

The United States government has recently expressed serious and growing concern that foreign entities are exercising inappropriate influence over federally-funded research. In a [letter dated August 20, 2018](#), NIH Director Francis Collins articulated concerns that:

1. Intellectual property used in or produced by federally-funded research is being diverted to foreign entities;
2. Some NIH peer reviewers have shared confidential information from grant applications with foreign entities, or have otherwise inappropriately attempted to influence funding decisions; and
3. Some researchers with federal funding are failing to adequately disclose their relationships with and activities involving foreign institutions and government entities.

While UNK encourages international collaborations, investigators must be transparent about their foreign relationships and activities. **Several federal agencies, including the National Institutes of Health and the Department of Defense, have indicated that failure to disclose these relationships and activities may compromise eligibility for funding.**

UNK's Assistant Vice Chancellor for Research, Chief Compliance Officer, Office of Research Compliance, and the Office of Equity and Compliance are available to assist in ensuring that you are properly disclosing these relationships and activities and complying with federal and institutional policies.

If you currently receive or planning to apply for federal research funding, the following best practices are designed to assist you in meeting these federal and institutional requirements:

- **Report any conflicts of interest (aka Interest and Activity Management) or commitment through the Research Portal ([researchportal.unk.edu](http://researchportal.unk.edu))**
  - Disclose your outside professional activities and financial relationships, whether compensated or uncompensated, including appointments at other institutions, speaking engagements, journal submissions, and other publications. When in doubt, err on the side of transparency.
- **Review export control requirements before collaborating, traveling, or shipping internationally.**
  - Export control regulations may require you to take additional steps, like obtaining a federal authorization, before collaborating with or accepting sponsorship from foreign entities, traveling to or hosting visitors from other countries, or shipping materials or equipment out of the United States.
- **Disclose any foreign investment or research funding to the Office of Sponsored Programs (OSP) and on all federal grant applications and reports.**
  - The OSP website has policies and other information on making these disclosures.
- **Protect your intellectual property (IP).**
  - Disclose any potential IP early to NU Tech Ventures in conjunction with UNK's Assistant Vice Chancellor for Research, and discuss any plans to meet with foreign investors that might include existing or potential IP.
- **Register your trip in Concur before traveling internationally.**
  - Registration in Concur will help you meet the requirements of the [University of Nebraska Travel Policy](#).

Consequences for failing to comply with disclosure requirements can be severe, including debarment from future federal funding. Similarly, violations of federal export regulations can result in criminal penalties, including imprisonment and significant fines.

We encourage all members of the UNK community to be mindful of these requirements and to disclose any relationships with or activities involving foreign entities as soon as possible.

If you have any questions about these requirements or resources, please contact:

Richard Mocarski  
Assistant Vice Chancellor for Research

Mary Chinnock Petroski  
Chief Compliance Officer

Lee Ann Purdy  
Export Control Manager