. Bustamante, Senior Vice President, Chief Compliance and Audit Officer

Shanda Hunt, Systemwide Research Compliance Manager

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Overview

1. Whole of Government Approach
2. Rules and Regulations
3. Building a Compliance Plan for Foreign Influence
4. Focus Not Changing Soon

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How We Got Here



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HOW WE GOT HERE



National Institutes of Health (NIH)

NIH is among the largest public funders of biomedical research in the world and the second-largest U.S. research funder

- More than 80% of NIH's \$42 billion FY 2020 budget will go to extramural research
- NIH's funding is awarded through almost 50,000 competitive grants to more than 300,000 researchers at more than 2,500 universities, medical schools, and other research institutes in the U.S. and around the world

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NIH Initiates Inquiries

'THIS IS REAL THEFT'

NIH Investigates Foreign Influence at U.S. Grantee Institutions

BY ERIC BOCK



Dr. Michael Lauer

NIH has identified more than 100 instances of troubling foreign influence on extramural research, including withholding information about funding sources and conflicts of interests and violating the confidentiality of peer review, said Dr. Michael Lauer, NIH Deputy Director for Extramural Research.

"These all represent forms of theft," said Lauer.

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More than Sponsors:

- Department of State
- Department of Commerce
- Department of Education
- Department of Justice
- Department of Homeland Security
- Federal Bureau of Investigation
- National Security Council
- U.S. Congress
- The White House, OSTP

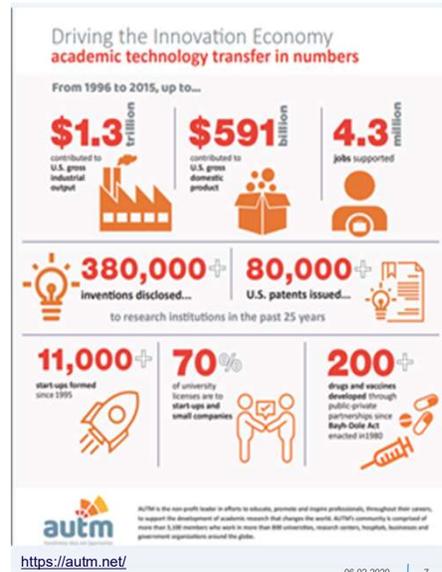


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Bipartisan Support

Higher Ed is Driving Technological Innovation:

- Approximately 1000+ start-up companies launched annually from academic research
- Up to \$1.3 trillion in gross industrial output
- 4.3 million jobs supported



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The Focus Areas

- Failure to disclose other support or affiliations in grant applications
- Inappropriate influence on peer review process on federal grants
- Intellectual property theft
- Cyber vulnerabilities related to research activity
- Concerns with foreign delegations
- Relationships with certain foreign companies
- Influence campaign on students, research, and decisions
- Export control

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Agency Regulations



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AGENCY REGULATIONS

Federal Funding and Regulatory Agencies



National Institute of Health (NIH)
Other Support
Foreign Component



National Science Foundation (NSF)
Current and Pending



Department of Education
Higher Education Act, §117



Department of Health and Human Services
Financial Conflicts of Interest



Department of Energy
DOE Order 142.3A

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Other Support



NIH DISCLOSURE Requirements *Grants Policy Statement, Section 2.5.1;*
NOT-OD-19-114 (July 10, 2019)

What to Disclose

All resources available in direct support of an individual's research endeavors.
 Includes (but not limited to):

- All foreign and domestic entities
- Financial support for laboratory personnel
- Provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.)

When to Disclose

- Before the award (Just-in-Time)
- Annually in RPPR (Research Performance Progress Report)

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Foreign Component



NIH DISCLOSURE Requirements *Grants Policy Statement, Section 8.1.2;*
NOT-OD-19-114 (July 10, 2019)

What to Disclose

Any "significant scientific element or segment of a project" outside of the United States:

- Performance of work by a researcher or recipient in a foreign location
- Performance of work by a researcher in a foreign location employed or paid for by a foreign organization

When to Disclose

- Initial grant application
- Progress Reports
- Prior approval is always required!

