

To: Faculty with Federal Research Funding

CC: Deans and Senior Associate Deans for Research

From: Kam Moler
Vice Provost and Dean of Research

Date: October 25, 2018

Subject: Your responsibilities regarding Foreign Influence in Stanford research

Dear Colleagues,

In August, NIH Director Francis Collins issued a “Foreign Influence Letter to Grantees” (attached) and testified to the Senate Health, Education, Labor and Pensions Committee regarding concerns about systematic programs of foreign influence in U.S. research. I’m writing now to make sure that you’re aware of these concerns, and that you’re familiar with and following relevant agency and Stanford policies and processes. We value collaboration with foreign researchers, welcome foreign students to campus, and design our policies and practices to uphold our values: compliance with federal regulations, openness in research, and academic freedom.

Background

NIH Director Dr. Francis Collins issued a statement in August regarding NIH’s efforts to address threats to the integrity of U.S. biomedical research from undue foreign influence and breaches in peer review. In particular, he highlighted three areas:

1. Intellectual Property diversion from federally funded research projects;
2. Tampering with the peer review process, both in obtaining information included in proposals and in influencing decisions on who receives funding; and
3. Failure to disclose funding from foreign governments in grant applications.

NIH, other government agencies, and other stakeholders are identifying steps to address these areas. Dr. Collins has formed an Advisory Committee to the NIH Director, which is charged to do the following:

- Identify the best approaches for NIH and Universities, Research Institutions, and other Applicant Organizations, to partner to ensure that all sources of research support and all relevant affiliations and financial interests are accurately reported to the NIH
- Propose best approaches to facilitate appropriate collaboration with scientists across the globe, while helping to safeguard intellectual property in NIH applications or developed in whole, or in part, with support from the U.S. government
- Propose additional steps that NIH might employ to protect the integrity of the peer review process
- Carry out these actions in a way that reflects the long tradition of partnership between NIH and grantee institutions, and that emphasizes the compelling value of ongoing honorable participation by foreign nationals in the American scientific enterprise

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 NIH’s Office of Extramural Research (OER) will be providing additional information in the future.

What you need to do

I will share additional information and guidance as it becomes available. In the meantime, I want to remind you of your responsibility to:

- Disclose collaborations with foreign or domestic organization in compliance with sponsor requirements in your proposals and reporting. This may include exchanges of personnel, materials, or data.
- Disclose all research projects you devote effort to, ongoing or proposed, including any foreign sources of funding, in the Current and Pending Support/Other Support of your proposal application or at Just-in-Time, per sponsor instructions.
- Disclose your outside professional activities and financial relationships, whether compensated or uncompensated, through the Outside Professional Activities Certification System (OPACS) (opacs.stanford.edu). Such disclosures must include all work for or financial interests received from a foreign institution of higher education or the government or quasi-governmental organization of another country.
- Disclose financial interests related to your research in all public sharing of your Stanford research results - presentations, publications or otherwise. Journals and professional organizations (where results are presented) have different, often broader standards for disclosure than the University. Review those standards for each relevant journal or organization. Remind your group members to review those standards.
- Comply with US export control regulations when doing any of the following: traveling abroad, particularly when travelling with confidential information; collaborating with international partners either formally or informally; making international financial transactions; shipping materials internationally; transferring technology; or using restricted materials for research. Also follow the guidelines for travel to high risk countries and use clean loaner devices provided by Stanford: <https://uit.stanford.edu/security/travel/high-risk-countries-recommendations>.
- Sign and adhere to Stanford's [SU-18](#) and [SU-18a](#) agreements, promptly disclose intellectual property to the Office of Technology Licensing, and remind your group members to do the same.

Stanford joins the Association of American Universities in supporting both academic freedom in U.S. research and national security interests. By complying with sponsor requirements to disclose current and pending support, you can help protect these interests.

Resource Contacts

Sponsored research: Russell Brewer <grbrewer@stanford.edu>, Associate Vice President of Research Administration, Office of Research Administration

Sponsored research, dedicated to the School of Medicine: Kathleen Thompson <klt@stanford.edu>, Director, Research Management Group

Industrial contracts: Sally O'Neil <sally.oneil@stanford.edu>, Director, Industrial Contracts Office

Intellectual property: Karin Immergluck <Karin.Immergluck@stanford.edu>, Director, Office of Technology Licensing

Export control and foreign travel: Steve Eisner <steve.eisner@stanford.edu> Director of Export Compliance; Brendan Walsh <walshbm@stanford.edu>, Director of the Office of International Affairs

Conflicts of interest: Mary Lee <marylee@stanford.edu>, Director, University Conflicts of Interest

Conflicts of interest, dedicated to the School of Medicine: Barbara L. Flynn <bflynn@stanford.edu>
Director, School of Medicine Conflict of Interest Review Program

Relevant Policies and Resources

Research Policy Handbook

[4. Conflicts of Commitment and Interest](#)

[8. Export Controls](#)

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[Export Controls Decision Tree](#)

[9. Intellectual Property](#)

“Current and pending support” in Sponsored
Research Proposals:

[National Science Foundation](#)

- [National Institutes of Health](#)

Administrative Guide

[1.1.1 University Code of Conduct](#)

[12.1 Anti-bribery](#)

[NIH Policy Clarification to Disclose Foreign
Financial Interests](#)

[Statement by the Association of American
Universities, dated 10/23/18](#)