

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.

When and Where to Report:

Foreign Relationship Reporting Guidance
When and Where to Report

Type of Activity	Disclosure Required in diSClose	Dean and Faculty Affairs/VP of Research Approval Required	Contact Office of Compliance	List in NIH, DOD, NSF, DOE, etc. Biosketch	List as Other Support for NIH, DOD, NSF, DOE, etc.	List as NIH Foreign Component	List on NSF Cover Sheet
Performance of any significant part of an NIH project outside the United States either by project personnel or a foreign researcher						X	
Any NSF funded activity carried out in cooperation with international parties abroad or virtually in the U.S.							X
Post-doc or student funded by foreign government or institution working in your USC lab					X		
Use of facilities or instrumentation at a foreign site					X	X if related to specific NIH project	
In-kind contributions from a foreign institution or government (office/lab space, equipment, supplies, employees, students, travel support, living expenses) that support <u>any</u> of your research activities					X		
Receipt of financial support or resources from a foreign entity					X	X if related to specific NIH project	
Foreign talents appointment or participation			X				
Grant support received while working at entities outside USC	X	X			X		
Travel paid by a foreign institution or government over \$5,000 per year	X only for NIH researchers						
Paid faculty or consulting position at another university	X	X		X	X		
Unpaid honorary or visiting faculty position at another university		X		X	X if you have access to resources as part of the appointment		
Outside financial interests related to proposed or ongoing research at USC (e.g. payments, stock, position)	X	X					
Outside financial interests related to institutional responsibilities (e.g. payments, stock, position, even if not related to proposed or ongoing research at USC)	X for NIH researchers						
Any position in an outside start-up	X			X			

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.