CLEAR Monthly Webinar (October 2020)

Hosted by Sponsored Research
October 15, 2020
Today’s Agenda

• Announcements
  – CLEAR On Demand
  – Staffing and Finding Your GO/CO
  – Subcontracts Web Page Updates
  – NIH Due Dates

• Update on Sponsor Expectations for Reporting Other Support
CLEAR Available On Demand

- CLEAR webinars April – September 2020 are available online
- Starting with this webinar, each recording will be posted for on-demand viewing usually the day after the live event
- Registration is required – be sure to use the Northwestern SSO to login
- Annotated slide decks will remain available
- Find it all on the Presentations page https://osr.northwestern.edu/presentations/
Staffing

Subcontract Management

• New team members
  – Matthew Winter, Grants Officer (9/16)
  – Bonnie Cairns, Assistant Grants Officer (10/1)
  – Anthony Williams, Subcontracts Assistant (10/19)

• Subcontract constituency assignments have been updated on the Find My GO/CO Tool
Quick Tips to Quickly Find (Your) Grants Officer / Contracts Officer

- Filters are your friends
- Be mindful what you click
Subcontracts Web Page Update

• Updated tab structure: Items of note
  – Research Compliance and DocuSign guidance
  – Find sufficient funds info on the Other Info tab, including a link to sufficient funds tools

Sponsor Approval and Notice of Award (NOA) Terms

Prior sponsor approval requirements for adding new subcontracts are determined by the prime sponsor award. For FDP/RTC awards, please refer to the RTC Prior Approval and Other Requirements Matrix. When a subcontract is not included in the originally approved budget, please work with OSR to determine if sponsor prior approval is required. [NOTE: Not all sponsors require that the subcontract entity be listed on the NOA.]

Sufficient Funds Verification

- Subcontracts team will rely on Unit verification of sufficient funds allocated to subcontract budget lines in NU Financials
- Units encouraged to attach supporting documentation of sufficient funds verification to CR subcontract requests
- Subcontracts team will process re-budget in NU Financials if/when Unit:
  - Determines there are insufficient funds and
  - Provides re-budget guidance in the subcontract CR request

See the Tools/Forms page to download sufficient funds verification tools.
## Upcoming NIH Due Dates

<table>
<thead>
<tr>
<th>Due Date</th>
<th>Description</th>
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<tbody>
<tr>
<td>October 25*</td>
<td>• R15 Academic Research Enhancement Award (AREA)</td>
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<td></td>
<td><em>Sunday</em></td>
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<td></td>
<td>All - new, renewal, resubmission, revision</td>
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<td>November 5</td>
<td>• R01 Research Grants</td>
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<td></td>
<td>renewal, resubmission, revision</td>
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<td></td>
<td>• U01 Research Grants - Cooperative Agreements</td>
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<td></td>
<td>renewal, resubmission, revision</td>
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<td>November 12</td>
<td>• K Series Research Career Development</td>
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<tr>
<td></td>
<td>renewal, resubmission, revision</td>
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<tr>
<td>November 16</td>
<td>• Other Research Grants and Cooperative Agreements</td>
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<tr>
<td></td>
<td>(R03, R21, R33, R21/R33, R34, R36, U34, UH2, UH3, UH2/UH3)</td>
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<tr>
<td></td>
<td>renewal, resubmission, revision</td>
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<tr>
<td>December 8</td>
<td>• F Series Fellowships <em>Individual</em> National Research Service Awards</td>
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<td></td>
<td>(including F31 Diversity)</td>
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<tr>
<td></td>
<td>new, renewal, resubmission</td>
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Individual NRSA (F-Series) Proposal Prep Tips

• Pass along NRSA preparation resources to students / post-docs who are applying
  – Job Aid: Getting Started Guide: Preparing an Individual NRSA
  – Microlearning: The “No Tears” NRSA: How to Successfully Prepare and Submit an Individual Fellowship Application

• Get the project set up in InfoEd early
  – New automatic system messages that go to COI Office when a person hits eDisclosure for the first time and has never disclosed
  – Let the system do the heavy lifting
Update on Sponsor Expectations for Reporting Other Support

Kate Cosgrove Booth, Director NUCOI
Plan for today…

• High-level overview of foreign interference

• Federal agency responses & harmonization efforts

• Walk through of opportunities to report

• Questions
Headlines

April 2019 – MD Anderson: 3 scientists fired, incl tenured faculty – undisclosed relationship

May 2019 – LANL: Researcher indicted for lying to officials

May 2019 – Emory: Two scientists fired for undisclosed relationship

Aug 2019 - U. Kansas: Faculty member indicted for fraud (failure to disclose)

Jan 2020 – Harvard: Chemistry Chair arrested for false statements

March 2019 – DOE: Bans talent program participation for any DOE staff; requires add’l screening for anyone on-site

July 2020 – OSU: Rheumatologist charged with grant fraud; dual employment

July 2020 - Stanford: Visiting researcher charged w visa fraud

May 2019 – LANL: Researcher indicted for lying to officials

April 2019 – MD Anderson: 3 scientists fired, incl tenured faculty – undisclosed relationship

Dec 2019 – Van Andel: $5.5M settlement over failure to disclose relationship

Dec 2019 – Moffitt: CEO and 5 researchers fired – undisclosed offshore accounts and collaborations

March 2019 – DOE: Bans talent program participation for any DOE staff; requires add’l screening for anyone on-site
Reports

U.S. Department of Education

ARCHIVED INFORMATION

U.S. Department of Education Launches Investigation into Foreign Gifts Reporting at Ivy League Universities

Since July, the Department has uncovered more than $6 billion in unreported foreign gifts to Harvard, Yale, and the United Arab Emirates

FEBRUARY 12, 2020

Contact: Press Office, (202) 401-1974, press@ed.gov

WASHINGTON — The U.S. Department of Education announced today it is launching investigations into both Harvard and Yale Universities after it appears both Ivy League higher education institutions potentially failed to report hundreds of millions of dollars in foreign gifts and contracts.

