

International Research Town Hall

Charles River Campus

Wednesday, October 16 | 3:30-5 pm

Medical Campus

Wednesday, October 30 | 9-10:30 am

Overview

Boston University Research

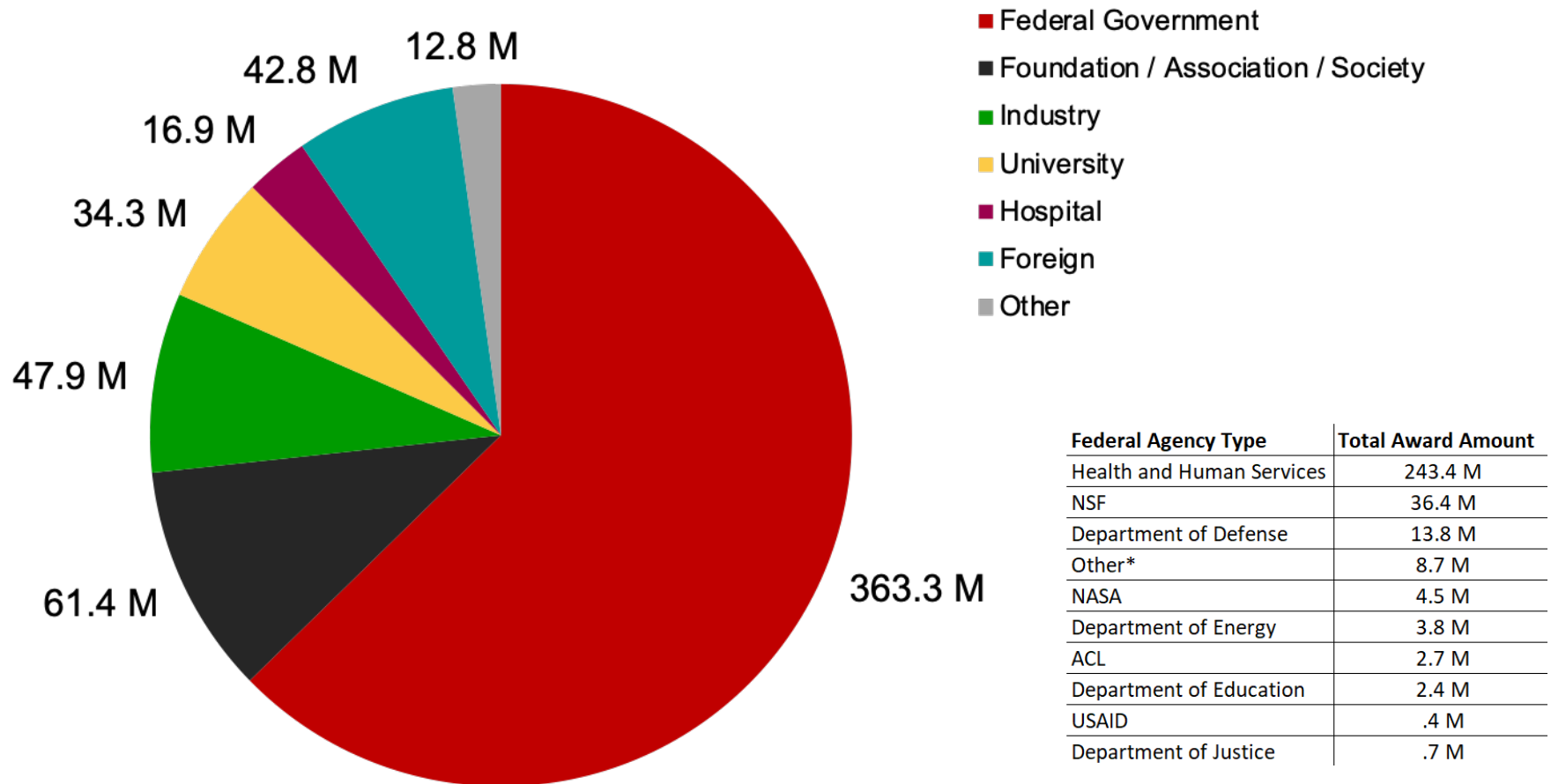
The Changing Federal Landscape

Faculty Rights & Responsibilities

Best Practices

Q&A

In FY19, BU received \$579.4 million in total award funding—63% of which was from the federal government.



