

## December 2019 Update

Dear Investigator,

I write to update you on recent sponsor guidance regarding the disclosure of international relationships and activities and of your obligations to report such activities to the University and federal sponsors. The SPS website (see [foreign collaborations](#)) continues to be updated to include sponsor released guidance as we become aware of it.

Please review the updates below for any sponsors that you plan to apply to or are currently engaged with to ensure you are aware of and compliant with their requirements. Additionally, and as a reminder, you must seek prior approval for consulting and disclose any significant financial interests to the University.

The following topics are covered below:

Department of Defense Update

National Institutes of Health Update

National Science Foundation Update

Letter from Office of Science and Technology Policy

Recent Articles

Where do I get help?

### **Sponsor Updates**

#### **Department of Defense**

Recently, the Under Secretary of Defense issued a [memo dated October 10, 2019](#) which lays out DoD's steps to date 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" and steps DoD plans to pursue, and calls for a dynamic, Government wide, partnership, " No laboratory, university, industry partner, or Government agency can address the full scope of this challenge alone, and solutions to this problem can only result from a dynamic partnership between our public and private sectors." This memo follows directives by the DOD in Notices of funding Opportunities related to research and research-related educational activities to include requirements to "submit additional Current and Active support information for all key personnel, whether or not the individuals are to be funded by the DoD."

Disclose all current and pending projects, whether or not they are funded through UConn including foreign projects.

### **National Institutes of Health**

The Council on Governmental Relations released a [Guide](#) for meeting disclosure requirements under Notice [NOT OD-19-114](#). The NIH requires reporting of research support from internal and external sources and the relationship to the NIH funding as critical information for NIH and grantee institutions to assess scientific budgetary overlap, and availability of time to commit to NIH funded projects. Based on conversations COGR staff have had with the NIH, the following summarizes COGR's understanding of what the NIH is requiring.

1. Key personnel must disclose funding for all research activities regardless of where the research will be carried out.
2. Key personnel must disclose start-up packages and support for research from entities other than the applicant institution.
3. Disclosing In Kind- Support
  - Key personnel must disclose in-kind resources that are uniquely available to key personnel (office/laboratory space, equipment, supplies, employees) including those available outside the applicant institution; details about in-kind personnel who are expected to work directly on a proposed project; report details of in-kind support in the Facilities and Other Resources section or in Other Support section of the application; report details of individuals who have expended at least one month of effort during the year (compensated or uncompensated) in the annual report (no change).
  - Key personnel are not responsible for disclosing institution-wide resources such as core facilities or shared equipment that are made broadly available.
4. Key personnel must disclose affiliations or appointments that are likely to be cited in NIH-funded publications in the biosketch section of the application.
5. Prior approval is required before initiating a new "foreign component" per current NIH policy (no change).

### **National Science Foundation**

The National Science Foundation issued their draft 2020 Proposal and Award Policies and Procedures Guide (PAPPG) for comment in May 2019, which included a requirement for senior personnel to report in grant proposals all sources of funding and payments, whether paid through the applicant institution or paid directly to the individual. NSF is currently reviewing comments and has not issued any new policies yet.

Disclose all current and pending projects, whether or not they are funded through UConn including foreign projects.

### **Office of the President, Office of Science and Technology Policy**

[Letter to US researchers from Director Klevin K. Droegemier](#) about the Joint Committee on the Research Environment and research security. The committee's work in this area is organized along four lines of effort: coordinating outreach and engagement, establishing and coordinating disclosure requirements, developing best practices for academic research institutions and developing methods for identification, assessment, and management of risk. He writes, "Working together, we will ensure that our research environments are safe and inclusive; operate with maximum integrity; protect our research assets in a manner balanced with openness and international collaboration that have been so critical to our success; and do not encumber researchers, agencies or institutions with unnecessary administrative work."

### **Recent Articles**

August 2019, [Professor Indicted for Alleged Undisclosed Chinese Links](#), Inside Higher Ed article on the investigation and prosecution on a University of Kansas research professor.

September 2019, [NIH Reveals Its formula for Tracking Foreign Influences](#), Science article on NIH methodology for threat identification.

November 2019, [Vast Dragnet Targets Theft of Biomedical Secrets for China](#), New York Times article that covers recent federal investigations.

### **Where do I get help?**

The University has offices to assist investigators in these areas. Each investigator has a responsibility to make sure they are compliant with all relevant University policies and federal requirements. These offices are here to assist and always welcome inquiries. Please encourage your faculty to reach out for help if they have questions:

#### **Faculty Consulting Office**

Sarah Croucher: [sarah.croucher@uconn.edu](mailto:sarah.croucher@uconn.edu); 486-5630 (Storrs and Regional Campuses)

Scott Wetstone: [wetstone@uchc.edu](mailto:wetstone@uchc.edu); 679-4440 (UConn Health)

#### **Financial Conflict Interest Services- see [Storrs and Regional Campuses](#) or [UConn Health](#)**

Wesley Byerly: [byerly@uchc.edu](mailto:byerly@uchc.edu); 679-2230

#### **Sponsored Program Services**

Laura Kozma: [laura.kozma@uconn.edu](mailto:laura.kozma@uconn.edu); 486-3798([Storrs and Regional Campuses](#))

Paul Hudobenko: [hudobenko@uchc.edu](mailto:hudobenko@uchc.edu); 679-3951 ([UConn Health](#))

#### **Export Control Services**

Carol Connolly: [carol.connolly@uconn.edu](mailto:carol.connolly@uconn.edu); 486-3994

#### **General Questions and Guidance**

Wesley Byerly: [byerly@uchc.edu](mailto:byerly@uchc.edu); 679-2230

Michael Glasgow: [michael.glasgow@uconn.edu](mailto:michael.glasgow@uconn.edu); 486-5011

Michelle Williams: [michelle.williams@uconn.edu](mailto:michelle.williams@uconn.edu); 486-3001

Please don't hesitate to contact any of us if you have questions or need assistance on these matters.

With regards,

Mike

Associate Vice President for Research

Sponsored Program Services