



Research Administration Forum: Disclosing Outside Activities

Craig Allison, JD, MPH

Director, Research Compliance and Integrity



International Relationships and Activities at UC Davis

Commitment to Nondiscrimination

The UC non-discrimination policy states that the university does not discriminate and prohibits discrimination based on a protected classification, and generally does not accept sponsors' restrictions of research based on citizenship. UC Davis is committed to continuing and building important and successful relationships and collaborations with foreign colleagues and institutions. The U.S. government has identified threats to national security – the academic freedom and open exchange of ideas that is essential to the mission of the university creates a unique set of risks.

It is important that all UC Davis personnel protect the integrity of our resources through consistent and complete disclosure and reporting of international research, scholarly, and outside activities through all appropriate channels.



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<https://grants.nih.gov/grants/faq-other-support-foreign-components.htm#5934>

7. What should I do if I'm not sure if something needs to be included as Other Support?

In the interest of full transparency, recipients should err on the side of disclosure. Researchers should consult with their institutional officials for guidance to ensure compliance with institutional and NIH policies. NIH requires complete and accurate reporting of all sources of research support, financial interests and affiliations, both foreign and domestic.

DOCUMENT



International Relationships and Activities at UC Davis (four main areas)

Ensuring Compliance (Related but Separate – Yes, may be overlap!)

- Research Sponsor/Grant Disclosure Requirements
- Financial Conflict of Interest (COI) Disclosure Requirements in Research
- Conflict of Commitment (COC) Disclosure Requirements (“Outside Activity Reporting”)
- Export Control Compliance Requirements

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Research Sponsor/Grant Disclosure Requirements

Several government agencies (Mainly NIH and NSF) have recently released new/updated information and "guidance" about disclosure and reporting of international relationships as part of the contracts and grants submission process. Disclose to your sponsor if:

1. You have or may receive research support from anyone else for any of your research endeavors/projects, **regardless** of whether this projects relate to the research you are conducting for these sponsors (e.g. "current and pending" or "other" support in applications, biosketches, JIT materials, or RPPR). **Note that support is not just financial, and can include (but are not limited to) research or laboratory personnel, lab space or scientific materials.**
2. You or any of your research personnel perform on the project outside of the United States (e.g. "foreign component").
3. Any foreign entity is supporting or making payments to any foreign scholars or students who are key personnel related to your project (e.g. "foreign affiliation").

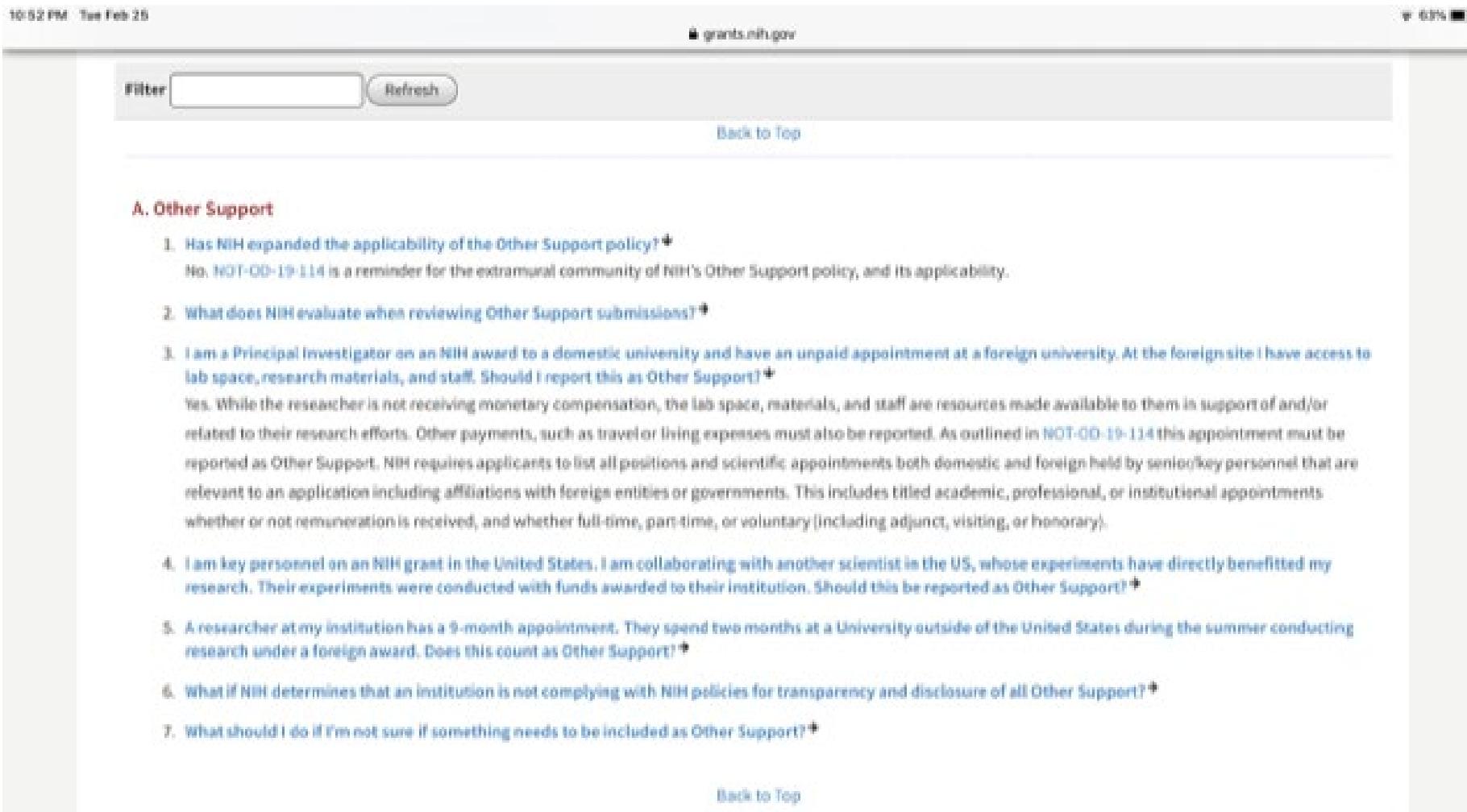
Please check the Office of Research website for updated guidance, sponsor-specific policies, definitions, and FAQs, **especially if you are sponsored by the NIH, NSF, DoD, or DoE.**