**Examples of Other Federal Agency Type include VA funding, Corporation for Public Broadcasting, NEA, Department of State, Department of Agriculture, Department of Commerce, Department of the Interior, Department of Transportation*

The Changing Federal Landscape

National Institutes of Health (NIH)

Mar 2018: Obligation to disclose Financial Conflict of Interest (FCOI), specifically foreign financial interests.

Aug 2018: NIH director Francis Collins issues letter to community about threats from foreign entities.

July 2019: Reminder of NIH policies related to FCOI and Other Support.

National Science Foundation (NSF)

Oct 2018: National Science Board affirms commitment to free exchange of ideas and information, while acknowledging need for new policies to protect national interests.

July 2019: NSF issues “Dear Colleague” letter about research protection. Senior project personnel on proposals are required to disclose all professional appointments and sources of support, both foreign and domestic.

The Changing Federal Landscape

Department of Defense (DOD)

Aug 2018: The National Defense Authorization Act requires the DOD to develop procedures limiting foreign access to technologies through grants, contracts, cooperative agreements or other transactions and to limit undue influence, including through foreign talent programs.

Mar 2019: DOD requires proposers for all non-procurement transactions to submit detailed information on other current and pending support for all “key personnel.”

Oct 2019: Integrity of our research enterprise is a national priority. The department is pursuing government-wide approaches.

Department of Energy (DOE)

Dec 2018: Researchers in unspecified “emerging research areas and technologies” no longer allowed to collaborate with colleagues from unnamed “sensitive” countries.

Jan 2019: Restrictions on participating in any foreign talent recruitment programs, whether or not researcher is a U.S. citizen.

June 2019: Directive on Foreign Government Talent Recruitment Programs for federal and contractor personnel. DOE is expected to issue a separate policy directive to implement the requirement on DOE grants and cooperative agreements.

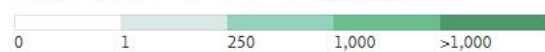
There is growing concern from these agencies that foreign entities may seek to influence U.S. research at all levels.

Three areas of concerns specifically cited by NIH:

1. Integrity and confidentiality of peer review
2. Diversion of intellectual property
3. Sharing of confidential information and the use of resources originating outside the U.S.

