

To: Faculty and Staff

From: Dr. Tom Christensen, Provost and Executive Vice Chancellor for Academic Affairs
Dr. Jessi Smith, Associate Vice Chancellor for Research

Date: May 2, 2019

Subject: Disclosure and Reporting Requirements Related to Foreign Collaborations

The University of Colorado Colorado Springs is committed to fostering international research and educational collaborations; we are focused on creating global impact by cultivating and supporting collaboration on campus and across the globe while also promoting full transparency surrounding all interactions with external sponsors, industry and foreign entities.

As many of you may be aware, there have been recent statements and activities from governmental agencies related to national security with higher education and research organizations. We are reaching out to help ensure you are aware of these matters as you cultivate international collaborations.

The Director of the National Institutes of Health (NIH), Francis Collins, 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.

Please note these concerns are not limited to NIH. The Department of Defense, the National Science Foundation and Department of Energy have also expressed similar concerns.

While international collaboration is encouraged and supported, we ask faculty and staff to help ensure compliance and transparency. If you are engaging in research or educational activities that involve international collaboration you are expected to:

- **Disclose activities, including those with foreign entities in proposals, progress reports, and final technical reports as required by the sponsoring agency.** Check specific agency guidance or contact the Office of Sponsored Programs and Research Integrity osp@uccs.edu.
- Key personnel should ensure they disclose all applicable other support and collaborators as required by the sponsoring agency. Check specific agency guidance or contact the Office of Sponsored Programs and Research Integrity osp@uccs.edu. Key personnel may want to review all pending proposals and active awards to ensure that all foreign

components have been disclosed. If an omission or error is identified, contact the Office of Sponsored Programs and Research Integrity osp@uccs.edu to have the error corrected.

- Ensure your conflict of interest disclosure is current and update it as circumstances change. <https://www.uccs.edu/hr/employee-relations/conflict-of-interest>
- Install relevant IT security updates and report any suspected compromises to the Information Technology Security Office. <https://www.uccs.edu/oit/security>
- Comply with the Foreign Corrupt Practices Act. <https://www.justice.gov/criminal-fraud/fcpa-guidance>
- Comply with U.S. export control regulations, as applicable, when campus approves publication restrictions; 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.uccs.edu/osp/export-controls>

Please consult with the appropriate offices on campus to ensure that applicable laws and regulations are being followed. Thank you for attention to this matter and commitment to ensuring compliance while fostering international collaborations. If you have any questions about these requirements please contact Gwendolyn Gennaro, Executive Director Office of Sponsored Programs and Research Integrity, ggennaro@uccs.edu or Mike Sanderson, Associate Director Office of Sponsored Programs and Research Integrity, msander3@uccs.edu.