Call us if in doubt at all!



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<https://grants.nih.gov/grants/faq-other-support-foreign-components.htm#5934>



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A. Other Support

1. [Has NIH expanded the applicability of the Other Support policy?*](#)
No. NOT-OD-19-114 is a reminder for the extramural community of NIH's Other Support policy, and its applicability.
2. [What does NIH evaluate when reviewing Other Support submissions?*](#)
I am a Principal Investigator on an NIH award to a domestic university and have an unpaid appointment at a foreign university. At the foreign site I have access to lab space, research materials, and staff. Should I report this as Other Support?*
Yes. While the researcher is not receiving monetary compensation, the lab space, materials, and staff are resources made available to them in support of and/or related to their research efforts. Other payments, such as travel or living expenses must also be reported. As outlined in NOT-OD-19-114 this appointment must be reported as Other Support. NIH requires applicants to list all positions and scientific appointments both domestic and foreign held by senior/key personnel that are relevant to an application including affiliations with foreign entities or governments. This includes titled academic, professional, or institutional appointments whether or not remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary).
3. [I am key personnel on an NIH grant in the United States, I am collaborating with another scientist in the US, whose experiments have directly benefitted my research. Their experiments were conducted with funds awarded to their institution. Should this be reported as Other Support?*](#)
5. [A researcher at my institution has a 9-month appointment. They spend two months at a University outside of the United States during the summer conducting research under a foreign award. Does this count as Other Support?*](#)
6. [What if NIH determines that an institution is not complying with NIH policies for transparency and disclosure of all Other Support?*](#)
7. [What should I do if I'm not sure if something needs to be included as Other Support?*](#)

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Relevant Sections of the NIH RPPR

D1. “WHAT INDIVIDUALS HAVE WORKED ON THE PROJECT?”, section “Foreign Org”

D.2.d “Changes in Other Support”

G.9 “FOREIGN COMPONENT”



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Financial Conflict of Interest (COI) Disclosure Requirements in Research

Ensure that all federal- and state-mandated financial conflict of interest disclosures are made in a timely fashion.

The disclosure requirements vary by funding source.

Note that foreign governments and foreign institutions of higher education are not exempt from financial COI disclosure requirements.

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Financial Conflict of Interest (COI) Disclosure Requirements in Research: NIH

Anyone related to the proposed project who is responsible for the design, conduct or reporting (“investigator”) must disclose:

“... their Significant Financial Interests (and those of the Investigator’s spouse and dependent children) that appear reasonably related to the Investigator’s institutional responsibilities...”

