



AUBURN UNIVERSITY

OFFICE OF THE PROVOST

To: Faculty, Staff, and Graduate Students

From: Bill Hardgrave, Provost and Vice President for Academic Affairs *BH*
Jennifer Kerpelman, Interim Vice President for Research *JK*
Ron Burgess, Chief Operating Officer *RS*

Date: February 21, 2019

Subject: Responsibilities Regarding Disclosure and Reporting Requirements
Related to Foreign Influence on Auburn Research and Scholarship

Auburn University ("Auburn" or "University") values openness, freedom of expression, and the free exchange of scientific ideas. Auburn welcomes international students and scholars from all parts of the world and encourages international collaborations with foreign organizations and institutions. These activities are essential to fulfilling Auburn's core academic mission.

The Director of the National Institutes of Health (NIH), Francis Collins, has recently issued a "Foreign Influence Letter to Grantees." Dr. Collins stated, *"Unfortunately, threats to the integrity of U.S. biomedical research exist. NIH is aware that some foreign entities have mounted systematic programs to influence NIH researchers and peer reviewers and to take advantage of the long tradition of trust, fairness and excellence of NIH-supported research activities. This kind of inappropriate influence is not limited to biological research; it has been a significant issue for defense and energy research for some time."* Additionally, in response to security concerns, the Association of American Universities (AAU), the Association of Public and Land-grant Universities (APLU), the American Council of Education (ACE), and the Council on Government Relations (COGR), issued a joint statement declaring, *"The global events of recent years and evolving threats to the United States present new security challenges and require a careful reassessment of our nation's security vulnerabilities, including those of colleges and universities Our member research universities share a vested interest with the government in ensuring that intellectual property, proprietary information, trade secrets, sensitive data, classified and other controlled government information developed or housed at our institutions is not*

susceptible to academic exfiltration, espionage or exploitation Accordingly, we welcome the opportunity to continue to work constructively and cooperatively with Congress and the major national security agencies, including the Federal Bureau of Investigations (FBI), the Central Intelligence Agency (CIA), the National Security Agency (NSA), and the Departments of Justice, Homeland Security, State, Defense, Commerce and government research agencies to protect legitimate national security interests associated with scientific research conducted at universities.” Many of these government agencies and departments are developing or have existing partnerships with academia to help address these security concerns. Given the heightened sensitivity to these issues, we want to remind you of your obligations to report on international research and/or collaborations.

In accordance with University policies and procedures, and to ensure compliance with export control laws and regulations, University faculty, staff, and students are expected to coordinate with Sponsored Programs, Innovation Advancement and Commercialization (industry funding), or the Office of Development for any prospective sponsored research or gift. Auburn personnel should also contact the Research Security Compliance Office whenever a collaboration with or visit from a foreign person, university, company or government is being contemplated. Compliance with federal law requires that Auburn will not host visitors, enter into agreements, or engage in any activity with entities listed on a United States Government Restricted Party List (contact the Research Security Compliance Office for guidance).

Auburn researchers should not make any arrangements or commitments with a funding source which would contractually or legally bind Auburn without going through the appropriate University offices and administrative procedures. Compliance hinges on your full disclosure and participation in the reporting process. What you need to know and do if you are engaging in international research or educational activities:

- Disclose to Sponsored Programs and/or Innovation Advancement and Commercialization (industry funding), all research projects, ongoing or proposed, that could include any potential sources of foreign funding.

<https://cws.auburn.edu/OVPR/pm/osp/home>

<https://cws.auburn.edu/OVPR/pm/tt/home>

- Coordinate with the Office of Development/AU Foundation for any gift solicitation with foreign organizations.
<http://develop.auburn.edu/>
- Disclose your outside consulting activities and financial relationships in accordance with the requirements of Chapter 8 of the [Faculty Handbook](#).
- Disclose financial interests related to your research in all public sharing of results. Journals and professional organizations often have broader standards for financial interest disclosure than the University.
- Applicable University personnel are required to recognize and disclose significant financial interests that might give rise to conflicts of interest or the perception of conflicts and to ensure that such conflicts are seen to be properly managed or avoided, with the goal of ensuring, to the extent possible, institutional responsibilities are free from bias and inappropriate influence.
<https://cws.auburn.edu/OVPR/pm/compliance/fcoi/home>
- Comply with U.S. export control laws and regulations when accepting publication restrictions, traveling internationally and attending conferences, conducting international collaborations, using proprietary information, working with international staff and students hosting foreign visitors, and making international shipments.
<http://www.auburn.edu/administration/oacp/orsc.php>
- Follow the guidelines for reporting international travel through the Request for Authority to Travel Outside the 50 United States (RAT50) process.
<https://sites.auburn.edu/admin/universypolicies/Policies/TravelPolicies.pdf>
- Promptly disclose intellectual property and proprietary information to the Innovation Advancement and Commercialization Office.
<https://cws.auburn.edu/OVPR/pm/tt/home>
- Comply with the Federal Foreign Corrupt Practices Act.
<https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act>

Thank you for complying with these disclosure and reporting requirements. If you have any questions about these requirements, please contact [The Office of Research Security Compliance](#).

While the above focuses on your responsibilities for reporting international collaborations, sponsorship and activities, please ensure adherence to requirements applicable to domestic activities as well.