

Federal Agency Directives on Foreign Interactions

What Faculty Members Need to Know

Office of Research and Sponsored Programs

September 6, 2019





The University of Toledo

- Is not a company
- Is not a federal laboratory
- Is not a research institute
- Is a university where openness and exchange of ideas are fundamental
- Welcomes international collaboration to advance discovery and education



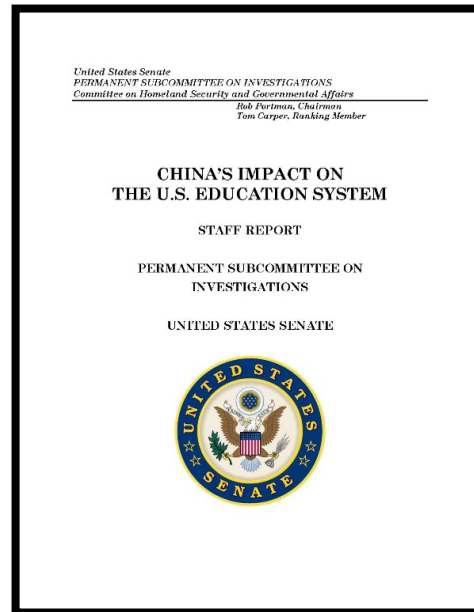
Federal Government Activities Requiring University Attention

- Bipartisan Congressional Concerns
- FBI Meetings with University Presidents and Leaders
- Federal Agency Actions and Directives for Funded Projects



Bipartisan Congressional Concerns

- Theft of Intellectual Property
- Espionage
- Concern Over Confucius Institutes
 - Lack of Transparency
 - Lack of Reciprocity



Senator Chuck Grassley (R-IA) has been concerned about [foreign](#) powers poaching U.S.-funded research. BILL CLARK/CQ ROLL CALL/AP IMAGE

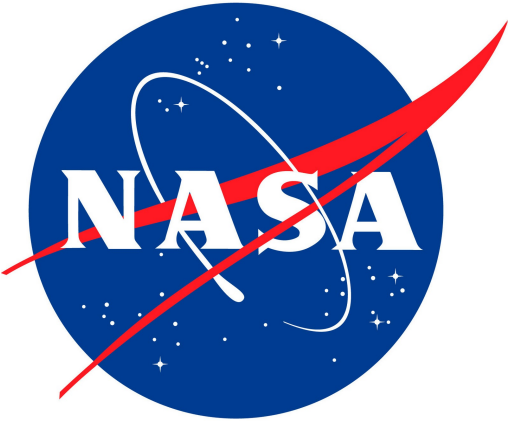
Influential senator asks NSF for data on threat from foreign influences

By [Jeffrey Mervis](#) | Apr. 15, 2019, 5:15 PM

The National Science [Foundation](#) (NSF) has joined the list of federal agencies that Senator Chuck Grassley (R-IA) has asked for explanations of how they are preventing foreign scientists from ripping off U.S. taxpayers.



Agency Directives and Communications





August 2018 Francis Collins Letter

Areas of Concern*

- Failure to disclose resources from foreign entities
- Diversion of IP in grant applications or NIH supported research
- Sharing of confidential information on grant applications

Action

- All applicants and awardees must disclose *all* forms of support and financial interests
- All relevant affiliations must be disclosed (e.g., 1000 Talents Program)

* Concerns are shared across funding agencies (e.g., NSF, DOE)



Professor Indicted For Failure To Disclose on Grant

- University of Kansas professor (August 2019)
 - Charged with failure to disclose a full-time employment contract held with a Chinese university while conducting research at U Kansas funded by federal research contracts
 - Charged with one count of wire fraud and three counts of program fraud

<https://www.insidehighered.com/news/2019/08/23/kansas-professor-indicted-allegedly-failing-disclose-appointment-chinese-university>

Areas of Concern: Disclosures

- Faculty with affiliations with entities in foreign countries (e.g., 1000 Talents Program)
- Failure to disclose financial contributions, effort, and non-financial support of research
- Failure to disclose collaborations or contacts with others outside the U.S. or with an international organization

Your Disclosure Responsibilities

Required reporting for federal grants and contracts

- List all appointments in biosketches
- Report other support for all senior personnel/PIs/Colts
 - Include domestic or foreign consulting, resources, and financial or non-financial support of your research endeavors
 - Update “Other support” for all senior personnel in reports, and disclose all participants with institution, country of origin
- Report time commitments on other projects/contracts
- Effort reporting on funded grants and projects
- “Outside Professional Service Report” from Office of the Provost

Areas of Concern: Travel and Data

- Travel to selected countries regardless of source of funding
 - Possible diversion of unpublished research results or IP
- Vulnerable devices/data taken to selected countries
- Access to home university data/files while on international travel
 - theft of data, exposure to malware

Your Travel Responsibilities

- Individuals traveling overseas for university purposes or university related business must complete the Travel Registry (<https://www.utoledo.edu/cisp/travel-registry/>)
- Consult with Office of Research and Sponsored Programs about the Travel Kit for foreign travel

Travel Kit Overview

Users in scope:

- Researchers with UT IP and/or research data who are visiting a sensitive country

Kit includes:

- Loaner laptop provided with Microsoft Office
- Access to a secure Virtual Machine provided for primary computer needs and access to email

Users have limited account access during travel. Access to the following resources will be restricted:

- Z: Drive shares, Office 365 excluding Outlook, SharePoint, UT servers

Full access restored upon return.

Travel Kit Procedures

- Request Travel Kit by submitting an IT Helpdesk request including your date of departure
- IT will contact you to schedule pickup and provide training to access the secure virtual lab
- Laptop will be erased upon return to IT

Areas of Concern: Foreign Visitors

- Foreign delegations visiting UT laboratories
 - Contact Office of Research as soon as you become aware of the potential for visitors
 - Provide country of origin
 - RSP will assess possible export control restrictions based on the individual labs to be visited and research conducted
 - Once persons are identified, provide names to RSP for screening
- Extended visits from foreign visitors
 - Notify the Provost's Office



Higher Ed Organization Advice

- **AAU/APLU April 22, 2019 Memo**
 - Awareness Building and Communications
 - Coordination (Task Forces)
 - Training of Faculty and Students
 - Review of Foreign Gifts, Grants, Contracts and Collaborations
 - Review of Faculty Foreign Financial Interests and Affiliations
 - Protection of Data and Cybersecurity
 - Protection of IP
 - Foreign Travel Safeguards (Clean Laptops, etc.)
 - International Visitors
 - Export Control
 - Interaction with Federal Security Agencies (e.g., FBI)

- **The Hague Center for Strategic Studies**
- **ACE May 10th Letter from Ted Mitchell**



THANK YOU

Frank J. Calzonetti, Ph.D., Vice President for Research
Frank.Calzonetti@utoledo.edu

