1.0 Standard Operating Procedure (SOP) Purpose

The purpose of this SOP is to describe the review steps to be followed by the Office of Research Integrity (ORI) when a researcher submits an affirmative response to a question in the Conflict of Interest (COI) Reporting Form regarding monetary or other support from a foreign government or organization for research or other academic activities that are not being administered through Brown (the “Foreign Influence Question”), or fails to report a qualifying interest known by ORI to exist.

2.0 SOP

2.1 Disclosure Scenario 1: Via COI Reporting Form

A researcher discloses in the COI Disclosure Form foreign research support, involvement in a foreign research project, or income from a foreign institution for research activities.

Process to be followed:

- ORI staff will review reported information as timely as practicable and with consideration given to the high volume of COI Disclosure submissions received during the annual cycle.
- ORI staff will contact the researcher to obtain additional information, if such information is not provided in the COI Reporting Form or if ORI determines that additional information is needed. Questions ORI may pose to researchers when seeking additional information include, but are not limited to, the following:
  - What is the title of the research project and sponsor’s name?
  - When did this engagement begin and, if applicable, end?
  - Whether the researcher believes there is, is there scientific overlap with any funded or pending grants or contracts submitted to a sponsor in the U.S.?
  - Is there compensation/reimbursement associated with the foreign engagement?
  - Does the research require extended stays abroad and/or a minimum allocation of effort on the project?
  - Does the research involve use of Brown resources/facilities?
  - Does the researcher have an academic appointment at the foreign institution?

- If the reported engagement involves an academic appointment or title, ORI staff will contact the cognizant Dean or other designated point of contact to confirm that there is documented approval for this appointment or title.
- If ORI determines that the nature of the disclosure warrants additional review, ORI staff will work with the Office of Sponsored Projects (OSP) to review all submissions to funding agencies made on or after the start date of the engagement to ensure that the foreign support and/or academic
appointments/titles were disclosed in current and pending documents/Other Support, Facilities & Other Resources (NSF only), and/or the researcher’s biosketch, if required by the sponsor.

- For all affirmative responses, ORI staff will send an email to the researcher reminding/advising the researcher of the relevant Brown policies and sponsor disclosure requirements related to the engagement.

2.2 Disclosure Scenario 2: Via Other Knowledge Channels

A researcher discloses no foreign research support, involvement in foreign research projects, or income from a foreign university for research activities in the COI Reporting Form, but ORI has knowledge of such engagement(s).

Process to be followed:

- ORI staff will work with the cognizant Dean’s office to verify the existence and details of the undisclosed foreign engagement.
- ORI staff will work with the cognizant Dean to clarify with the investigator the details of any outside engagements and, if required, request revisions to the COI Reporting Form.
- If ORI determines that the nature of the disclosure warrants additional review, ORI staff will work with the Office of Sponsored Projects (OSP) to review all submissions to funding agencies made on or after the start date of the engagement to ensure that the foreign support and/or academic appointments/titles were disclosed in current and pending documents/Other Support, Facilities & Other Resources (NSF only), and/or the researcher’s biosketch, if required by the sponsor.
- For all affirmative responses, ORI staff will send an email to the researcher reminding/advising the researcher of the relevant Brown policies and sponsor disclosure requirements related to the engagement.

2.3 Notification to Sponsor(s) and Other Administrative Actions

If, through the processes described above, ORI learns that required approvals and/or disclosures to funding agencies were not made, ORI will:

- Engage the Office of General Counsel (OGC) to determine (a) if further investigation is warranted and (b) whether and how disclosures do the funding agency or agencies should be made.
  - If further investigation is warranted, ORI will conduct such investigation, with OGC support, as needed.
- Notify or otherwise engage the cognizant Dean and the Vice President for Research.
- Inform the cognizant Dean and/or owner of any relevant institutional policies (for example, the Policy on Outside Professional Activities for Faculty and the Conflict of Interest and Commitment Policy) so they may take appropriate action related to those policies.

2.4 Documentation

ORI staff will document the above-referenced actions taken by ORI and related correspondence on the ORI shared drive.
3.0 Definitions

For the purpose of this SOP, the terms below have the following definitions:

**Conflict of Interest Reporting Form:** An annual and transactional electronic form submitted via InfoEd by investigators that includes questions related to conflicts of interest and conflicts of commitment, including the Foreign Influence Question.

**Foreign Influence Question:** “Have you or will you receive any monetary or other support from a foreign government or organization for research or other academic activities (e.g., salary, grants, lab space, or equipment) that is not being administered through Brown University?”

4.0 Responsibilities

All individuals to whom this SOP applies are responsible for becoming familiar with and following this SOP. University supervisors are responsible for promoting the understanding of this SOP and for taking appropriate steps to help ensure compliance with it.

**Office of Research Integrity (ORI):** Review all COI Disclosure Forms, reach out to investigators for further information, coordinate response across offices, and document all cases.

**Office of Sponsored Projects (OSP):** Work with ORI to review grant proposals and other support and biosketch documents for disclosure compliance.

**Office of General Counsel (OGC):** Review and advise on matters related to sponsor notification and otherwise as needed.

**Investigators:** Cooperate fully with ORI and other University offices to provide requested information timely, truthfully and accurately.

5.0 Related Information

The following information compliments and supplements this document. The information is intended to help explain this SOP and is not an all-inclusive list of policies, procedures, laws and requirements.

5.1 Related University Policies:
- Policy on Outside Professional Activities for Faculty
- Conflict of Interest and Commitment Policy

5.2 Related SOPs: N/A

5.3 Related Forms:
- Conflict of Interest Reporting Form (accessible via InfoEd)

5.4 Frequently Asked Questions (FAQs): N/A

5.5 Other Related Information:
- In accordance with Brown’s Conflict of Interest and Conflict of Commitment Policy and subsidiary Conflict of Interest in Research Policy, Brown faculty and other researchers must submit an annual COI Reporting form through InfoEd. Beginning with the annual COI Reporting
cycle administered in calendar year 2020, ORI established enhanced processes to ensure that any affirmative responses to a question added in calendar year 2019 are assessed to ensure compliance with institutional policies and federal regulations.

- Following closure of the annual COI Reporting cycle, ORI staff sends all researcher disclosures of Conflicts of Commitment, including any affirmation of the Foreign Influence Question, to the cognizant Dean (or that individual’s designee at the Dean’s instruction) for review and follow-up, as needed, in accordance with relevant institutional policies, such as the Policy on Outside Professional Activities for Faculty.

6.0 SOP Owner and Contact

6.1 SOP Owner: Senior Director, Office of Research Integrity
6.2 SOP Approved by: Vice President for Research
6.3 Subject Matter Contact: Associate Director, Office of Research Integrity
   - Telephone: 401-863-3050
   - Email: COI@brown.edu

7.0 SOP History

7.1 SOP Effective Date: August 5, 2020
7.2 SOP Last Reviewed: N/A
7.3 SOP Update/Review Summary: Formatted to comply with new University SOP template.