INTERNATIONAL COLLABORATION AND ACTIVITIES

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May - June 2020
RECENT HEADLINES

New York Times

*Universities Face Federal Crackdown Over Foreign Financial Influence*

Prospective students at Georgetown University in Washington in March. The Education Department is investigating whether Georgetown and three other universities fully complied with a federal law about gifts and contracts from foreign countries.  Jim Lo Scalzo/EPA, via Shutterstock

By Erica L. Green
Aug. 30, 2019

Associated Press

*US researchers on front line of battle against Chinese theft*

By Eric Tucker
October 7, 2019 GMT

Associated Press

*Van Andel Institute to pay $5.5 million for not disclosing Chinese grants*

Eric Tucker
Associated Press

Civil case part of broader crackdown by Justice Department and other agencies. Grand Rapids-based institute does not admit wrongdoing, defends research
RECENT HEADLINES

Science

U.S. academics, make sure you know the rules about foreign funding and affiliations
By Beryl Leff Anderson | Sep. 17, 2019, 10:00 AM

Science

NIH reveals its formula for tracking foreign influences

Science

U.S. takes aim at foreign influence

Chicago Tribune

How a Chicago college student ended up in the middle of an FBI investigation into Chinese spying

Inside Higher Ed

Balancing National Security and Scientific Collaboration
Submitted by Elin Johnson on September 5, 2019 - 3:00am

Inside Higher Ed

Federal officials document international threats to U.S. science security
Submitted by Doug Lederman on November 13, 2019 - 3:00am
RECENT HEADLINES

U.S. Department of Justice

FOR IMMEDIATE RELEASE
Department of Justice
Office of Public Affairs

Former Emory University Professor and Chinese “Thousand Talents” Participant Convicted and Sentenced for Filing a False Tax Return

New York Times

U.S. Accuses Harvard Scientist of Concealing Chinese Funding

Prosecutors say Charles M. Lieber, the chair of Harvard’s chemistry department, lied about contacts with a Chinese state-run initiative that seeks to draw foreign-educated talent.

U.S. Department of Justice

FOR IMMEDIATE RELEASE
Western District of Arkansas

University Of Arkansas Professor Arrested For Wire Fraud
2018

August 20, 2018
Francis S. Collins, M.D., Ph.D.
Director of NIH Issues
“Statement on Protecting the Integrity of U.S. Biomedical Research”

2019

June 2019
Convened University-wide Committee

July 10, 2019
NIH Issues Reminder on Other Support, FCOI, and Foreign Components
(NIH Notice: NOT-OD-19-114)

July 11, 2019
“Dear Colleague Letter: Research Protection”

January 28, 2020
U.S. Accuses Harvard Scientist of Concealing Chinese Funds

Delayed Until October 1, 2020

June 1, 2020
New PAPPG Requirements

March 13, 2020
U.S. Declares State of Emergency for COVID-19

2020

June 2020
GMAS Release: International Collaboration and Activities
UNIVERSITY INITIATIVES

• Developed enhanced guidance and FAQs for Faculty Disclosures

• University-wide Research Compliance Policy Review Committee convened to review policy and processes with an eye towards Harvard’s policies, systems, and administrative infrastructure as needed to improve foreign disclosure compliance

• Systems enhancements (e.g., GMAS and FCOI/Outside activity) are an integral component on the administrative side to parallel the work of faculty committees
THE IMPORTANCE OF IDENTIFYING INTERNATIONAL COLLABORATIONS AND ACTIVITIES

Respond to increased focus by federal agencies and sponsors
- Identify the impact and potential influence of international connections
- Ensure sponsored programs are compliant with existing agency requirements

Consolidate the University’s collection of information
- New GMAS functionality to capture details already imbedded in the proposal and awards

Support requests by agencies and Harvard leadership
- Fulfill reporting requirements, enhance monitoring capabilities
- Substantiate University’s compliance obligations
INTERNATIONAL COLLABORATION PROJECT

- University-wide effort with school, central, and OVPR representatives
- Created standard definitions related to international collaboration and activities
- Collaborated with HUIT to develop new functionality in GMAS
  - Held end-user testing workshops
TYPES OF INTERNATIONAL COLLABORATION AND ACTIVITIES

- International Collaboration (other than subaward recipients)
- Use of Int’l Facilities/Instrumentation at an International Site
- International Shipment/Transfer/Exchange of Research Materials, Data, and/or Equipment
- International Sponsors
- International Travel
- International Human Subjects and/or Animal Research
- International Subawards
- Establishment of a New International Site

Specific to NIH

US Foreign Policy

Specific to NASA, DoD, Dept. of Energy

Foreign National
IDENTIFYING INTERNATIONAL COLLABORATION AND ACTIVITIES

**Grant Manager**
- Assumes Primary Responsibility for Identifying International Collaborations and Activities
- Enters International Collaborations and Activities data in GMAS
- Confirms inclusion of international activities in proposal documents
- Responsible for disclosing existence of international activity in response to sponsor requirements

**Central Reviewer**
- Reviews Proposal, confirming international collaborations and activities data is captured
- Submits Proposal

**Principal Investigator**
- Assumes Primary Responsibility for Identifying International Collaborations and Activities
- Responsible for disclosing existence of international activity in response to sponsor requirements

**OVPR**
- Reviews international collaborations and activities data that triggers provostial review criteria
INTERNATIONAL COLLABORATION AND ACTIVITIES: WHAT HAPPENS AT PROPOSAL STAGE?

- Replaces the current "Foreign component" yes/no question
- New initial proposals and competing renewals will include the new international collaboration and activities checklist

* Exact date TBD
INTERNATIONAL COLLABORATION AND ACTIVITIES: WHAT HAPPENS AT PROPOSAL STAGE?

• Each checklist item will include:
  • Detailed sub-questions (where applicable)
  • Selection of multiple sub-questions and multiple countries
INTERNATIONAL COLLABORATION AND ACTIVITIES: WHAT HAPPENS AT PROPOSAL STAGE?

- Enhanced on-screen help and links

Other features:
- Checklist to aid in information gathering with the PI
- Templates for central reviewers
- PI Attestation/signature language
INTERNATIONAL COLLABORATION AND ACTIVITIES: WHAT HAPPENS AT AWARD STAGE?

- The checklist can be reviewed and updated at award setup, similar to the “confirm research team” process

- All awards will require entry of the checklist before award set-up
  - There will be a “no changes” option
INTERNATIONAL COLLABORATION AND ACTIVITIES: WHAT HAPPENS DURING THE AWARD?

- International collaboration and activities can be *added* or *updated* to any award via a new request type.

- All revisions to the checklist will be stored and viewable.

- Monitoring reports will be available.
### TRAINING AND RESOURCES

#### Online Zoom Trainings
- **Mid-June (3)**
  - Central Offices: OSP, HSPH ORA, HMS ORA
- **Mid/Late June (3)**
  - Schools/Depts
- Recorded Training

#### Online Resources
- **GMAS Website:**
  - Release Info
  - Job Aids
  - Business Process Documentation
  - Data Gathering Tool
  - Central Review Checklist

#### Additional Support
- **Central Reviewers** (Pre-Award Officer or GCO)
- Working Group Representatives
QUESTIONS?

**Kelly Evans**  
Director, Pre-Award Services  
HMS Office of Research Administration

**Melissa Korf**  
Director, Grants and Contracts Administration  
HMS Office of Research Administration

**Pernille Konow**  
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HMS Office for Academic and Research Integrity