

Federal Foreign Disclosure Reporting

Recently, the issue of foreign influence and academic research has received considerable attention by federal agencies that support research in academic institutions. The federal regulatory landscape is evolving as federal agencies update their policies and regulations. It is imperative that the K-State research community stays abreast of these changes and that everyone understands what actions to take to remain compliant.

K-State supports academic freedom and is committed to maintaining an open and transparent research environment that welcomes the participation of researchers from around the world. It is equally important that we support the research enterprise by complying with regulatory requirements. The University Research Compliance Office will continue to follow these developments and update you on changes in federal regulations and policies as they happen.

The NIH in particular has expressed concerns in three areas:

1. Diversion of intellectual property in grant applications or produced by NIH-supported biomedical research to other entities, including other countries.
2. Sharing of confidential information on grant applications by NIH peer reviewers with others, including foreign entities, or otherwise attempting to influence funding decisions.
3. Failure by some researchers working at NIH-funded institutions in the U.S. to disclose resources from other organizations, including foreign governments, which threatens to distort decisions about the appropriate use of NIH funds.

Other federal funding agencies as well as intelligence and security agencies have expressed similar concerns. As these agencies publish official policies or requirements, we will be sure to update you.

It is logical to expect that this heightened sensitivity will be accompanied by equally heightened scrutiny and enforcement. We take this opportunity to remind the K-State research community of requirements, policies, and procedures already in place and that are helpful in maintaining compliance.

1. Transparency in Disclosure

- Be thorough and complete in disclosing all forms of research support and collaboration. All sources of funding including federal, state, or local government agencies; foreign government agencies; public or private foundations; industrial or other commercial organizations; and internal funds, must be disclosed. Be sure to check current sponsor's requirement as disclosure requirements may vary from sponsor to sponsor. See the links below for NIH, NSF, and DOE requirements:
 - NIH's [Other Support](#) (*Other Support includes all financial resources, whether Federal or non-Federal, commercial or institutional, available in direct support of an individuals research endeavors*).
 - NSF's [Current and Pending](#) (*All current project support from whatever source (e.g., Federal, State, local, or foreign government agencies, public or private foundations, industrial, or other commercial organizations, or internal funds allocated toward specific projects) must be listed*).

- The U.S. Department of Energy, DOE, has published a new policy document relating to contractor requirements regarding foreign talent recruitment programs- [Department of Energy Foreign Government Talent Recruitment Programs](#). The new “Order” prohibits DOE employees and DOE contractor employees from engaging in unauthorized transfer of scientific and technical information to foreign government entities, through participation in foreign government talent recruitment programs.

2. Compliance with the Export Controls Regulations

- U.S. export controls laws and regulations intersect with several research and academic activities such as conducting sponsored research, engaging in international collaborations, international travel, and visiting scholars’ program, among others. K-State maintains a robust export controls compliance program that is designed to support the research enterprise to comply with relevant federal regulations. See the [Export Controls Compliance Program Website](#) for more information.

3. Foreign Financial Interests and Export Controls Regulations

- If you will receive a salary, anything of value, or economic benefit, including sponsored travel from any foreign entity, including governments and universities, in return for services rendered or to be rendered, including fees received from private consulting or other international business activities, this must be disclosed using the [Financial Interest Received From Any Foreign Entity form](#).
- Contact URCO if you have any questions related to Export Controls or disclosing Foreign Financial Interests at comply@ksu.edu or 785-532-3224.

4. Visiting Scholars

- As a research and education institution, K-State routinely hosts visitors who come to the University for various reasons, including conducting research, participating in research collaboration, and participating in general academic and scientific meetings or presentations. URCO has developed review procedures for visitors on campus. K-State employees intending to invite or host international visitors should follow the approval process required by their department or college as appropriate. In addition, the host must complete [Export Control Compliance Review Form](#) and route it to URCO for review and approval. Please contact URCO with any questions at comply@ksu.edu or 785-532-3224.

5. Protecting Intellectual Property

- All inventions should be promptly disclosed to the [Kansas State University Research Foundation \(KSURF\)](#), and to the sponsor when required.

Sincerely,



Cheryl A. Doerr
Associate Vice President for Research, Compliance