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Current and Pending Support



NSF DISCLOSURE Requirements, *Proposal and Award Policies and Procedures Guide (PAPPG) (NSF 20-1) Effective Date June 1, 2020*

What to Disclose

ALL resources made available to an individual in support of and/or related to

ALL of his/her research efforts, regardless of whether or not they have monetary value.

IN-KIND contributions (such as office/laboratory space, equipment, supplies, employees, students).

When to Disclose

- Initial grant application
- Ongoing whenever new support is acquired
- Annual Progress Report

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Conflict of Interest



NSF Financial Conflict of Interest Policy Disclosure Requirements

Who must disclose?

Investigators (anyone, regardless of title or position, responsible for design, conduct or reporting of research funded by NSF)

What must be disclosed?

Significant Financial Interests of Investigator (including spouse, registered domestic partner, and dependent children) that would reasonably appear to be affected by the research or that are in entities whose financial interests would reasonably appear to be affected by the research.

When is disclosure required?

- Before a proposal is submitted
- When a new investigator joins the project
- When new reportable SFI is acquired

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Conflict of Interest



PHS Financial Conflict of Interest Policy, 42 CFR 50, Subpart F
(FCOI) Disclosure Requirements

Who must disclose?

Investigators (anyone, regardless of title or position, responsible for design, conduct or reporting of research funded by PHS)

What must be disclosed?

Significant Financial Interests (SFI) of the Investigator (including spouse and dependent children) related to Investigator's institutional responsibilities.

Professional responsibilities on behalf of the institution, including teaching, research, outreach, clinical service, and other activities in the course and scope of institution appointment/employment.

When is disclosure required?

- Before a proposal is submitted
- When a new investigator joins the project
- Within 30-days of acquiring a new SFI
- Before submission of progress reports
- Minimally, annually during life of the grant

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Foreign Gifts and Contracting



Higher Education Act, Section 117

Who must disclose?

Generally, all domestic higher education institutions that receive any Federal financial assistance (directly or indirectly).

What must be disclosed?

Any contracts and gifts received from any foreign source exceeding, in the aggregate, \$250,000 in any calendar year and

Any ownership interests in or control over the institution by a foreign entity.

In February 2019 a [bipartisan report](#) of the United States Senate Permanent Subcommittee on Investigations found that one foreign entity directly provided over \$158 million to U.S. colleges and universities since 2006 and that 70% of the recipient schools failed to report such funding as required by existing federal law and regulation.

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Foreign National Access



DOE Order 142.3A

Who must disclose?

Department of Energy locations, such as national laboratories.

What must be disclosed?

Prior DOE approval of Foreign Nationals (including Permanent Residents) for access to DOE sites

- Includes any person who is not a U.S. citizen by birth or naturalization.
- Includes foreign national access to DOE sites, information, technologies, equipment, programs or personnel.

NOTE: In December 2019, DOE **removed** the exemption for higher education institutions performing fundamental research.

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UC Compliance Plan

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Tone from the Top

February 7, 2019

As you are aware, federal agencies and policymakers have expressed concern that foreign entities may be using the academic research enterprise in an attempt to compromise our country's economic competitiveness and national security. The reality is that bad actors and some foreign governments from around the world are making concerted efforts to steal intellectual property and infiltrate systems. **Our University community must address national security concerns while protecting the principles of academic freedom.** We must protect the intellectual capital which creates jobs, new ideas, and innovation while enabling our faculty, staff, and students of all nationalities to pursue research, discuss ideas freely, and publish research results without regard to citizenship restrictions. Our teaching and research excellence make us a global leader in creating new knowledge and the destination of choice for many of the world's best scholars and students. We value their important contributions to UC's research leadership, to California's and the nation's prosperity, and to global scholarly excellence.

