

TO: THOMAS JEFFERSON UNIVERSITY
ALL FACULTY AND PHYSICIANS ENGAGED IN RESEARCH
KEY ADMINISTRATORS/KEY SUPPORT STAFF

FROM: Mark L. Tykocinski, MD, President, Thomas Jefferson University
Theodore F. Taraschi, PhD, Senior Associate Provost of Research Conduct and Compliance

RE: **Foreign Involvement and Influence on Research: The Importance of Disclosing Foreign Engagements**

DATE: July 27, 2022

Thomas Jefferson University (“Jefferson”) is committed to upholding the [National Institutes of Health](#), [Department of Defense](#), [National Science Foundation](#), and the [Department of Energy](#) issued guidance concerning those agencies' growing concerns over the potential for foreign influence on research. There remains a heightened concern that certain foreign entities may be seeking to influence U.S. research at all levels, including peer review, intellectual property diversion, and sharing confidential information. The use of resources originating outside the U.S. **Non-compliance with federal guidelines and requirements could result in loss of federal funding**, not only for the person who failed to report but for Jefferson as a whole, as well as federal investigations and even criminal charges against individual researchers.

REMINDER: Sustained federal research funding is critical to Jefferson’s success and impact. Therefore, all employees engaged in research activities must comply with policies and regulations, including those related to full disclosure of engagements with foreign entities. A foreign entity means an entity located outside the USA. It includes, but is not limited to, foreign governments or components thereof, companies (non-profit or for-profit), and academic entities (universities, research centers, and academic medical centers). Note, disclosures are needed for both internal and external purposes. Please read the policies carefully to ensure that you are wholly reporting all external engagements, financial interests and support, affiliations, and relationships with any foreign entities, whether or not grant funds are expended, to all listed below.

ACTION REQUIRED NOW: To ensure you are in compliance, please review your current disclosures and update your disclosures as necessary as soon as possible to reflect all foreign involvement (past and present).

INTERNAL DISCLOSURES AND PROCEDURES:

- Conflict of Interest (COI) [University Policy #107.03](#). This policy ensures disclosure and appropriate vetting of external activities to identify and remediate conflicts of interest. Submit your disclosure (**annually and within 30 days of acquiring new financial interests**) indicating whether you have engaged in outside activities at any time during the fiscal year.
 - Respond to the question on the [COI SMART](#) disclosure about interacting with a foreign entity to learn whether you are/are planning to become:
 - An owner, founder, or manager of a foreign entity.
 - An employee of a foreign entity.
 - A consultant or independent contractor of a foreign entity or government.
 - An operator of a laboratory or research facility in a foreign country.
 - An investor in a foreign entity.
 - A participant or financial sponsor of research conducted in a foreign country.
 - Read more about required COI disclosures on the Jefferson COI website:
https://jam8.sapjam.com/groups/B7eVbVhv5EOangaCnT8j3M/content?folder_id=BSm5hd4KB45zVewYuZcmVE
- Conflict of Commitment (COC) [University Policy #500.07](#). This policy ensures disclosure and appropriate vetting of external activities to identify and remediate conflicts of commitment. All external activities that involve working with a foreign government or entity must receive prior written approval from the Supervisor and the Provost (or the Provost’s designee) before engaging in the activity.
 - Before engaging, complete a request [Participate in External Activity](#). Per policy, external activities include but are not limited to:
 - Holding a paid or unpaid position such as founder, partner, employee, faculty member, or board member.
 - A participant or member of a Governing Board or Scientific Advisory Board of a foreign entity.
 - Read more [illustrative case examples](#).

EXTERNAL DISCLOSURES AND PROCEDURES:

- When submitting applications for federal grants, list all foreign affiliations in the [Biographical Sketches](#) and [Other Support](#) sections, identify any changes in each annual progress report, and close out summaries. According to the NIH [policy](#), this includes but is not limited to:
 - Collaborations with investigators at a foreign site anticipated to result in co-authorship.
 - Use of facilities, research materials, or instrumentation at a foreign site.
 - Receipt of financial support or resources from a foreign entity.

SUMMARY: It is expected that professional commitment of time and intellectual input is in support of Jefferson. When applying for federal grants, you need to be transparent about any affiliations with foreign entities. Only by your full disclosure will Jefferson be in compliance with federal regulations and be able to advise, assist, and protect you and your work.

NOTE: As federal guidance on this topic continues to evolve, updated guidance will be provided. Thank you for your attention and continued care to ensure Jefferson remains compliant.

For more information contact: Theodore F. Taraschi, PhD (Theodore.Taraschi@jefferson.edu), Senior Associate Provost for Research Conduct and Compliance or visit the Foreign Influence on Research website: <https://research.jefferson.edu/resources/conduct-compliance/foreign-influence.html>.