



February 15, 2021

Dear USF Faculty:

The University of South Florida is an engaged, global research university dedicated to excellence in education, research, service and outreach in Florida and around the world. USF is dedicated to creating opportunities for the global exchange of people and ideas that promote intercultural competence and appreciation, and building robust and sustainable partnerships necessary for innovative and cooperative solutions to global challenges. International research partners, students and scholars and the open exchange of ideas are imperative to the university's research and educational missions.

As a globally engaged institution, USF is mindful of the federal and state governments' heightened concerns regarding the influence of foreign governments and entities on federally funded research. The National Institutes of Health (NIH) has taken action to protect [the peer review process](#) from foreign influence and reiterate standing policies on [disclosure of Other Support](#) on grant applications. The [NIH is proactively identifying potential issues](#), contacting institutions and conducting investigations, and cases have been referred to the Department of Justice for prosecution. The [Department of Energy](#) and [National Science Foundation](#) implemented restrictions on participation in foreign government talent recruitment programs for their employees and certain contractors. The [Department of Defense](#) is taking steps to limit the diversion of intellectual property and requires Other Support reporting by key personnel on research grants. Senator Rick Scott recently sent a letter to all Florida State University System presidents requesting information on any known non-compliance with federal requirements to disclose Other Support, University processes for receiving and reviewing disclosures of outside activity with foreign entities and University penalties for faculty suspected of espionage. In addition, state legislators are taking action to ensure State University System institutions are appropriately addressing these concerns.

The federal government is focused on disclosure of researchers' relationships with foreign entities. As errors or omissions in disclosure may impact an investigator and/or the University's ability to obtain future federal funding, we are disseminating this memorandum to ensure USF researchers know how to protect themselves and their research with full transparency and prospective, timely and complete disclosures. Key information for researchers is summarized below. In addition to this memorandum, the University of South Florida has created a website that includes agency guidance, relevant USF System policies, contact information for relevant USF System offices/programs and FAQs. The website is available here: www.usf.edu/foreigninfluence.

USF Faculty
February 15, 2021
Page Two

- **USF encourages international collaborations.** USF Research & Innovation and USF World are available to assist you in assessing potential relationships with foreign entities. Researchers must also ensure they are making full, timely and transparent disclosures related to these activities. For additional information, please visit the [Export Controls](#) and [USF World](#) websites.
- **If you are contacted by outside law enforcement regarding matters related to your employment,** direct any inquiries to [USF's Office of the General Counsel](#) for guidance.
- **Fully disclose "Other Support" on grant applications.** All financial support or resources that supports active or proposed research, and all foreign activities must be disclosed in the Current & Pending Support section at the time of proposal submission. All personnel on a research project must disclose all activities—foreign or domestic—on their Biosketch. Required disclosures include affiliations or appointments at other institutions, whether or not remuneration is received, and whether full-time, part-time, or voluntary—including adjunct, visiting, or honorary. Additionally, federal sponsors require disclosure of participation in foreign talent recruitment programs as such activity meets the definition of Other Support. For assistance with reporting international relationships or activities to sponsors, contact your [Sponsored Research Administrator](#).
- **Disclose Outside Activity prospectively.** Faculty members must disclose all professional Outside Activity prior to engaging in it. This includes appointments at other entities and remuneration received from foreign academic institutions. USF Health faculty disclose through [ROAD](#), and non-USF Health faculty submit disclosures through [eDisclose](#). If you require assistance with new disclosures, or disclosures that were not previously reported please contact the [Office of Faculty Affairs](#) (USF Health faculty) or the [Office of Compliance and Ethics](#) (non-USF Health faculty).
- **In publications and presentations, accurately disclose author affiliations, conflicts of interest and research support per journal guidelines.** Submitting accurate information with manuscripts limits discrepancies between Other Support disclosed in a grant application and research support, affiliations and conflicts of interest printed in a publication.

USF Faculty
February 15, 2021
Page Three

- **Remuneration received from, and travel sponsored or reimbursed by, foreign academic institutions and governments are not exempt from research COI reporting and must be disclosed.** Federally-funded Investigators must disclose Significant Financial Interests (as defined in [USF System Policy 0-309](#)) within 30 days of acquisition or discovery on their Interest Inventory which is located within the [ARC website](#). For additional information, including how to disclose reimbursed or sponsored travel, contact the [COI Program](#) or visit the [COI Program website](#).
- **Disclose potential inventions and authored works.** All University employees must disclose inventions or other works to the Technology Transfer Office (TTO). Disclosure forms are available [online](#). For additional information, including TTO staff contacts, visit the [TTO website](#).

The University of South Florida values its research community and recognizes the significant public benefit that comes from your scientific advances and discoveries, many of which would not be possible without our international faculty, students and staff and global collaborations. As you continue to pursue your research agenda and make valuable scientific contributions, ensure you fully and accurately disclose per federal regulations, sponsor guidance and USF System policies so that all USF faculty are able to pursue and receive federal research dollars without hindrances. If you have any questions or require assistance, please visit: www.usf.edu/foreigninfluence.

Sincerely,

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