

Research Security & Transparency: Northeastern University Faculty Guidance

All users should note: Northeastern screens all entities, domestic and foreign in order to assess our legal ability to transact with the entity, as well as for potential risk. If there are any concerns about the entity, NU-RES Research Compliance or University Compliance will reach out to you to discuss the applicable issues further.

Low Risk: these activities do not require *additional* university or college approval (e.g. relevant policies and processes still apply). The Additional Steps column provides recommendations related to additional required disclosures or actions. If there is an entity-specific concern, a compliance officer will reach out to you.

Situation	Additional steps, as applicable
Proposal submission to or receipt of an award/subaward from a foreign university or company.	<ul style="list-style-type: none"> Please be aware that if a foreign university or company raises red flags (i.e. debarment, suspension or government prohibitions), NU-RES Research Compliance may contact you and your dean for additional review and discussion. <u>Reminder:</u> Proposal submissions require college and institutional approval.
A foreign entity (university, government, industry, or foundation) reimburses your travel costs, pays an honorarium or otherwise supports your participation in a conference or to deliver a lecture.	<ul style="list-style-type: none"> You are required by the Policy on Conflict of Commitment and Interest to disclose such support. Visit eCD to update your disclosure.
Unpaid research activities with a foreign research laboratory—typically at a university. Review and approval may be required based on intellectual property considerations.	<ul style="list-style-type: none"> Review the Patent and Copyright Policy in the Faculty Handbook. Contact cri@northeastern.edu with any questions.
Effort, compensation, or credit relating to foreign research is disclosed in current and pending/other research support reports or via publications. Disclosure accurately describes work done/effort expended or support provided in line with funding agency and University policy and appropriate authorship guidelines.	<ul style="list-style-type: none"> <u>Recommendation:</u> list Northeastern University first, as it is your primary appointment. <u>Reminder:</u> progress reports require college and institutional approval.
You participate in <u>paid</u> research in a foreign country.	<ul style="list-style-type: none"> This must be disclosed as current and pending or other research support and includes grants or any other research-related financial support. <u>Reminder:</u> proposals and progress reports require college and institutional approval.
You participate in <u>unpaid</u> research in a foreign country.	<ul style="list-style-type: none"> If you are named investigator at another institution, the project should be disclosed on your biosketch/cv. Any resulting publications must include your Northeastern affiliation.

MEDIUM RISK: activities requiring further discussion with either college or university leadership and in some cases, additional approvals. Recommendations, additional steps and related policies/guidance are provided in the right column.

Activity	Additional Steps
<p>You would like to participate in a research project with a foreign university as consultant and be paid directly by the foreign entity.</p>	<ul style="list-style-type: none"> • Seek prior approval from your college dean’s office. • This must be disclosed as current or pending or other research support in proposals or progress reports. • You are required by the Policy on Conflict of Commitment and Interest to disclose such support. Visit eCD to update your disclosure.
<p>You forgot to disclose a financial interest, foreign or domestic. If the non-disclosed interest constitutes an fCOI, a retrospective review of the research to check for bias is typically required.</p>	<ul style="list-style-type: none"> • Visit eCD to update your disclosure as soon as possible, there is an option to amend your disclosure in the portal. • See the Policy on Conflict of Commitment and Interest and the Policy on Financial Conflicts of Interest Related to Research for additional details.
<p>An academic appointment is conferred at another institution, foreign or domestic.</p>	<ul style="list-style-type: none"> • Seek prior approval from your college dean’s office, including a clear picture of extent of the commitment and include any written agreements.
<p>Recruitment into a foreign “talents” program (e.g., 1000 Talents or Mega Grants).</p> <p>While not illegal, federal legislation is under consideration that would bar individuals who have participated in such programs from receiving grant funding from the Department of Defense and potentially, the Department of Energy.</p>	<ul style="list-style-type: none"> • If you are contacted by such a program, you should contact NU-RES Research Compliance for guidance. • If you have already applied, seek prior approval from your college dean prior accepting a talent program award. • See the disclosure matrix and the Research Security FAQs for additional information on participation restrictions related to NSF and DOE employees, some which may extend to grantees.
<p>An extended absence overseas while employed at the university. This generally must be approved by the university in advance, and for a limited period of time. Payment from sponsored sources for any such time must be carefully monitored.</p>	<ul style="list-style-type: none"> • Seek prior approval from your college dean’s office. See the faculty handbook. • Contact your NU-RES grants officer to discuss any notifications or prior approvals that may be required to federal awarding agencies, including adjusting level of effort and/or notification of an international work location.
<p>Export of materials, equipment, hardware, software, or technical data subject to restrictions on access/dissemination out of the US; this includes sharing technical data with foreign nationals (e.g., students) <i>even if it stays in the US</i>. Depending on the applicable regulation(s), technical data controls may apply to information already in existence, developed in the context of performing the current research, or both.</p>	<ul style="list-style-type: none"> • If your project is subject to publication and/or personnel restrictions, or you intend to take or send research materials abroad, consult with NU-RES Research Compliance to determine licensing requirements. See the Export Control pages for more information. • You may also be required to submit an eCLAWS request to NU-RES for Material Transfer Agreements or Data Use/Transfer Agreements.

