



Brown University Guide to Disclosure & Approvals related to Foreign Engagements & Research Activities

The following information is intended as a guide to assist researchers with determining disclosure and approval requirements related to foreign engagements and research activities. This guide is **not** intended to address every potential scenario. If you discover that you did not receive required approval or did not appropriately disclose a foreign engagement or research activity as required by University policy or federal regulation, contact the Office of Research Integrity at ORI-Admin@Brown.edu to determine the appropriate course of action.

The following activities are generally acceptable but may require disclosure and/or pre-approval

- **Brown has or will receive an award/sub-award from a foreign university or company.**
 - ✓ Follow established processes for [sponsored research awards and subawards](#).
 - ✓ No additional disclosure to the University is required.
- **A foreign entity (university, government, industry, or foundation) reimburses a Brown investigator's travel costs, pays an honorarium to the investigator, or otherwise provides funding or support to an investigator to participate in a conference or deliver a lecture.**
 - ✓ This may need to be reported on the University's COI Reporting form, depending on the amount received/reimbursed.
 - **Related Brown Policies:** [Conflict of Interest and Commitment Policy](#); [Conflict of Interest in Research Policy](#);
 - **Related Guidance:** [Conflict of Interest in Research](#).
- **An investigator participates in research in a foreign country.**
 - ✓ Any effort, compensation, or credit relating to foreign research must be disclosed, and must be in accord with actual work done, effort expended, or support provided.

We thank the University of Virginia for providing permission to adapt its Foreign Influence Guide to meet the needs of the Brown University community.

- [Related Guidance: Identifying all sources of support in proposals for external funding; Guidelines on Authorship in Scholarly or Scientific Publications](#)
- ✓ If a Brown investigator engages in **unpaid** research activities with a foreign research entity, review and approval may be required if the investigator's affiliation with the foreign research entity is listed in whole or in part on research products (e.g., patents, publications, presentations, and sponsored research proposals). In addition, any academic and professional appointments and affiliations need to be reported on federal grant applications.
 - [Related Brown Policies: Patent and Invention and Copyright Policy, Policy on Outside Professional Activities for Faculty.](#)
 - [Related Guidance: Brown Technology Innovations, Identifying all sources of support in proposals for external funding](#)
- ✓ If a Brown investigator is **paid** by or receives any in-kind support from a foreign research entity for any research activities, this must be disclosed in funding applications submitted through Brown. In kind support includes, but is not limited to, equipment access, travel support, lab space, and personnel support.
 - [Related Brown Policies: Policy on Outside Professional Activities for Faculty.](#)
 - [Related Guidance: Identifying all sources of support in proposals for external funding](#)
- ✓ If a Brown investigator is listed as personnel on a research project at another institution, including a foreign institution, that project must be disclosed on the investigator's current and pending/Other Support even if compensation is not provided. In addition, any type of monetary or in-kind support received needs to be disclosed in grant applications under current and pending/Other Support, biosketches and/or Facilities and Other Resources, depending on the type of support.
 - [Related Brown Policies: Policy on Outside Professional Activities for Faculty.](#)
 - [Related Guidance: Identifying all sources of support in proposals for external funding.](#)
- ✓ Payments directly received from foreign universities may also need to be reported as financial interests on the University's COI Reporting form.
 - [Related Brown Policies: Conflict of Interest and Commitment Policy, Policy on Outside Professional Activities for Faculty.](#)
 - [Related Guidance: Identifying all sources of support in proposals for external funding, and international collaborations](#)

The following activities may be acceptable but require disclosure and/or prior approval

- **A foreign university will pay an investigator directly to participate on a research project as a consultant.**
 - ✓ Payments directly received from foreign universities may need to be reported as financial interests on the University's annual COI Reporting form, depending on the amount received.

We thank the University of Virginia for providing permission to adapt its Foreign Influence Guide to meet the needs of the Brown University community.

