

Interim guidance for internal reporting of outside professional activities with a foreign entity

The U.S. Government continues to show increasing concern surrounding foreign influence and international activities in academia. Federal agencies are establishing reporting requirements related to engagement in outside professional activities and emphasizing the institution’s responsibility for reviewing these relationships and ensuring compliance with agency requirements.

Currently, all faculty report any personal financial relationships with outside entities under the financial COI policies. However, evolving agency reporting requirements are focusing on relationships, personal benefits and professional appointments and other support, regardless of direct remuneration. Agencies expect complete transparency for disclosing outside activities in grant applications and progress reports and the Institution’s assurance of review and accuracy.

While the institution is developing a solution that most effectively supports these requirements and continues to monitor changing agency expectations, the departments should take interim steps to collect and review outside professional activities currently receiving a high level of federal scrutiny. Activities involving foreign entities are considered the highest risk and the focus of this guidance; however, the school/department may also want to collect information about domestic activities in these categories to fully align with all agency reporting requirements.

Applicable to: Individuals who are a PI, senior/key personnel or intend to apply for federally funded research

Foreign entity: is any foreign government, non-profit, for-profit, university/academic organization

Outside Professional Activities to Report and Review

1. Outside appointments, relationships, and research activities with foreign entities
a. All academic, professional, scientific, or institutional appointments; includes any form of employment or engagement, research oversight, teaching courses or student advisory activities
b. All resources and other support for ongoing research projects conducted at or on behalf of another institution/entity (see below for in kind contributions); this includes a paid or unpaid PI/Co-investigator role on behalf of another organization/entity and research performed under a personal agreement
c. Participation in an effort directly or indirectly organized, managed, or funded by a foreign government to recruit science and technology professionals or students (regardless of citizenship or national origin, and whether having a full-time or part-time position). Personal benefits from this type of relationship could take many forms including cash, research funding, complimentary foreign travel, honorific titles, career advancement opportunities, promised future compensation, or other types of remuneration or consideration, including in-kind compensation.
2. In-Kind Contributions/support from foreign entities that include:
a. Resources, or other financial support, for equipment or supplies that support WU research
b. Office/laboratory space, equipment, supplies that support any external research activities
c. Visiting researchers, post-docs, graduate students or other personnel from other universities or who are funded by foreign entities, that are engaged in WU research activities (e.g. a foreign government or institution providing any salary, stipend, or living expenses directly to the research personnel, not through WU)
3. Exclusions (when considered alone, are not activities that need to be reviewed; however, they may still need to be reported to a federal agency)

a. Research collaborations that are not directly contributing to the specific aims/research plans of your WU research portfolio
b. Activities/support specifically related to implementing a federally funded international collaboration awarded to WU
c. Support for trainees, or graduate or undergraduate students enrolled in a WU educational program

Reporting Guidance

Individual's should disclose the above activities to a designated reviewer; refer to the [example disclosure form \(Word doc\)](#) for details.

Designees: School designees should be individuals who are responsible for (a) Faculty appointments, salaries, and promotions; and (b) resource allocations necessary to support research activities to ensure they have the authority and expertise to review and address these relationships. This would typically be department chairs or divisions heads at the school of medicine.

Designated Reviewer Guidance

Assess for conflict of commitment: Designees should review each OPA and assess if there is potential conflict of commitment. A conflict of commitment is a situation caused when an individual undertakes OPAs that may interfere with his or her primary obligations and commitments to the University in terms of time, responsibilities, resources, and loyalty, even if the outside activity is valuable to the university or contributes to professional development and competence. This includes situations in which the external commitments create an overlap of resources between WU and the external entity, or actions of the individual indicate a prioritization or loyalty to external activities resulting in a potential detriment to the University, including students, colleagues or patients. Funding agencies are particularly interested in the potential for scientific or resource overlap.

Other Considerations:

- To help faculty establish personal activities that best position them to comply with agency or university requirements, the school or department should consider establishing a prior approval process for all academic, professional, scientific, or institutional appointments and evaluate whether the individual's personal agreement aligns with the [Guidance for Personal Agreements with Foreign Entities](#).
- Many federal funding agencies are emphasizing the institution's responsibilities to assure the accuracy of an individual's other support/current and pending report. Funding agencies may also require submission of an individual's personal agreement (translated) with a foreign entity and an assurance the institution reviewed for overlap with the individual's reported activities. The department/designee may be asked to address requests from the Office of Sponsored Research Services (OSRS) when additional information is needed regarding the individual's report as it relates to the overlap statement and the terms of any applicable personal agreements in order for OSRS to provide the institutional assurance required by an agency.

Designees' documentation of the review:

- Summarize the basis for determination, whether there is a conflict of commitment or potential research overlap; if the situation creates a conflict, document how it was addressed.
- Confirm the relationship complies with:
 - [Guidance for Personal Agreements with Foreign Entities](#) (when applicable) by reviewing a translated version of the individual's personal agreement.
 - [Consulting Privileges Policies](#) (when applicable)

Questions can be directed to the Office of Research Integrity and Ethics ORIE@wustl.edu/ [314 747-6253](tel:314-747-6253).