A Significant Financial Interest is:

“A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator’s spouse and dependent children) that reasonably appears to be related to an Investigator’s institutional responsibilities: ... include[ing]... salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest... [and] intellectual property rights and interests (e.g. patents, copyrights)...”

NIH Threshold: \$5,000 (\$0 for equity in non-publically traded companies)

NIH Investigators must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator).

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Financial Conflict of Interest (COI) Disclosure Requirements in Research: NSF

Anyone related to the proposed project who is responsible for the design, conduct or reporting (“investigator”) must disclose:

“... all significant financial interests of the investigator (including those of the investigator’s spouse and dependent children): (i) that would reasonably appear to be affected by the research or educational activities funded or proposed for funding by NSF; or (ii) in entities whose financial interests would reasonably appear to be affected by such activities.”

A Significant Financial Interest is:

“...anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interest (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g. patents, copyrights, and royalties from such rights).”

NSF Threshold: \$10,000

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Conflict of Commitment (COC) Disclosure Requirements (“Outside Activity Reporting”)

In addition to mandatory COI reporting, you must disclose all of your outside professional activities, **whether paid or unpaid**, through the UC Davis Outside Activities Reporting System (OATS). Please note that many of these activities require formal approval prior to undertaking the activity. For example:

- Teaching, research or administration of a grant at (or a related affiliation with) an educational institution, organization, government agency, foundation, or other entity outside of the University;
- Employment outside of the University;
- Assuming a founding or co-founding role of a company;
- Assuming an executive or managerial position outside of the University.

Guidance regarding COC can be obtained by consulting Academic Affairs or the applicable policy

- **UCD Main Campus – APM025:** Conflict of Commitment and Outside Activities of Faculty Members
- **UCDHS – APM671:** Conflict of Commitment and Outside Activities of Health Sciences Compensation Plan Participants



International Relationships and Activities at UC Davis

Export Control Compliance

Contact the UC Davis Export Control Officer to determine if your activity is permitted and/or requires a license from the federal government. Activities potentially requiring a license could include:

- Sharing controlled technology with a foreign person overseas or in your lab;
- International research collaborations;
- Traveling to embargoed or comprehensively sanctioned countries;
- Shipping research materials overseas.

Up-To-Date Information Can Be Found On The OR Website

The screenshot shows the UC Davis Office of Research website. The URL in the address bar is <https://research.ucdavis.edu/policiescompliance/international-relationships-and-activities/>. The page title is "International Relationships and Activities". The main content area discusses the following guidance prepared by UC Davis to ensure that research and educational activities at UC Davis are compliant with federal requirements, specifically relating to disclosure of foreign influence. It includes links to UCOP Resources Regarding Foreign Influence and a Letter from UC President Napolitano regarding international relationships and activities. The page also features a sidebar with links to various policies and regulations, and a footer with the UC Davis Office of Research logo.

https://research.ucdavis.edu/policiescompliance/international-relationships-and-activities/

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International Relationships and Activities

The following guidance has been prepared by UC Davis to ensure that research and educational activities at UC Davis are compliant with federal requirements – specifically relating to disclosure of foreign influence. It includes a supplement [guidance from the University of California Office of the President \(UCOP\)](#).

- [UCOP Resources Regarding Foreign Influence](#)
- [Letter from UC President Napolitano regarding international relationships and activities](#)

Background on Increased Federal Scrutiny

UC Davis remains committed to continuing and expanding our international research collaborations with our foreign colleagues and partners. However, we have identified threats to our national security in the international research arena. Specifically, the academic freedom and open exchange of ideas that are the hallmark of our university also creates a unique set of risks. The university must maintain the integrity of our resources through consistent oversight of our international relationships and activities through all appropriate channels.

POLICIES & REGULATIONS

- IRB ADMINISTRATION
- ANIMAL CARE PROGRAM
- BIOLOGICAL SAFETY
- EXPORT CONTROLS IN RESEARCH
- INDIVIDUAL FINANCIAL CONFLICTS OF INTEREST (FCOI) IN RESEARCH
- HUMAN ANATOMICAL SPECIMEN & TISSUE OVERSIGHT
- RESEARCH ETHICS: RCR PROGRAM
- RESEARCH MISCONDUCT
- STEM CELL RESEARCH

INTERNATIONAL RELATIONSHIPS AND ACTIVITIES



Questions?