It is critically important to me that the entire UC community demonstrate leadership not only in research, but also in our responsibility and accountability through compliance, trainings, risk assessments, and protocols for investigations with a clear understanding of what is at stake. **UC is committed to helping our faculty, staff, and students have the greatest global impact possible while educating our community about protecting the integrity of our research. This is not an "either or" proposition - it's both.**



Janet Napolitano
President

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Compliance Plan

- Training and Awareness Program
- Research Compliance Assessments to Identify Gaps
- Inventory of Certain Technology, Contracts, and Donations
- Audits of Research Grant Disclosures and Relationships with Denied Entities
- Research Cyber Vulnerability Assessments and Penetration Testing
- Standardized Investigations
- Strengthen export Control Processes throughout System



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Training and Awareness

ECAS performed extensive federal outreach regarding Foreign Influence.

- Demonstrate understanding of the issues
- Develop strategic partnerships
- Protect UC's interests

ECAS created internal awareness with senior leadership, academics and staff, including confidential and classified briefings around government concerns to ensure:

- Bipartisan nature of the USG's concerns
- The seriousness of individual cases
- ECAS country agnostic approach

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Training and Awareness Program

Foreign Influence Website – a comprehensive site pulling together policies, communications, regulatory changes, criminal indictments, etc. updated weekly.

The screenshot shows the website for the University of California's Office of the President, specifically the 'Ethics, Compliance and Audit Services' section. The page is titled 'Foreign Influence' and contains a list of links for further information. The links are numbered 1 through 4, with the second link having sub-links a through p. The sub-links include various federal agencies and organizations such as NIH, NSF, DOE, DOD, NASA, and the Department of Education.

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Foreign Influence Infographics

ECAS will continue to design and distribute a suite of infographics on the topics of Foreign Component, Other Support, Affiliations, Conflict of Interest, Conflict of Commitment and Export Control.

ETHICS COMPLIANCE AND AUDIT SERVICES

Current and Pending Disclosure Requirements for National Science Foundation Grants

What You Need to Know

- What needs to be disclosed?**
 - Information must be provided for all current and pending support, irrespective of whether such support is provided through the proposing organization or directly to the individual.
- Where must you disclose?**
 - Submit Current and Pending Support with your grant application and with progress reports.
 - New electronic format for forms will be implemented to collect current and pending.
- Is this a new NSF policy or a clarification?**
 - NSF does not consider these clarifications to be changes in policy.
 - Immediate compliance with the policy clarification is expected.

ETHICS COMPLIANCE AND AUDIT SERVICES

FOREIGN COMPONENT

NIH DEFINES A FOREIGN COMPONENT AS:

- performance of work by a researcher or recipient in a foreign location, whether or not that grant funds are expended and/or
- performance of work by a researcher in a foreign location provided or paid for by a foreign organization, whether or not that grant funds are expended.

WHAT ARE SOME EXAMPLES OF A "SIGNIFICANT ELEMENT OF A PROJECT"?

- collaborations with investigators at a foreign site anticipated to result in co-authoring
- use of facilities or instrumentation at a foreign site
- receipt of financial support or resources from a foreign entity

PRIOR APPROVAL IS REQUIRED

Initial Disclosure: You must disclose in your grant proposal all foreign components.

Disposing Grants: If you want to add a foreign component to an existing NIH grant, you must seek prior approval from NIH.

- Do not allow the performance of work by a researcher or recipient at a foreign institution (FCI) site until you seek and receive prior approval from NIH.

OTHER SUPPORT

WHAT DOES OTHER SUPPORT INCLUDE?

resources made available to a researcher in support of and/or related to all of their research endeavors, regardless of whether they are based at the institution the researcher identifies for the current grant.

WHAT ARE SOME EXAMPLES OF OTHER SUPPORT?

include similar financial support from all foreign and domestic sources, including but not limited to:

- financial support for laboratory personnel
- provision of high-value materials that are not freely available (e.g., biological materials, model systems, technology, etc.)

NIH APPLICANTS MUST REPORT:

foreign and domestic governmental, domestic and foreign, held by primary personnel that are relevant to an application including affiliations with foreign entities or governments.

resources and other support for all individuals designated in an application as significant personnel.

A project and activities that involve primary personnel, even if support provided to only a subset of the designated personnel, requires reporting, including:

- foreign resources including foreign financial support, research or personnel fee awards, academic material, instruction or foreign or similar-type programs, or other foreign or domestic support that is reported.

