



BROWN

**To:** Faculty, Staff, and Graduate Students

**From:** Jill C. Pipher, Vice President for Research

**Date:** September 17, 2019

**Re:** Your Responsibilities Regarding Disclosure and Reporting Requirements Related to Foreign Engagements with Brown University research

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Consistent with its mission, Brown University is deeply committed to and invested in international collaboration and scholarship. We welcome scholars and students from around the world into our research labs and classrooms and value each of these individuals as members of our community. As you may know, United States Government (USG) agencies and major federal sponsors of research at Brown are closely scrutinizing whether engagements with foreign entities and individuals, particularly in the form of research funding, gifts and collaboration, are in compliance with laws and regulations that govern these engagements. Their concerns focus on national security and the potential for valuable intellectual property and other research resources being inappropriately and sometimes illegally transferred to foreign nations.

This is an evolving area of concern and focus for the USG. As such, we have established a comprehensive informational webpage for our Brown community, “[International Relationships & Research Activities](#).” This webpage will be updated as requirements change over the course of time and Brown’s processes subsequently evolve to facilitate compliance. **We ask that you please take a moment to review this page and familiarize yourself with its content, including Brown-specific [Practical Guidance & Resources](#).**

Brown remains dedicated to supporting our faculty, staff and students in this time of heightened interest in our global research activities. To help Brown ensure compliance with laws and regulations and support University research, we ask that you comply with University and USG disclosure requirements and policies.

We highlight below a list of required compliance steps, aligned with disclosure channels, Brown policies, and resources to contact for assistance:

- Disclose information on active and pending support (“Other Support”) and non-US performance sites during the proposal submission process and as they arise throughout the lifetime of a project as required by external sponsors. Additional information on sponsor requirements can be found [here](#).
- Disclose conflicts of interest and outside professional activities in accordance with institutional policies, including the [Conflict of Interest and Commitment Policy](#), [Conflict of Interest Policy](#)

[for Officers of Instruction and Research](#), and the [Policy on Outside Professional Activities for Faculty](#).

- Comply with export control procedures set forth in Brown's [Export Control Compliance Manual](#).
- When traveling internationally, review procedures outlined on the Office of Research Integrity's [International Travel Information](#) page. Comply with export control regulations regarding tangible items, technologies, and software that are sent or taken abroad. The [Export Control Compliance group](#) can assist with export license applications and determinations, as well as restricted party screening. Follow Brown CIS guidance on preparing your [laptop](#) and [mobile device](#) for international travel. CIS also offers an international device loaner program available to any member of the Brown community upon request.
- Work with the appropriate office when you may receive gifts or sponsored research funds to ensure institutional review and vetting is conducted. If you are contacted by a company, organization, or an individual regarding a potential gift (monetary or in-kind) or offer of collaboration, involve the following University offices as early as possible in these discussions:
  - For research support and collaborations with non-profit organization, foundations, or foreign governments, contact the [Office of Sponsored Projects](#) (OSP)
  - For research support and collaborations with industry, contact the [Office of Industry Engagement and Commercial Venturing](#) (IECV)
  - For gifts, contact [Advancement](#)
- Ensure that you disclose Intellectual Property in accordance with [institutional policy](#). Include all inventors, regardless of whether the inventors are affiliated with Brown or the funding supporting the work is foreign or domestic.
- Comply with [University signatory authority requirements](#). You cannot sign any type of partnership agreement, data sharing agreement, material transfer agreement or otherwise commit or implicate the University or its resources through legal agreements or documents, whether binding or non-binding, unless you are authorized to do so. This includes, but is not limited to, memoranda of understanding (MOUs), letters of intent, collaboration agreements, sponsored research agreements, Non-Disclosure Agreements (NDAs), Confidential Disclosure Agreements (CDAs), and license agreements.

We thank you for your attention to these important institutional policies and procedures, which protect and support our entire Brown community in this ever-changing compliance landscape, while also upholding our institutional commitment to complying with government regulations and laws. We remain invested in creating and nurturing a community at Brown that is international in scope and grounded in our unwavering support of free and open inquiry.

If you have any questions about the information in this letter, please contact Brown's Office of Research Integrity at [ORI@Brown.edu](mailto:ORI@Brown.edu).