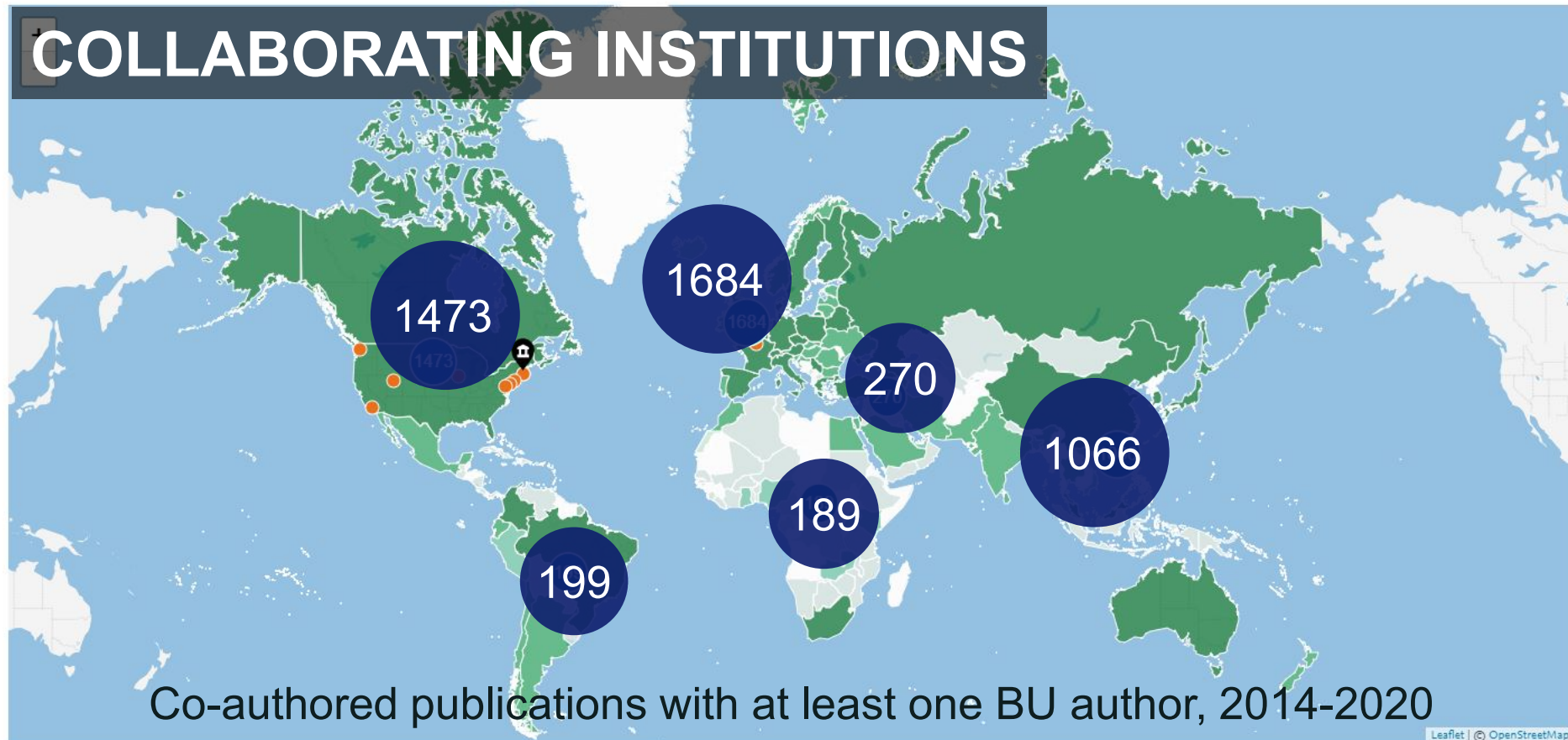
Why Does It Matter?

Co-authored publications per country/region:



collaborating Institutions

● Top 10 institutions worldwide by co-authored publications



Source: SciVal, October 2019

Ad Hoc Committee on Research Security & Conflicts of Commitment

Appointed by President Brown – May 2019

Members:

- John Byers, Associate Dean and Professor, CAS
- Ron Corley, Director, NEIDL and Professor, MED
- Stacey Dogan, Associate Dean and Professor, LAW
- Mike Sorenson, Senior Associate Dean and Professor, CAS
- Joyce Wong, Professor, ENG

Issues to Address:

- How to best communicate with faculty about the issues
- How to use annual reporting to identify potential conflicts
- How to strengthen systems for visiting faculty and staff
- How to support faculty traveling abroad
- New policies that may be needed

Faculty Rights

- “Academic freedom is essential in institutions of higher education if they are to make their proper contribution to the common good. The common good depends upon the free search for truth and its free exposition. It is that which justifies academic freedom, not the interest of the individual faculty member or even the interest of a particular university.”
- BU faculty members are “entitled to full freedom to engage in research, scholarship, and creative work and to publish or produce the results, subject to responsible performance of these and other academic duties.”

This policy applies to all faculty members of the University.