HIGH RISK: activities that are not allowable per federal funding agency guidance and/or University policy as detailed in the right-hand column.	
Situation	Additional Steps
<p>“Double-dipping”; i.e., receiving support for the same project from two different entities (e.g., one foreign and one domestic). This may include overlapping scientific, budgetary or levels of commitment, etc. This does not refer to joint sponsorship situations that are clearly disclosed to and supported by both sponsors.</p>	<ul style="list-style-type: none"> • This violates the terms and conditions of federal funded awards and carries a high risk of debarment or suspension and/or other legal action by any applicable federal funding agencies. • See this recent action against Emory researchers for more detail.
<p>Outside activity (i.e. consulting) for a foreign entity beyond the duration allowed by university policy (see policy referenced below).</p> <p>Note: An investigator may devote additional outside effort during periods when they are not working full-time at the university, such as during unpaid months in the summer for those on < 12-month appointments.</p>	<ul style="list-style-type: none"> • You should reach out to NU-RES Research Compliance to confirm Northeastern is able to do business with the foreign entity, some sanction programs are very comprehensive and extend to all companies in a specific country. • If research related, this must be disclosed as current or pending or other research support in proposals and progress reports and includes grants or any other research-related financial support. • You are required by the Policy on Conflict of Commitment and Interest to disclose such support. Visit eCD to update your disclosure.
<p>Breach of confidentiality/disclosure of any proprietary or confidential information (including privileged grant application or review information, reviewer identity, confidential results, etc.) to any individual or entity, foreign or domestic, without the explicit authorization of the data owner (e.g., grant applicant or submitting author) or custodian (e.g., sponsoring agency or publisher to whom the data information was submitted by the owner).</p>	<ul style="list-style-type: none"> • If you are a reviewer for a federal funding agency, this could lead to enforcement actions by the federal funding agency in question. • If you believe someone has accessed your reviewer materials without your consent, contact NU-RES Research Compliance. • See this recent action related to MD Anderson Cancer Center (Science article; Houston Chronicle article).
<p>Accepting or giving authorship credit that does not reflect an individual’s actual contribution to work (e.g., honorary authorship); failing to acknowledge or misrepresenting source(s) of support; or falsely reporting contributions to intellectual property development.</p>	<ul style="list-style-type: none"> • Review the Patent and Copyright Policy in the Faculty Handbook. • ICMJE’s “Defining the Role of Authors and Contributors” or similar sponsor or publisher guidance. • Review agency guidelines and policies related biosketches, current and pending and other research support reports.
<p>Development of intellectual property without disclosure to the Northeastern and/or release of intellectual property for work conceived or done as a university investigator to any entity without appropriate licensing/contract from the Northeastern.</p>	<ul style="list-style-type: none"> • Ensure you are providing prompt and complete disclosures to CRI. • If you have IP that you would like to share with another entity, contact CRI in advance of sharing the materials. • Review the Patent and Copyright Policy in the Faculty Handbook.