ADDED INFORMATION ON YOUR DISCLOSURE RESPONSIBILITIES. SEE: UNIVERSITY OF CALIFORNIA POLICIES ON OTHER SUPPORT AND ON FINANCES RELATED TO RESEARCH PROJECTS AND PERSONAL EXPENSES.

REFERENCES: NIH Grants and Reporting for Other Supporting Organizations (https://www.nih.gov/grants/other-supporting-organizations)

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Ethics and Compliance Briefing for Researchers

- A mandatory online training module for all UC researchers receiving research funding
- Extensive focus on foreign influences on research integrity
- Content will cover disclosure requirements for federally funded research, export control, and UC policies on conflict of commitment and conflict of interest

Ethics and Compliance Briefing for Researchers

Online Mandatory Training

Faculty member Dr. Lewis is worried that he did not disclose all of his foreign affiliations in his recent NSF grant. He asks Dean Smith what he should do. Dean Smith advises Dr. Lewis to contact the Sponsored Projects Office to file a corrected Current and Pending disclosure with NSF.

Dean | Faculty member

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Export Control Compliance Program



Partnership with IT Security and Risk Services to create international travel program:

- Physical Safety and Health
- Research Protection through Device Security (e.g., clean laptops and phones)
- Export Control Briefings

Leveraging automated travel insurance system

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Systemwide Foreign Influence Audits

UNIVERSITY OF CALIFORNIA
Office of Ethics, Compliance and Audit Services

Information Sheet: Systemwide Foreign Influence Audit

In accordance with the FY 2019-20 Internal Audit Plan approved by the Board of Regents, the Office of Ethics, Compliance and Audit Services will be performing a systemwide audit of foreign influence in coordination with the campus internal audit departments. This audit was identified as a key component of the University's systemwide compliance plan for foreign influence.

PURPOSE:
The purpose of the audit is to evaluate the system of internal controls in place to manage risks identified by the federal government related to foreign influence.

SCOPE:
The scope of the audit includes activities in the following areas relevant to foreign influence risk:

• Conflicts of interest	• International activities
• Conflicts of commitment	• Academic departments and faculty
• Export controls	• Intellectual property security and control
• Sponsored programs/grant processing	• Training
• Development and alumni relations	• Policy
• Visas for international scholars and student/graduate studies	

APPROACH:
Most of the audit work will involve interviews with relevant campus personnel to gain an understanding of processes, controls and monitoring mechanisms in place to mitigate risks associated with foreign influence, including processes in place to identify and respond to noncompliance with required disclosures related to conflicts of interest, conflicts of commitment, and other support, including:

- Training and awareness programs
- How positive disclosures are handled/managed
- Monitoring and/or reconciliation of disclosure information
- Third party screening
- Escalation procedures when discrepancies or other concerns are identified
- Record keeping procedures
- Mechanisms to secure pre-publication data and research space

Grant Sample Testing

Audit sample of grants in emerging technologies as identified in the list of "Representative Technology Categories" in the Bureau of Industry and Security 11.19.2018 Proposed Rule and compare information in grant documents with publications to evaluate the accuracy of other support and affiliation reporting.

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Cyber Audits

- Cybersecurity Audit Team - Addressing foreign influence through internal audit
 - Threat Detection and Information (TDI) – Audit to ensure the TDI implementation is covering high risk research areas, and identify opportunities for improving the system to detect and respond to nation state attacks.
 - Penetration Testing – Audits focused on identifying weaknesses in high risk research systems using similar techniques as attackers to fix issues proactively.

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The Need to Properly Investigate

U.S. Attorneys » Western District of Michigan » News

Department of Justice
U.S. Attorney's Office
Western District of Michigan

SHARE ↗

FOR IMMEDIATE RELEASE

Thursday, December 19, 2019

Department Of Justice Reaches \$5.5 Million Settlement With Van Andel Research Institute To Resolve Allegations Of Undisclosed Chinese Grants To Two Researchers

WASHINGTON – The Department of Justice announced today that Van Andel Research Institute (VARI) has agreed to pay \$5,500,000.00 to resolve allegations that it violated the False Claims Act by submitting federal grant applications and progress reports to the National Institutes of Health (NIH) in which VARI failed to disclose Chinese government grants that funded two VARI researchers. The settlement further resolves allegations that in a Dec. 21, 2018 letter, VARI made certain factual representations to NIH with deliberate ignorance or reckless disregard for the truth regarding the Chinese grants.