From the BU Faculty Handbook:

bu.edu/handbook/ethics/academic-freedom



University & Faculty Responsibilities

BU's Role

1. Educate faculty about federal regulations.
2. Provide resources and support to help faculty navigate this landscape.

Faculty's Role

1. Stay up-to-date on federal regulations and BU policies.
2. Complete all aspects of federal grants and BU's external activity report thoroughly, including:
 - Disclosures of foreign ties
 - Disclosures for your visiting researchers and postdocs
 - Consulting appointments



Key Points

- 1 Complete all aspects of federal grants thoroughly, especially items related to “foreign components”
- 2 Update funding agencies on new foreign engagements
- 3 Complete conflict of interest disclosures when required
- 4 Report intellectual property to BU to ensure it’s protected
- 5 Familiarize yourself with BU policies related to research agreements and export control

A “foreign component” is any significant scientific element or segment of a project performed outside of the US.

This NIH term applies to both grant recipients and researchers employed by foreign organizations, whether or not grant funds are expended.

Defined As...

- The involvement of human subjects or animals at a foreign institution
 - Extensive foreign travel by recipient project staff for data collection, surveying, sampling, and similar activities**
 - Any activity of the recipient that may have an impact on U.S. foreign policy through involvement in the affairs or environment of a foreign country
-

Examples

- 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

** This list is not comprehensive.*

*** Foreign travel for consultation is NOT considered a foreign component.*



1

Complete all aspects of grants thoroughly, especially items related to foreign components.

- Read carefully the request for application (RFA), request for proposal (RFP), solicitation, announcement, or guidelines
- Fully respond to the questions
- Complete BU's new proposal summary form (PSF) and NIH RPPR summary form (RSF) to help highlight what needs to be disclosed*
- Your “other support” page should include all funding from those in your lab/program who may receive funding from their home institution or sources that do not flow through BU – regardless of whether they are working on this particular project
- Ensure your Biographical Sketch includes all appointments/affiliations
 - Include paid, unpaid and honorary appointments
 - This information should align with your External Activity Report

**Note: This will evolve; it is your obligation to know what each agency requires.*



2

Update funding agencies on new foreign engagements.

- If considering a collaboration with a foreign investigator that may result in publication – seek PRIOR approval from the funding agency.
- These requests are submitted to the grants official by Sponsored Programs.

3

Complete a financial conflict of interest disclosure whenever required.

- BEFORE each proposal is submitted, the PI is expected to:
 - Complete a financial COI disclosure
 - Identify personnel responsible for the design, conduct, or reporting of research and ensure they have also completed a financial COI disclosure
- You are certifying to this requirement on the proposal summary form (PSF).

4

Report all intellectual property to BU's Technology Development office to ensure it's protected.

- Any inventions conceived or first actually “reduced to practice” using grant funds are required, by law, to be reported
- On the disclosure form, list all collaborators that made an inventive contribution to the invention
- Cite all funding that contributed to the invention conception or first actual reduction to practice for compliance purpose

BU's IP Policy, Agreement, FAQs:

bu.edu/researchsupport/ip-policy

Technology Disclosure Form:

bu.edu/researchsupport/otd

Familiarize yourself with BU policies related to research agreements and export controls.

Export controls are federal government regulations that restrict the transfer of certain materials, technology, or software abroad or to non-US persons in the United States.

Two sets of export controls govern research and shipments:

- [Export Administration Regulations](#) (EAR) govern dual-use items, technologies, and software with commercial and military applications
- [International Traffic in Arms Regulations](#) (ITAR) govern materials, technologies, and software designed for military applications.

Resources:

- bu.edu/researchsupport/formsandpolicies

Resources for Traveling Overseas

International Travel Risk Policy | bu.edu/policies/international-travel-risk/

International Travel Registry | bu.edu/globalprograms/international-travel-registry

- Faculty are strongly encouraged to register
- Required for staff and all undergraduate and graduate students

Technology and Personal Information

- Travel prep:
bu.edu/globalprograms/manage/technology/computers
- Laptop/GPS checklist & securing a clean laptop for travel:
bu.edu/researchsupport/compliance/export-control

Other Resources from Global Programs

- Risk management for overseas travel
- Other localized concerns
- Knowledge of other projects and resources on the ground as needed
- Outreach/assistance in the event of an emergency

Questions?

Concerns?

Recommendations?

Connect with us.



research@bu.edu



bu.edu/researchsupport/intl