

DATE: September 5, 2019

TO: Faculty, staff, post-doctoral associates, graduate research assistants

FROM: Jonathan A. Wickert, Senior Vice President and Provost
Sarah M. Nusser, Vice President for Research

RE: International activities and collaborations

As a land grant institution committed to a [welcoming and inclusive environment](#) in all of its forms, Iowa State University supports and encourages international partnerships and collaborations that promote openness and accelerate progress in research and discovery. Such international relationships are an essential aspect of research, learning, and engagement among our faculty, students and staff, and are critical to our mission to create, share, and apply knowledge to make Iowa and the world a better place.

At the same time, our international activities come with various risks, which are receiving increased attention from our federal research sponsors. The purpose of this memo is to provide information to the campus community on current federal conversations around international collaborations and affiliations, and to outline actions that researchers can take to ensure they are compliant with existing and new requirements related to international activities.

Background

In recent months, federal agencies have increased their efforts to ensure academic institutions effectively manage potential risks of international relationships, as noted in communications to the research community from the [National Institutes of Health](#) (NIH), [National Science Foundation](#) (NSF), [Department of Energy](#) (DOE), and [Department of Defense](#) (DOD).

While these memos signal strong agency commitments to open, transparent, and reciprocal collaborations, they also outline the renewed emphasis funding agencies are placing on the protection of intellectual property and confidential information, and on full disclosure of affiliations and conflicts. These concerns are grounded in inappropriate behaviors that have

come to light through recent investigations conducted across the country. Some of the behaviors include:

- Intellectual property articulated in grant proposals or generated from federally funded research being diverted to other countries and entities
- Peer reviewers sharing confidential information about grant applications with others in the US or abroad and/or attempting to influence funding decisions
- Investigators and senior personnel on funded agreements failing to disclose support received from and/or affiliations with other organizations, including foreign governments

In addition, membership in foreign talent programs is under increased scrutiny by federal agencies. Membership in foreign talent programs is a legal form of exchange among countries. However, some of the behaviors questioned through agency investigations have been related to affiliations with specific foreign talent programs, and investigators have been cited for failing to report these affiliations.

Unfortunately, the broader national discussion of these issues has increased the potential for profiling and/or illegal discrimination against members of our international community based on race, ethnicity, or national origin. Aspects of various investigations published in the media signal the need for campuses to proactively raise awareness and identify actions that can help prevent discrimination and harassment of community members who are, or who appear to be, from other countries.

In addition, with the increased focus that agencies are placing on accurate reporting of conflicts of interest and commitment, current and pending support, and affiliations with organizations, it has become clear that Iowa State needs to help researchers increase their understanding of federal requirements associated with sponsored awards, as well as the potential consequences of noncompliance, which can be severe both for an individual researcher and for Iowa State as the institution responsible for administering sponsored awards.

Initial actions you can take

Our longstanding goal is to ensure that all researchers protect themselves by complying with disclosure requirements related to their research, particularly with regard to international activities. In doing so, Iowa State recognizes that the vast majority of international collaborations are productive, reciprocal and transparent interactions that fully support our mission to create, apply and share knowledge.

For researchers participating in funded activities, please review your *Conflicts of Interest and Commitment (COIC) disclosure form*, and ensure that any international affiliations, funding or other collaborations are disclosed to both Iowa State and your funding agencies. This applies to broadly to personnel involved in the research project, including principal investigators, co-investigators, senior personnel, post-doctoral associates, graduate research assistants and

staff. Please contact Brooke Langlitz, Director, Office of Research Integrity (langlitz@iastate.edu, 515-294-7793), with questions about reviewing and completing the COIC form, and Tammy Polaski, Associate Director, Office of Sponsored Programs Administration (tra@iastate.edu, 515-294-0983), for updating disclosures submitted to sponsors for active awards.

For researchers submitting proposals, take the time to fully record all of your funding sources, affiliations, and conflicts of interest and commitment on your proposals. Disclosing domestic and international relationships (including talent programs) is required by research sponsors and other organizations. These disclosures allow for the appropriate review of proposals and protects the interests of the federal government, Iowa State, and most importantly, you and your collaborators. If the conflicts have not yet been disclosed through the university's COIC disclosure form, please update the form prior to submitting the proposal.

For researchers with proposals under review, review the information you submitted identifying your funding sources, affiliations and conflicts of interest and commitment on each of your pending proposals. If you discover previously undisclosed items, take action to update the proposal. Please contact Andrea Rich, Pre-award Manager, Office of Sponsored Programs Administration (arich@iastate.edu, 515-294-4642), if you have questions about how to update your proposal submission.

For all researchers, please be aware of the consequences that can arise when the agencies or Iowa State determine that you have not reported all of your conflicts of interest and commitment, affiliations, funding and other resources received from outside entities. In some cases, failure to make full and complete disclosures to sponsors could result in suspension or termination of funding for a project and ineligibility for future funding. Omissions in disclosures to Iowa State may result in sanctions or disciplinary actions in accordance with university misconduct policies and procedures and/or federal agency guidelines.

For all Faculty, staff, and students, if you experience or witness any behavior that you believe to be discriminatory or harassing based upon race, ethnicity, national origin, or any other protected classification, you should report such conduct to the Office of Equal Opportunity (eooffice@iastate.edu, 515-294-7612 or hotline 515-294-1222, or [online](#)).

Going forward

The actions listed above are just a few of those you should consider to ensure your international collaborations are well supported and compliant with federal law and university policies. Attached is a FAQ that outlines several other recommended actions to fully protect you and your collaborators in the US and abroad.

Please remember that Iowa State endorses an open scholarly climate in which research is a dynamic endeavor that transcends national borders. It is in society's interest that the best

minds from across the globe come together to collaboratively create new discoveries and novel solutions that address challenges we face locally, nationally and throughout the world.

It is also important to the university and its research sponsors that each member of the research community adhere to all university and sponsor policies. This includes not only the recommended actions around international engagement, but also continued respect for all of our colleagues at Iowa State regardless of race, ethnicity or national origin.