“The government alleged that while VARI had institutional policies and procedures in place to address conflicts of interest, VARI **did not take adequate additional steps to investigate** the researchers’ foreign funding sources despite receiving specific information about their Chinese affiliations.”

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Investigate Allegations Thoroughly

- Review with multi-disciplinary team and involve leadership
- Prepare investigation plan
- Seek relevant records
- Interview relevant witnesses
- Document process
- Determine whether disclosure is required

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UC Standardized FI Investigations

- Escalation Protocol
- Office of General Counsel and ECAS involved early
- Document Collection Procedures
- Standardized Questions for Interviews
- Quality Control of Reports and Disclosures

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Document Review

We review internal documents related to the grants in question:

- Internal Disclosure Forms
- Form 700-U's
- Public Health Science COI disclosures (associated with grants and the outside interests noted in the NIH letter)
- Foreign component disclosures
- Personnel record of Principal Investigator
- Grant applications (associated with grants noted in the NIH letter)
- Research Performance Progress Reports (RPPRs)
- Other Support forms
- Travel documentation (for trips outside of the US by the investigators)
- Distribution of Payroll Expense Reports
- Lab staff, especially unpaid "volunteers"

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Document Review

We also review external documents related to the grants in question.

Conduct targeted, multi-lingual media searches for publicly available information:

- Affiliation with foreign and other non U.S.-based university and medical institutions (including consulting)
- Participation in foreign government Talent programs
- Affiliation with commercial entities
- Non-U.S. patents filed based on results of U.S.-funded research
- Foreign grants
- Foreign components in active research and awards
- Publications

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Continued Focus on Foreign Influence



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CONTINUED FOCUS ON FOREIGN INFLUENCE

§117 Enforcement and Scrutiny is Increasing.

◆ WSJ NEWS EXCLUSIVE | POLITICS U.S. Probes University of Texas Links to Chinese Lab Scrutinized Over Coronavirus

Education Department investigation into foreign financial ties also seeks records of school system's dealings with Huawei, Zoom CEO



The Wuhan Institute of Virology has come under scrutiny from U.S. officials who accuse Beijing of withholding information about the origins of the outbreak.
PHOTO: HECTOR RETAMAL/AGENCE FRANCE PRESSE/GETTY IMAGES

By *Kate O'Keefe*
May 1, 2020 5:30 am ET

Nine investigations and records requests :

- Georgetown University (June 13, 2019)
- Texas A&M University (June 13, 2019)
- Cornell University (July 3, 2019)
- The State University of New Jersey ("Rutgers University") (July 3, 2019)
- Massachusetts Institute of Technology (September 26, 2019)
- University of Maryland (September 26, 2019)
- Harvard University (February 11, 2020)
- Yale University (February 11, 2020)
- University of Texas (April 24, 2020)

House Republicans launch probe of Chinese involvement in U.S. higher education

By *Juan Perez Jr.*
05/04/2020 01:20 PM EDT

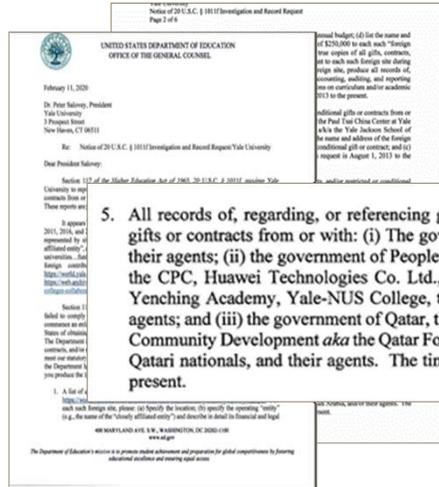
Top House Republicans want the Education Department to turn over records of its investigations into U.S. colleges and universities, as part of a joint inquiry into the Chinese government's involvement in the American higher education system.
"China has strategically invested in U.S. academia to attempt to steal confidential information and technology from U.S. companies, and even the U.S. government,"
Republicans from seven House committees said [today in a letter to Education Secretary Betsy DeVos](#).

