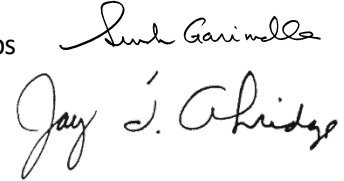


To: Faculty, Staff and Graduate Students

From: Suresh Garimella, Executive Vice President for Research and Partnerships
Jay Akridge, Provost and Executive Vice President for Academic Affairs
and Diversity



Date: November 8, 2018

Subject: Your responsibilities regarding disclosure and reporting requirements related to Foreign Influence on Purdue research and scholarship

Purdue University values international collaboration with researchers from around the world and welcomes students and scholars to campus from all parts of the globe. These international collaborations and educational opportunities are essential to successful fulfillment of our mission to move the world forward.

As you may know, the Director of the National Institutes of Health (NIH), Francis Collins, has recently issued a [“Foreign Influence Letter to Grantees”](#) and testified to the Senate Health, Education, Labor and Pensions Committee regarding 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 NIH’s Office of Extramural Research (OER) will be providing additional information in the future.

As NIH and other federal agencies and government officials debate these important topics, we would like to raise awareness of these issues at Purdue. Purdue policies ensure compliance with applicable laws and regulations, promote openness in research, and support academic freedom. Procedures are already in place for compliance with export control regulations, reporting foreign research support and collaborations, and personal financial interests associated with foreign governments, institutions of higher education, and research institutes. Given the heightened sensitivity to these issues nationally, we want to remind you of your obligations to report on international research and scholarly activities.

To ensure compliance with export control laws and regulations, University faculty, staff, and students are expected to coordinate with Sponsored Program Services and the University Development Office for any prospective sponsored research agreement or gift. Employees and students are also expected to coordinate with the Export Control/Information Assurance Office whenever a collaboration with, sponsorship of research by, or gifts from, a foreign entity or government are contemplated. **Compliance also requires that Purdue will not host visitors, enter into contracts, do business, or engage in any activity with entities listed on a United States Government Restricted Party List.**

Consistent with Purdue policy, individual researchers may not make any arrangements or commitments with a prospective funding source that would contractually bind the University without going through the appropriate University offices and administrative procedures. Our compliance hinges on your full and open disclosure and participation in the reporting process. The following is a list of reporting requirements.

What you need to know and do if you are engaging in international research or educational activities:

- Disclose to the Sponsored Program Services Office all research projects you devote effort to – 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 direct support provided to you, even if not officially through Purdue.
https://www.purdue.edu/business/sps/preaward/support_service.html
- Disclose to the University Development Office any gift solicitation with foreign organizations in compliance with University requirements.
<https://www.purdue.edu/policies/ethics/iiib5.html>
- Disclose your outside professional activities and financial relationships, whether compensated or uncompensated, through the Reportable Outside Activity Form. 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.
<https://www.purdue.edu/ethics/resources/ROAformguidelines.html>
- Disclose financial interests related to your research in all public sharing of research results including journal articles, presentations, and other publications. Journals and professional organizations have various, often broader, standards for financial interest disclosure than the University. Review those standards for each relevant journal or organization and disclose appropriately. Disclose to Purdue research related Significant Financial Interests, including stipends, living expenses, payments and travel reimbursements received from foreign governments and institutions.
<https://www.purdue.edu/research/regulatory-affairs/conflict-of-interest/>
- Comply with U.S. export control regulations when doing any of the following: accepting publication restrictions in research; traveling internationally and attending conferences; participating in international collaborations; using proprietary information; working with international staff and students; hosting international visitors; shipping materials internationally; or engaging in any international transactions.
<https://www.purdue.edu/research/regulatory-affairs/export-controls-and-research-information-assurance/>
- Follow the guidelines for travel to high-risk countries.
<https://www.purdue.edu/research/regulatory-affairs/export-controls-and-research-information-assurance/international-travel.php>
- Promptly disclose intellectual property to the Office of Technology Commercialization and remind your group members to do the same.
<https://www.purdue.edu/research/regulatory-affairs/intellectual-property.php>
- Comply with the Foreign Corrupt Practices Act.
<https://www.justice.gov/sites/default/files/criminal-fraud/legacy/2012/11/14/fcpa-english.pdf>

Thank you for complying with these requirements to disclose and report so that the University's and your interests are protected. If you have any questions about these requirements please contact Ken Sandel, Senior Director of Sponsored Program Services (sandel@purdue.edu), or Amy Noah, Vice President for Development (arnoah@prf.org).

While the above focuses on your responsibilities for reporting international collaborations, sponsorship and activities, these responsibilities do extend to your domestic activities as well. Please visit the Sponsored Program Services website for a complete summary of disclosure and reporting requirements.

Related Article:

National Institutes of Health (NIH), Letter, "[Foreign Influence Letter to Grantees National Science Board Statement on Security and Science](#)"