

Guidance for International WU graduate students conducting research outside the U.S.

In some circumstances, a School may determine an international WU graduate student can pursue their academic training program while located outside of the U.S. If the student needs to conduct research as part of their training, certain details must be addressed to ensure compliance with regulatory requirements. Schools should address the following elements when considering the student's engagement in research and work with the applicable offices as appropriate based on the activities.

Research Location and equipment

- Ensure there is an adequate and proper location for the student to complete research, examples include:
 - If the work can be completed from their residence (e.g. computer based), follow standard practices for working remotely
 - If field based research, standard practices and rules apply (e.g. Local approvals may be required). Institutional approvals may be needed depending upon activity (e.g. IACUC, IRB, Export Controls, IBC); ensuring proper health and safety measures (e.g. OHS/student health)), etc.
 - If some type of facility use or laboratory setting is needed, likely a “host” institution will be needed. Contact the [Joint Research Office for Contracts \(JROC\)](#) to discuss what agreement may be needed to address things like:
 - Who is responsible for the student's activities? What type of oversight of the student is appropriate? How will proper health and safety measures be established and maintained?
 - Will the host institution require financial support for their oversight, supplies, etc.?
 - The host institution may require ownership of intellectual property or materials, which can be addressed through an agreement.
 - If activities are related to federal funds, the agreement may need to include applicable regulatory requirements
 - Note: restricted party screenings for the host institution and mentor will be handled through this process
- Ensure equipment or materials (e.g. biological or chemical samples/materials) needs are addressed; current standards apply including review by [Export Controls](#) and [EH&S shipping training](#), when applicable. Contact [EH&S](#) for guidance.

Management of Research Data and Materials

- Identify and navigate potential data and materials risks (e.g. confidentiality, IP protections, and appropriation). Some countries perspective on who owns data and materials that enter their country do not align with U.S. standards.
 - Faculty should be informed of risks to data/IP
 - Student should be informed of institutional standards on confidentiality of data, intellectual property, and systems security:
 - Confidentiality: ensure student understands responsibilities for maintaining confidentiality of research data and address appropriate and inappropriate scenarios for sharing/communicating data
 - Outline any expectations or requirements around the protections of intellectual property
 - Systems security: refer to [Information security policies and standards](#)
- Address system security to protect research data and manage access; develop a plan with Information Security by completing an [information security risk review](#). Be sure to identify any data the student does not need or should not have access to or is prohibited from downloading onto their personal devices.

OISS Communications

- Follow standard communication processes. Through those processes, any student who gets a Form I-20, “Certificate of Eligibility for Nonimmigrant Student Status.”, will be appropriately documented by OISS and be screened through the restricted party screening process.

Human Studies and/or access to Human Studies Data

- For human studies research, standard WU IRB requirements apply to WU students regardless of location.
- Utilize the [international research prep checklists](#) prior to the submission to the IRB.
- Determine if the mentor/PI will transmit or provide access to any human studies data (PHI or de-identified)
 - For creating or providing access to protected health information (PHI), develop a plan/access that complies with WU’s HIPPA standards: <https://it.wustl.edu/telecommuting/wusm-telecommuting/>. If the PHI is not secure in accordance with University standards, then the activity cannot be allowed.
 - Be aware that foreign government requirements may differ from WU standards (e.g. the EU considers some data as protected health data where WU would consider it de-identified), which the IRB will evaluate.

Animal Studies

- For field studies, standard requirements apply. If the PI cannot be on location with the student, the IACUC may require additional details regarding the student’s oversight and training to assess whether the activity satisfies regulatory requirements. Note: students are not allowed to be a PI of an animal studies protocol.
- If the student intends to work on an animal study at another institution, that institution must approve and take responsibility for those activities; refer to host institution process above.

Research activities potentially related to Federally Funded Research

- If the student’s research activities are related to the scope of an investigator’s federally funded research (regardless of whether the student is paid), then the activity may need to be reported to the sponsoring agency for prior approval.
 - Identify and document the specific research (project and sponsor) in which the student may be engaged
 - Review the agency’s reporting requirements specific to their activities by referring to the agency’s awarding policies and/or contacting the program officer. It is recommended that the program officer be contacted to ensure agency requirements are being met. Some agencies are making reporting and approval exceptions for students needing to work remotely from a foreign country due to COVID-19 travel restrictions.
 - If the student’s mentor is engaged in research funded by the DOD/DOE/NASA, consult with [export controls](#) to ensure no other requirements need to be addressed.
 - Additional resources are also available at WU’s [Disclosure and Reporting Requirements for International Research Partnerships and Collaborations](#).

Financial support for students using research funds

- Current standards for supporting WU students using research funds must be followed. For example, paying a stipend from federal research funds is generally not permitted (e.g. NIH R01s) unless training costs (e.g. a NIH T32 or F31) are clearly identified as allowable by the agency. The amount of salary to be charged should be commiserate with the work being performed; submission of an e-PARs will be required. If the student is not able to perform the work due to their location, their salary should not be paid from the grant.
- Review eligibility requirements issued by the funding agency to ensure the student is eligible to be sources to the funding; some agencies may allow for deviations related to COVID-19.
- Foreign component reporting requirements may apply when a student is being supported by federal research funds and conducting research outside the U.S., which must be approved by the federal agency prior to engaging in the activity (see previous section).