



Dear Faculty,

The Federal Government is actively examining foreign influences on federally funded research. As a PI, you are responsible for promptly disclosing a foreign component when a significant scientific element or segment of the research is conducted outside of the U.S. and/or is supported by a foreign entity. You are also responsible for disclosing other sources of support for your entire research portfolio, even if that support is not through Washington University, or the research is not conducted at WU, or if the research is not related to your U.S. federally funded research.

See below for additional details regarding the Government's concerns and required disclosures.

## Background

Washington University values its international collaborations and we welcome students and scholars from around the world. These global collaborations enrich the University's culture and are critical components to providing the highest quality education, research, and patient care.

Recently, the U.S. Government has raised concerns about foreign threats to the integrity of research at U.S. academic and research institutions. These concerns include:

- Diversion of intellectual property to foreign entities
- Disclosing confidential grant application information by NIH peer reviewers to third parties
- Failure of researchers to disclose research resources and support provided by other organization, including foreign entities

As you may know, the Director of the National Institutes of Health (NIH), Francis Collins, recently issued a "[Foreign Influence Letter to Grantees](#)" that addresses concerns about systematic programs of foreign influence in U.S. research. Dr. Collins reminded the research community to *"disclose all forms of other support and financial interests, including support coming from foreign governments or other foreign entities...in accordance with the NIH Grants Policy Statement, [on] all applications and progress reports,"* and indicated that the NIH will be providing additional information in the future.

Additionally, the FY19 National Defense Authorization Act directs the Department of Defense (DoD) to work with academic institutions to limit the undue influence of foreign talent programs and support protection of intellectual property. It further calls for the DoD to develop regulations in this area and limit or prohibit funding for institutions or individual researchers who violate them. As the NIH and other federal agencies and government officials debate these important topics, we would like to raise awareness of these issues and remind researchers of their reporting obligations.

## Required Disclosures

- Disclose to federal funding agencies all research projects you devote effort to and/or actively participate in - ongoing or proposed - that include any foreign sources of funding in the Current and Pending Support/Other Support of your proposal application or at Just-in-Time. This includes any support of your research activities even if not officially through Washington University.
- Disclose to federal agencies a foreign component when, for example, elements of your research are conducted or rely on resources that exist outside the U.S., this may include collaborators, funded students, research subjects, or facilities and equipment.
- Disclose to the university on your financial disclosure statement all personal remunerations/financial interests, including stipends, living expenses, and travel paid for or reimbursed by a foreign entity (e.g. governments and institutions) in accordance with the [university's disclosure requirements](#).
- Disclose any foreign support of the relevant research and/or collaborations as well as personal financial interests related to your research in all public sharing of research results including journal articles, presentations, and other publications.
- Comply with US export control regulations when doing any of the following: traveling internationally and attending conferences; participating in international collaborations; working with international staff and students; hosting international visitors; shipping or hand carrying materials internationally; or engaging in any international transactions. Refer to the [university's export control website](#), "how tos" for additional information.
- Promptly disclose intellectual property to the Office of Technology Management and remind your group members to do the same.
- Follow the requirements of the [university's global travel policy](#).

Thank you for complying with these requirements to disclose and report so that the University's and your interests are protected.

For questions, contact Joseph Gindhart, Associate Vice Chancellor for Finance and Sponsored Projects ([jgindhart@wustl.edu](mailto:jgindhart@wustl.edu)).

Sincerely,  
Jennifer K. Lodge, PhD  
Vice Chancellor for Research