



Office of Sponsored Programs

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To: OVPRI employees, Academic Deans, Associate Deans for Research, Institute Directors, Department Heads Council, Faculty Senate

From: G. Don Taylor, Interim Vice President for Research and Innovation

Foreign influence that threatens the integrity of the research enterprise in the United States is a growing concern for federal agencies. Despite this concern, Virginia Tech remains committed to its strategic plan to continue its growth as a comprehensive global land-grant university. Virginia Tech values and encourages international research, collaboration, and scholarship where global citizens engage with different ideas, beliefs, perspectives, experiences, identities, backgrounds and cultures. Virginia Tech is equally committed to meeting regulatory compliance in all areas of our education and research activities so that we are responsible stewards of public and private funding.

While external activities including foreign collaborations are encouraged, the integrity of the institution and its research depends on a high degree of transparency regarding relationships with outside entities. Of particular concern are those relationships of individual researchers with foreign governments and other foreign entities that are not disclosed to the institution or to the federal agencies that support work at Virginia Tech. Researchers are required to fully disclose receipt of substantial resources from other organizations (including foreign governments), financial conflicts of interest, and appointments at foreign institutions, as well as other support that may negatively impact their primary commitment to their role at Virginia Tech or funding decisions of a federal agency. Failure to disclose could result in loss of funding or, in extreme case, termination of employment.

The National Institutes of Health Director, Dr. Francis Collins, expressed the following areas of concern in a memo to the research community:

1. Diversion of intellectual property (IP) 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; and
3. Failure by some researchers working at NIH-funded institutions in the U.S. to disclose substantial resources from other organizations, including foreign governments, which threatens to distort decisions about the appropriate use of NIH funds.

While NIH has taken a lead regarding this matter, other federal agencies, including the Departments of Defense and Energy and the National Science Foundation, are providing guidance and clarifications regarding foreign influence.

In an effort to support Virginia Tech's researchers, a task force has been established to monitor and manage this situation. Representatives from the following offices and divisions are involved with the task force: Division of Scholarly Integrity and Research Compliance, Office of Sponsored Programs, Office of Export and Secure Research Compliance, University Legal Counsel and the Office of Audit, Risk, and Compliance.

If you have questions regarding this matter please direct them to the following:

- Pre Award Associate - Questions regarding proposal submissions and completion of biosketches and current and pending forms
- Conflict of Interest Program – Questions regarding disclosure of foreign support and activities
- Contract and Agreement Team OSP – Questions regarding contract related issues

Additional information will be provided as federal agencies provide guidance and regulations related to this matter.

Useful Resources: •

- Francis S. Collins, M.D., Ph.D.: [“Statement on Protecting the Integrity of U.S. Biomedical Research.”](#) August 23, 2018
- Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components:
<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html>
- National Science Foundation Dear Colleague Letter: Research Protection:
https://www.nsf.gov/pubs/2019/nsf19200/research_protection.jsp
- Department of Energy Foreign Government Talent Recruitment Programs:
<https://www.directives.doe.gov/directives-documents/400-series/0486-1-border/@@images/file>
- Undersecretary of Defense for Acquisition and Sustainment [“Actions for the Protection of Intellectual Property, Controlled Information, Key Personnel and Critical Technologies.”](#) March 20, 2019