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Global Focus



Focus is not only China - recent investigations include requests for information on Singapore, Qatar, Saudi Arabia, and Russia.

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COVID-19 Research



Increased cyberattacks by nation-states seeking COVID-19 research and data-sets.

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Emergent Technology

- Biotechnology
- Artificial Intelligence and Machine Learning
- Position, Navigation & Timing
- Microprocessor
- Advanced computing
- Data analytics
- Quantum information & sensing
- Logistics
- Additive manufacturing (e.g., 3D printing)
- Robotics
- Brain-computer interfaces
- Hypersonics
- Advanced Materials
- Advanced surveillance

Confucius Institutes

NATIONAL ASSOCIATION of SCHOLARS

REPORTS & PROJECTS | OUR WORK | MEMBERS | ACADEMIC QUESTIONS | GET INVOLVED | ABOUT US

Senator Chuck Grassley Issues Stern Warning About Confucius Institutes

Article
March 12, 2020
Confucius Institutes | Transparency

On October 10, Senator Chuck Grassley (R-IA) sent a cautionary letter to the 77 American colleges and universities with an active Confucius Institute (CI), as per Politico's "Steering Education" report.

S.3453 - Transparency for Confucius Institutes

116th Congress (2019-2020) | [Get alerts](#)

BILL Hide Overview X

Sponsor: [Sen. Blackburn, Marsha \[R-TN\]](#) (introduced 03/12/2020)

Committees: [Senate - Health, Education, Labor, and Pensions](#)

Latest Action: [Senate - 03/12/2020 Read twice and referred to the Committee on Health, Education, Labor, and Pensions. \(All Actions\)](#)

Tracker:

[Introduced](#) [Passed Senate](#) [Passed House](#) [To President](#) [Became Law](#)

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Closing Questions

Office of Ethics, Compliance and Audit Services

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Appendix

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NIH DISCLOSURE Requirements *Grants Policy Statement, Section 2.5.1; NOT-OD-19-114 (July 10, 2019)*

OTHER SUPPORT

Applicants must report ALL resources (regardless of whether they have monetary value), whether Federal, non-Federal, commercial, or institutional, available in support of ALL of an individual's research endeavors (regardless of where that research is conducted), including but not limited to research grants, cooperative agreements, contracts, institutional awards, support for lab personnel, provision of high-value materials not freely available (e.g., biologics, chemicals, model systems, technology).

- Applicants must list ALL positions and scientific appointments (domestic and foreign) held by Senior/Key Personnel that are relevant to an application. Includes affiliations with foreign entities or governments; titled academic, professional or institutional appointments, whether paid or unpaid, full- or part-time, or voluntary (including adjunct, visiting and honorary).
- Report ALL resources and other support (domestic and foreign) for all individuals designated in an application as Sr./Key Personnel and for others who contribute to the scientific development or execution of a project in a substantive measureable way (regardless of whether they request salary support/compensation). Info must be provided re ALL current support for ongoing projects, regardless of whether such support is provided thru the applicant organization, thru another organization, or directly to an individual that support's the Sr/Key personnel's research efforts.
- Report ALL current projects/activities involving Sr/Key Personnel, even if support is received only in-kind (e.g., office/lab space; equipment, supplies, employees). All research resources must be reported – includes financial support, research/lab personnel, lab space, scientific materials, includes selection to a foreign "talent" program.
- Provide total award amount for the entire award period covered (including F&A costs), as well as person-months (full or partial) per year to be devoted to the project by the Sr/Key personnel involved.

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NIH DISCLOSURE Requirements *Grants Policy Statement, Section 2.5.1; NOT-OD-19-114 (July 10, 2019)*

FOREIGN COMPONENT

NIH defines a foreign component as the existence of any "significant scientific element or segment of a project" outside of the United States, in other words:

- Performance of work by a researcher or recipient in a foreign location, whether or not NIH grant funds are expended and/or
- Performance of work by a researcher in a foreign location employed or paid for by a foreign organization, whether or not NIH grant funds are expended.

