

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

FROM: Mark L. Tykocinski, MD, Provost and Executive Vice President, Academic Affairs
Brian N. Squilla, MBA, Senior Vice President of Administration
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: November 24, 2020

Thomas Jefferson University ("Jefferson") is committed to sustaining an environment that attracts and retains the brightest scholars and most exciting scholarship and likewise is committed to Jefferson's principles of academic freedom. Our talented scholars and students are essential to the research and education enterprise on our campuses and we highly value their contributions. At the same time, like all other institutions of higher education, Jefferson and its faculty must adhere to federal reporting and disclosure requirements. Not doing so 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.

In 2019, the [National Institutes of Health](#) and [Department of Defense](#), the [National Science Foundation](#) and the [Department of Energy](#) issued guidance concerning those agencies' growing concerns over the potential for foreign influence. There remains a heightened concern that certain foreign entities may be seeking to influence U.S. research at all levels including peer review, diversion of intellectual property, sharing of confidential information and the use of resources originating outside the U.S. While other federal agencies have not yet provided their guidance, they will likely follow suit.

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 foreign engagements. Continue to disclose all external financial interests and support, affiliations, activities and relationships with any foreign entities, whether or not grant funds are expended, to all listed below:

- Submit your Conflict of Interest (COI) report (no less than annually or within 30 days of acquiring new financial interests) indicating whether you have engaged in outside activities any time during the fiscal year.
 - Respond to the new question added about working with a foreign entity to learn whether you are/are planning to become:
 - An owner, founder, or manager of a foreign entity.
 - A participant or member of a Governing Board or Scientific Advisory Board 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.
 - I do not maintain or plan to initiate any of the above-identified relationships
 - Read more about required COI disclosures on the Jefferson COI website:
https://jam8.sapjam.com/groups/B7eVbVhv5EOangaCnT8j3M/content?folder_id=BSm5hd4KB45zVewYuZcmVE
- When submitting applications for federal grants, list all foreign affiliations in the Biosketch and Other Support sections and identify any changes in each annual progress report and closeout summaries. According to the NIH policy this includes listing:
 - 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;
 - Income or payments for salaries, consulting or honorariums;
 - Holding a paid or unpaid position such as founder, partner, employee, faculty member or board member;
 - Having ownership interests such as stocks, bonds or stock options; and
 - Travel funds or reimbursements, or extensive foreign travel for the purpose of data collection, surveying, sampling and similar activities.
 - Acknowledge any external support or engagement in public presentations or publications.
- Obtain the review and approval of your supervisor before engaging in any "outside" professional activities.
- Report any gifts or philanthropic support from a foreign individual, entity or government to Jefferson's Office of Institutional Advancement ("OIA"). If you choose to donate honoraria from a foreign entity to Jefferson, coordinate such donation through OIA.
- Contact the Innovation Pillar when considering working with a foreign individual, entity or government regarding a license, transfer of materials or other project under which any Jefferson materials, data or information might be shared with a foreign party.

SUMMARY: You need to be transparent about any affiliations with foreign entities when applying for federal grants. 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.

For more information, visit Foreign Influence on Research website: https://research.jefferson.edu/resources/conduct_compliance/foreign-influence.html