

TO: Rossier Faculty

FROM: Lawrence Picus, Associate Dean for Research and Faculty Affairs

SUBJECT: Foreign Disclosures

DATE: August 12, 2020

Please find below a News Flash from the USC Department of Contracts and Grants (DCG) regarding disclosure of international collaborations. In recent years the Federal government has been very aggressive in auditing international financial relationships between international (non-US) entities and university faculty who receive Federal funding. It is essential that you disclose any and all international remuneration or involvement as described below. It is our understanding that penalties have included prison terms for faculty and loss of funding for schools and universities far beyond the unit of the individual faculty member.

If you have any questions about what to disclose after reading the memo and reviewing the chart that is included, please contact Larry Picus or Deb Karpman who can help you determine the best course of action.

Thank you for your attention to this very important issue.

**DEPARTMENT OF
CONTRACTS & GRANTS**
YOUR PARTNER IN RESEARCH ADMINISTRATION

NewsFlash!

Announcement: The University of Southern California is engaged in far-reaching, global research and learning programs and recognizes the importance of these international collaborations. As research and learning programs are becoming ever more global, federal sponsors are placing increased emphasis on the disclosure of foreign affiliations and source of support. The below information aims to assist faculty in ensuring relationships with foreign entities comply with federal disclosure requirements.

What Needs to be Disclosed?

- Any remuneration received from (i) a foreign institution or affiliated research institute; (ii) a foreign academic teaching hospital or medical center; (iii) the government of a foreign country (which includes local, provincial, or equivalent governments); and/or foreign for-profit and non-profit businesses.

- Involvement or selection in a Foreign Talent Recruitment program, whether or not any remuneration is received.
- Foreign Funding, Appointments and Other Activities, regardless of whether they include any remuneration or are based at USC, including:
 - All positions/appointments outside USC, domestic or foreign, including full-time, part-time, visiting, adjunct, honorary or voluntary appointments;
 - Activities at foreign entities including summer months and/or sabbaticals.
 - Extramural funding, including gifts, from USC or another organization;
 - “In-kind” support received from an entity (e.g., office/laboratory space, equipment, supplies, personnel (including visitors who are supported by their home institution), and scientific materials).
- Foreign components of federally funded research, which includes any significant scientific element of a project that occurs outside the United States, whether or not grant funds are expended. Examples include:
 - Collaborations with investigators at a foreign entity that may result in co-authorship;
 - Use of facilities or instrumentation at a foreign site; and/or
 - Receipt of financial support or resources from a foreign entity.

How Should Disclosures be Made?

- In Proposals, Progress Reports, and Final Reports:
 - Identify all Performance Site(s) where work will be performed, domestic and abroad.
 - Biosketch: Identify all appointments at foreign entities, participation in foreign talent program(s) and all foreign relationships and activities.
 - Current & Pending Support: Identify all financial resources, domestic and foreign, supporting your research.
 - Foreign components: Identify all known foreign components to a research project in the initial proposal and update as necessary via subsequent progress reporting.
- During the Award:
 - If a foreign component arises during the life of the award and was not disclosed in the initial proposal, obtain sponsor’s approval through a progress report or stand-alone request.
- At the University:
 - All research activity at another institution requires disclosure and approval from the appropriate Dean and the Vice President of Research.

- Academic titles at other institutions (foreign or domestic), including full-time, part-time, visiting, adjunct, honorary, or voluntary appointments, require disclosure and approval of the Executive Vice Provost after recommendation from the applicable Dean.
- All HHS-supported faculty must annually disclose all outside activities that relate to USC responsibilities via diSClose (disclose.usc.edu).
- All researchers regardless of sponsor must make disclosures of outside activities that create a potential conflict of interest via diSClose.

Questions? Please consult with the Office of Culture, Ethics, and Compliance (compliance@usc.edu or 213-740-8258) if you need assistance in determining whether or not to disclose commitments or other support to a sponsor.