- ✓ The project must be disclosed as current and pending/Other Support in funding applications.
 - Related Brown Policies: [Policy on Outside Professional Activities for Faculty](#), [Conflict of Interest and Commitment Policy](#), [COI in Research Policy](#), [Patent and Invention and Copyright Policy](#)
 - Related Guidance: [Engaging in outside activities](#); [Identifying all sources of support in proposals for external funding](#)
- **An academic appointment is conferred at another institution, foreign or domestic.**
 - ✓ This requires the written prior approval of the cognizant Dean.
 - Related Brown Policies: [Policy on Outside Professional Activities for Faculty](#), [Handbook of Academic Administration, Chapter 4](#) (“Faculty Handbook”)
- **Recruitment into a foreign talent program (e.g., Thousand Talents Plan).**
 - ✓ If an investigator is contacted by such a program, the investigator should contact the Office of Research Integrity (ORI-admin@Brown.edu) for guidance.
 - ✓ If the program includes a visiting or honorary academic appointment at a foreign institution, written *prior* approval of the cognizant Dean is required.
 - ✓ Participation in a foreign talent program is not illegal. However, the Department of Energy prohibits researchers who are participating in certain talent programs from working on Department of Energy funded projects. In addition, federal legislation is under consideration that would bar individuals who have participated in such programs from receiving grant funding from the Department of Defense. This funding restriction could be broadened to include other federal granting agencies.
 - Related Guidance: [International relationships and research activities](#)
- **Export outside of the US of materials, equipment, hardware, software, or technical data subject to restrictions on access/dissemination or otherwise requiring an export control license based on its export control classification.**
 - ✓ Hand-carrying or shipping certain materials (e.g., biological, chemical, cell lines, reagents, etc.), equipment, hardware, software, or technical data outside the US may be prohibited or may only be authorized via an export control license or documentation that the exporter is using an appropriate export control exemption.
 - Related Brown Policies: [Export Control and Economic Sanctions Policy](#)
 - Related Guidance: [Export controls website](#), [Export Control Procedures](#), [Export Control Compliance Manual](#)

The following activities are prohibited

- **A faculty member receives federal research funding through Brown and reports effort on the award while also being paid as an employee of a foreign research institution.**
 - Related Brown Policies: [Policy on Outside Professional Activities for Faculty](#), [Effort Reporting Policy](#), [Conflict of Interest in Research Policy](#)
 - Related Guidance: [Conflict of Interest web page](#).
- **False Representations of Research Contributions**
 - ✓ Accepting or giving authorship credit that does not reflect an individual’s actual contribution to work (e.g., ghost or honorary authorships).

We thank the University of Virginia for providing permission to adapt its Foreign Influence Guide to meet the needs of the Brown University community.

- ✓ Failing to acknowledge or misrepresenting source(s) of research support.
- ✓ Falsely reporting contributions to intellectual property development.
 - Related Brown Policies: [Effort Reporting policy](#), [Patent and Invention and Copyright Policy](#)
 - Related Guidance: [Guidelines on Authorship and in Scholarly or Scientific Publications](#), [Brown Technology Innovations](#) and [international collaboration](#) webpages.
- **Receiving financial or other types of non-financial (e.g., access to space, equipment, facilities, students) support for the same project / scope of work from two different entities (e.g., a US federal sponsor and a foreign source).**
 - ✓ This does not refer to joint sponsorship situations that are clearly disclosed to and supported by both sponsors.
 - Related Brown Policies: This action would violate the terms and conditions of sponsored research awarded to Brown.
- **Breaches of Confidentiality**
 - ✓ Disclosure of any confidential information for which a Brown researcher has signed a confidentiality agreement, Non-Disclosure Agreement, or another other type of agreement binding the investigator to confidentiality (including, for example, in serving as a reviewer for a sponsor study section) to any individual or entity, foreign or domestic, without explicit authorization, is viewed as a violation of Brown's Code of Conduct.
 - Related Brown Policies: [Brown University Code of Conduct](#).
- **Diversion of Intellectual Property**
 - ✓ Development of intellectual property without disclosure to the University and/or release of intellectual property for work conceived or done as a University investigator to any entity without appropriate licensing/contract from the University.
 - Related Brown Policies: [Patent and Invention Policy](#).
 - Related Guidance: [Brown Technology Innovations](#).