

UNIVERSITY OF MICHIGAN

# INTERNATIONAL ENGAGEMENT





# International Engagement

- U-M affiliated investigators conducting research outside the U.S.
- Funded and unfunded collaborations with investigators who are doing research outside the U.S.
- Appointments at, and affiliations with, foreign institutions (paid and unpaid)
- Foreign sources of other support (monetary and non-monetary)
- Visitors from foreign institutions

# U.S. Government Concerns

- Economic competitiveness
  - Loss (or deliberate theft) of intellectual assets
  - Loss of scientific and engineering talent
- Inappropriate use of taxpayer dollars
  - Conflicts of interest and commitment (COI and COC)
  - Overlap in funding by U.S. and a foreign entity
- Integrity of peer review process

# Why Should U-M Be Concerned?

- Protect U-M faculty research and results
- Exercise good stewardship of federal research funding
- Comply with federal regulations and statutes
- Potential consequences
  - Loss of funding, researchers and students
  - Sanctions and fines
  - Reputational harm

# Institutional Values

- Global university
  - Train and educate domestic and foreign students
  - Collaborate with domestic and foreign researchers
- Openness of fundamental research
- Compliant and ethical behavior



... not for a moment are we going to diminish our commitment to being a welcoming place for students and faculty from all around the world, and to enhance the ability of our faculty and students to establish collaborations and partnerships with talented, hard-working colleagues in every country. Doing so would be counter to our public mission and would diminish our value as a leading American research university.

**Mark Schlissel, U-M President**

**Rebecca Cunningham, U-M Interim VP for Research**

# Federal Agency Response

- Reviewing international collaborations for COI and COC
- Reviewing academic publications that involve international collaborators
- Reviewing appointments/research of faculty outside the U.S.
  - Particular attention to Talent Programs
  - DoE does not allow awardees to participate in certain programs
- Holding funding
- Emphasizing the importance of transparency and disclosure
- Increased enforcement activity, including criminal charges

# University Response

- Examining our policies and procedures
- Ensuring they are easy to understand and follow
- Enhancing and centralizing procedures for disclosing activities outside U-M, including significant revisions to the M-Inform disclosure system
- Developing a system to audit compliance
- Maintaining regularly updated informational webpages



# What is an Outside Interest?

- Paid or unpaid activities for, and relationships with, an outside organization for which the individual utilizes the same skills and knowledge as for his/her institutional responsibilities
- Ownership in a company or business
- Compensation, loans, other payment(s) or items of value received from an outside organization
- Some travel expenses that are reimbursed to an individual or paid directly by an outside organization

# Managing Outside Interests

- COI and COC are not inherently good or bad
- When you disclose an activity, staff and the appropriate committee (UMOR COI or MED COI) will review and determine if there is a conflict
- In a vast majority of cases, there is some way to manage the conflict

# Export Controls

- In general, our research is fundamental and the results are expected to be freely disseminated
- However, we sometimes use technologies that are export controlled
  - In general, these are technologies that cannot be exported to other countries or that require special government permission prior to export
  - Precise countries depends on the technology
  - This includes actual physical exports and "deemed" exports

# Faculty Responsibilities

- Familiarize yourself with funding agency and U-M policies
- Disclose all activities and affiliations in:
  - M-Inform, federal grant proposals, progress and final reports, and publications
- Register foreign travel
- Expand your knowledge of export controls
  - Do not bring electronic devices with sensitive data outside the U.S.
- Provide a welcoming environment for foreign visitors



# Attestations

- Read attestations carefully before signing
  - Providing false information on a PAF (and COI disclosure) is in violation of U-M policy and may lead to administrative action
- Providing false information to the U.S. Government may lead to civil and/or criminal penalties

# NIH Guidance

- International engagement needs to be reported at various times throughout the project lifecycle
  - Initial submission
    - Note foreign appointments or affiliations on biosketch
    - Note “foreign component” in Other Project Information form
  - JIT: Note foreign sources of support in Other Support form
  - RPPR (progress report): Update affiliations/support as necessary
- Prior approval from the NIH is required for foreign components not included in proposal

# NIH Defines "Other Support"

- All resources you have access to and are potentially related to your research
  - not just grants and contracts that directly support your research
- Financial and in-kind support from another institution or government (salary, lab support, travel funding, etc.)
- Support available to you at other institutions
- High-value materials (antibodies, transgenic or KO mice, etc.) that are not freely available to everyone
- Lab staff, students and postdocs whose salary is paid by a non-U-M entity and the funds are not awarded to U-M

# NIH Does Not Consider This "Other Support"

- Training awards
- Prizes
- Gifts
- Startup support from U-M (internal U-M startup support, lab space or training funds do not require disclosure)



# NIH Defines “Foreign Component”

- Performance of a significant scientific element or segment of a project outside of the U.S., either by U-M or a collaborator
- NIH funds do not need to be spent to qualify as a foreign component
  - Involvement of human subjects or animals
  - Extensive foreign travel for data collection, surveying, sampling, etc.
  - Activities that may impact U.S. foreign policy through involvement in the affairs or environment of a foreign country

# NIH Defines “Foreign Component”

- Examples of other grant-related activities that may be significant include:
  - 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

# NSF Defines “Current and Pending Support”

- All resources in support of, or related to, all of a researcher’s efforts, regardless of whether or not they have monetary value
  - Includes in-kind contributions (such as office/laboratory space, equipment, supplies, employees, students) whether or not intended for use on proposed project
- Source of support or official recipient of support is irrelevant
- Effective June 1, 2020



National security and competitiveness concerns are real, but our benefits from international engagement are far greater than the risks and these risks can be mitigated by thoughtful policies.

**U-M President Mark Schlissel**  
**Winter 2019 Commencement**



# INTERNATIONAL RESEARCH AND SCHOLARSHIP GUIDANCE

[research.umich.edu/international-research-scholarship-guidance](https://research.umich.edu/international-research-scholarship-guidance)

## EXPORT CONTROLS

[research-compliance.umich.edu/export-controls](https://research-compliance.umich.edu/export-controls)

## CONFLICT OF INTEREST

[research-compliance.umich.edu/conflict-interest-coi](https://research-compliance.umich.edu/conflict-interest-coi)

## EMAIL

[InternationalResearchGuidance@umich.edu](mailto:InternationalResearchGuidance@umich.edu)

