FAQ for International Research Activities and Collaborations

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Disclosures to Funding Sponsors

1. **What international activities do I need to disclose?**

   Sponsors expect you to disclose any significant activities on a project outside the United States, either by you as an investigator, by key personnel on the sponsored project, or by a researcher employed by a foreign organization, *whether or not grant funds are expended*.

   Examples include:

   - Collaborations with investigators at a foreign site anticipated to result in co-authorship;
   - Use of facilities or instrumentation at a foreign site; or
   - Receipt of support or resources from a foreign entity.

2. **What qualifies as "Current and Pending Support" or "Other Support"?**

   All financial resources available in direct support of an individual's research endeavors must be disclosed to sponsors. Disclose financial resources even if they relate to work that is performed outside of a researcher's appointment period.

   For example, if a researcher with a 9-month appointment spends two months at a university outside of the U.S. during the summer conducting research under a foreign award, disclose that activity to the sponsor.

   Specific instructions are found in NIH's Other Support, NSF's Current and Pending Support, and similar documentation from other sponsors.

3. **What do I do if a researcher from a foreign country wants to include me as a co-PI in a sponsored project in their country?**

   Disclose the foreign sponsored project in your Current and Pending or Other Support for all new proposal submissions.

   If you need to update a submitted proposal, notify the sponsor with information regarding the project with foreign funding using "Just-In-Time Procedures."

   If support for the international project is obtained after you have been awarded a federally funded project, disclose the details of the international project in the annual report to the federal agency.

4. **I will have a visiting scholar in my lab whose salary is supported by a foreign university. Do I need approval before the scholar can work on my federally funded research?**

   Maybe. Discuss with your Grants Management Officer or Contracting Officer whether formal approval is required.

5. **How do I correct disclosures of international activities or support in pending proposals?**

   If a PI identifies an omission or error in a pending proposal, the PI should contact Andrea Rich, Pre-award Manager, Office of Sponsored Projects Administration (arich@iastate.edu, 515-294-4642)) for assistance in correcting the error.

   To correct disclosures for active awards, contact Tammy Polaski, Associate Director, Office of Sponsored Programs Administration (tra@iastate.edu, 515-294-0983).

   The investigator with the conflict should also update their Conflict of Interest and Commitment Disclosure with ISU.

6. **What do I need to include in my biosketch?**

   Agencies are looking more closely to ensure that all relationships are disclosed in biosketches. It is important to keep your biosketch current and to include all academic and professional appointments, whether the appointment is paid or unpaid.

Disclosures to ISU

7. **What international collaborations and affiliations do I need to disclose to ISU?**

   It is important to disclose all international professional activities and financial relationships in your annual Conflict of Interest and Commitment Disclosure, *even if they relate to work that is performed outside of your appointment period*.

   Disclosures regarding international activities and financial relationships must include:
   - Any current or former affiliation in a government-sponsored foreign talent program;
   - All work for foreign institutions of higher education or the government or quasi-governmental organization of another country, whether paid or unpaid;
   - All titled positions, recognition, or status with an institution (e.g. university, business, government, laboratory) outside the United States;
   - Collaborations with investigators outside the U.S. anticipated to result in co-authorship.

International Travel

8. **Do I need approval from my sponsor for international travel?**

   First, check to make sure international travel is allowable on your project. Even when permissible, agencies and other entities that fund your work may require advance approval and/or disclosure of foreign travel or domestic travel sponsored by foreign entities.

9. **What considerations should I take when traveling internationally?**

   If your travel is for ISU business, complete an [International Travel Registration](#).

   Based on this registration, you may receive an email stating that you are traveling to a high-risk country with federal export control restrictions that limit what you can take into the country or require a special license to carry this information. A violation of these restrictions can have significant consequences.

   If you are traveling to a country that has export control restrictions, it is important that you do not take any restricted hardware, software, data, or information with you. To protect yourself and others, please take the following actions:

   - Contact your college or IT Security for a clean loaner laptop.
   - Contact ISU's [Export Control](#) program to evaluate whether the technology/information you plan to bring with you requires a federal export license.

   Review Iowa State University's [Foreign Travel Guideline](#) if traveling with an ISU computer.

Export Compliance

Export control refers to a set of federal regulations that restrict the movement of materials, ideas or intellectual property, or people from the US to specific countries deemed to pose a national security risk.

10. **When should I contact the Export Control program?**

    The Export Control program can assist you any time you plan to do any of the following:

    - Collaborate with international partners abroad
    - Make international financial payments to a party in a country sanctioned by [OFAC](#)
    - Ship materials outside the United States
    - Transfer technology (e.g. email blueprints or photographs of a commercial aircraft turbine engine or blade to a collaborator in Canada).
    - Travel abroad
    - Use restricted materials for research, including, but not limited to human, animal, and plant pathogens, magnetic materials, propellants, and certain metal alloys.

Intellectual Property

11. **How do I ensure I meet federal sponsor rules regarding intellectual property?**

    Research discoveries with the potential to be patented or that have a commercial purpose must be promptly disclosed to the [Iowa State University Research Foundation (ISURF) to ensure](#) any potential inventions or other intellectual property are appropriately captured and protected.

    This includes any and all inventions formulated in an inventor's mind to solve a specific problem and enabling one skilled in the art to carry out the formulation to achieve the desired result in whole or in part in the course of your University responsibilities or with more than incidental use of ISU resources.

Please remind your group members to disclose potential inventions as well.

ISURF will ensure the required reporting of the inventions to federal sponsors.

Peer Review

12. **What breaches of peer review integrity are federal agencies worried about?**

Federal agencies have grown concerned over a growing number of instances of the following breaches of peer review integrity:
- Sharing proposal applications with others, including with foreign entities
- Reviewers sending funding applications to their postdocs or students to write their critiques
- Reviewers revealing that they reviewed a particular application
- Reviewers disclosing how another reviewer scored an application
- A principal investigator (PI) approaching a reviewer to discuss their submitted funding proposal

13. **How can I help ensure integrity in the peer review process?**

Do not share information gained through peer review processes, whether reviewing grant applications or publications. This information is confidential.

Declare all competing or conflicting interests when agreeing to serve as a reviewer.

Check the requirements of the relevant agency or journal. If in doubt, disclose or ask the agency or journal whether a relationship should be disclosed.

Potentially discriminatory or harassing behavior

14. **How can I report behavior that I believe to be discriminatory or harassing?**

If you experience or witness any behavior that you believe to be discriminatory or harassing based upon race, ethnicity, national origin, or any other protected classification, you should report such conduct to the Office of Equal Opportunity (eooffice@iastate.edu, 515-294-7612 or hotline 515-294-1222, or online).

International Visitors to ISU

15. **What steps are necessary to host an international visitor?**

All international visitors who visit Iowa State University for any period of time and make use of university services and process or have a university ID assigned to them is required to register with the International Students and Scholars Office (ISSO) and have a Participation Agreement Form on file with the Provost's Office.

Note that if ISU is sponsoring a visa for the visitor, an Export Control Worksheet is also required prior to processing the visitor's paperwork.