Some examples of a significant scientific element or segment of a project are:

- collaborations with investigators at a foreign site
- anticipated to result in co-authorship
- use of facilities or instrumentation at a foreign site
- receipt of financial support or resources from a foreign entity
- extensive foreign travel
- activities with an impact on U.S. foreign policy

Prior approval is required!

- Initial Disclosure: You must disclose in your grant proposal all foreign components.
- Ongoing Grants: If you want to add a foreign component to an ongoing NIH grant, you must seek prior approval from NIH.
- Do not allow the performance of work by a researcher or recipient at a foreign institution BEFORE you seek and receive prior approval from NIH.

Note: Foreign university appointment and lab on research with no overlap with NIH research would be "other support" but not a "foreign component."

NIH: <https://grants.nih.gov/grants/faq-other-support-foreign-components.htm#B>

NSF DISCLOSURE Requirements, *Proposal and Award Policies and Procedures Guide (PAPPG) (NSF 20-1) Effective Date June 1, 2020*

CURRENT AND PENDING SUPPORT

Current and pending support information must be separately provided through use of an NSF-approved format, for each individual designated as senior personnel on the proposal.

Current and pending support includes **ALL** resources made available to an individual in support of and/or related to **ALL** of his/her research efforts, regardless of whether or not they have monetary value.

Current and pending support also includes in-kind contributions (such as office/laboratory space, equipment, supplies, employees, students). In-kind contributions not intended for use on the project/proposal being proposed also must be reported.

Current and pending support information must be provided for this project, for ongoing projects, and for any proposals currently under consideration from whatever source, irrespective of whether such support is provided through the proposing organization or is provided directly to the individual.

The total award amount for the entire award period covered (including indirect costs) must be provided, as well as the number of person-months (or partial person-months) per year to be devoted to the project by the individual.

Concurrent submission of a proposal to other organizations will not prejudice its review by NSF, if disclosed. If the project (or any part of the project) now being submitted has been funded previously by a source other than NSF, information must be provided regarding the last period of funding.

See NSF FAQs on Current and Pending Support

https://www.nsf.gov/bfa/dias/policy/papp/pappg20_1/faqs_cps20_1.pdf

PHS Financial Conflict of Interest Policy, 42 CFR 50, Subpart F (FCOI) Disclosure Requirements

A financial conflict of interest exists when the institution's designated official(s) reasonably determines that an investigator's significant financial interest could directly and significantly affect the design, conduct, or reporting of the PHS funded research.

WHO MUST DISCLOSE?

Investigators (anyone, regardless of title or position, responsible for design, conduct or reporting of research funded by PHS)

WHAT TRIGGERS DISCLOSURE?

Proposing or receiving grant, cooperative agreement, or contract funding from a PHS agency (e.g., CDC, FDA, HRSA, NIH)

WHAT MUST BE DISCLOSED?

Significant Financial Interests (SFI) of the Investigator (including spouse and dependent children) related to Investigator's institutional responsibilities (professional responsibilities on behalf of the institution, including teaching, research, outreach, clinical service, and other activities in course and scope of institution appointment/employment).

WHEN IS DISCLOSURE REQUIRED?

-Before a proposal is submitted -When a new investigator joins the project
 -Within 30-days of acquiring a new SFI -Before submission of progress reports
 -Minimally, annually during life of the grant

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NSF Financial Conflict of Interest Policy Disclosure Requirements

WHO MUST DISCLOSE?

Investigators (anyone, regardless of title or position, responsible for design, conduct or reporting of research funded by NSF)

WHAT TRIGGERS DISCLOSURE?

Proposing or receiving grant, cooperative agreement, or contract funding from NSF

WHAT MUST BE DISCLOSED?

Significant Financial Interests of Investigator (including spouse, registered domestic partner, and dependent children) that would reasonably appear to be affected by the research or that are in entities whose financial interests would reasonably appear to be affected by the research

WHEN IS DISCLOSURE REQUIRED?

-Before a proposal is submitted
 -When a new investigator joins the project
 -When new reportable SFI is acquired

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