Enhancing the Security and Integrity of America’s Research Enterprise

The White House Office of Science and Technology Policy

www.whitehouse.gov/ostp
www.nist.gov

NIH Advisory Committee to the Director (ACD)

ACD Working Group for Foreign Influences on Research Integrity

December 2018 Report

CHINA’S IMPACT ON THE U.S. EDUCATION SYSTEM

STAFF REPORT

PERMANENT SUBCOMMITTEE ON INVESTIGATIONS

UNITED STATES SENATE

News Release 19-023

NSF releases JASON report on research security

NSF-commissioned study by the independent JASON group calls foreign influence threat a complex issue that can be addressed within the framework of research integrity.
Examples of behaviors that increase risk and can harm the research enterprise

Irresponsible Conduct that Violates Funding Agency and Institutional Policies:

• Failures to disclose:
  • Financial conflicts of interest
  • Conflicts of commitment
  • External employment arrangements
  • Financial support that overlaps with U.S. funding
  • Shadow laboratories or other parallel research activities
• Diversion of intellectual property
• Peer review violations

Potential Impacts:

• Distorted decisions about appropriate use of taxpayer funds
• Hidden transfers of information, know-how, data, and time
• Diversion of proprietary information and pre-publication data to foreign entities
• Loss of Federal research funding, or need to replace key personnel
• Damage to the reputation of research institutions and researchers
• Reputational, career, and financial detriment to individuals
• Loss of public trust in the research enterprise

Examples of Behaviors that May Violate Laws:

• Theft or diversion of materials and intellectual capital
• Grant Fraud

Case study 5: Criminal grant fraud

Researcher found guilty of conspiring to commit federal grant fraud, making false statements, and obstruction by falsification

- Founded a U.S. company and applied for DOE and NSF grants to fund his U.S. company to conduct research between 2014-2016; at least some research had already been completed in China, including by researcher’s own “Satellite Lab”
- Signed undisclosed five-year employment agreement with Chinese University in 2014 to serve as Director of Research Institute

Grant Fraud “Shadow Lab”

Unreported Conflict of Commitment

Impacts:
- **Distorts decisions** about appropriate use of taxpayer funds

Researcher was found guilty on February 21, 2019. 
Case # 7:17-cr-00073 (Western District of Virginia)
What are universit**es** doing to safeguard research, and demonstrate good stewardship of federal funds?
Behaviors of Concern

Disruption of the peer review process and **inappropriate sharing** of grant applications during peer review process.

Conducting the same, or similar, research at two institutions (aka having a “shadow lab”) and/or having the same project supported by both US federal funds and foreign funds.

**Incomplete disclosure of relationships** with foreign governments or other institutions to sponsors and the investigator’s home institution.
Federally Sponsored Research

• What are federal sponsors asking for?
  • Candid and thorough accounts of other support for research programs
  • Disclosure of any foreign component of the research
  • This is not new, however increased attention is being dedicated to overseeing compliance
Opportunities to disclose/report

**Biosketch:** Include any titled academic, professional or institutional appointments and affiliations whether paid or unpaid, including adjunct, visiting, guest, or honorary.

**Facilities / Other Resources:** Project-specific resources, including: in-kind materials, personnel with their own funding (e.g., visiting postdocs) who are available to the project.

**Other Support / Current & Pending:** “All means all” “Any time commitment” Resources available to the research program, whether at Northwestern or elsewhere, including: funding (whether contributing salary support or not), access to lab space, funded visitors, materials/in-kind resources not available to all.

**Progress Reports:** Annually update participant lists, accounting for both paid and unpaid contributors, foreign components, and other support, as applicable.

**FCOI Reports:** Identified SFI s that could be perceived as introducing bias into the design, conduct, or reporting of the research.
**Biosketch - Consistent**

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<tr>
<th>B. Positions and Honors</th>
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<tbody>
<tr>
<td><strong>Positions and Employment</strong></td>
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<tr>
<td>1988-2000 Fellow, Division of Intramural Research, National Institute of Drug Abuse, Bethesda, MD</td>
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<tr>
<td>2000-2002 Lecturer, Department of Psychology, Middlebury College, Middlebury, VT</td>
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<td>2001- Consultant, Coastal Psychological Services, San Francisco, CA</td>
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<tr>
<td>2002-2005 Assistant Professor, Department of Psychology, Washington University, St. Louis, MO</td>
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<tr>
<td>2007- Associate Professor, Department of Psychology, Washington University, St. Louis, MO</td>
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<tr>
<th>Other Experience and Professional Memberships</th>
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<tr>
<td>1995- Member, American Psychological Association</td>
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<tr>
<td>1998- Member, Gerontological Society of America</td>
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<tr>
<td>1998- Member, American Geriatrics Society</td>
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<tr>
<td>2000- Associate Editor, Psychology and Aging</td>
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<td>2003- Board of Advisors, Senior Services of Eastern Missouri</td>
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<tr>
<td>2003-05 NIH Peer Review Committee, Psychobiology of Aging, ad hoc reviewer</td>
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<tr>
<td>2006-11 111 Professor, Northeast Normal University, China</td>
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<tr>
<td>2007-11 NIH Risk, Adult Addictions Study Section, members</td>
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<td>2016- Visiting Professor, Trondheim University, Norway</td>
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<th>Honors</th>
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<td>2003 Outstanding Young Faculty Award, Washington University</td>
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<td>2004 Excellence in Teaching, Washington University</td>
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<td>2009 Award for Best in Interdisciplinary Ethnography</td>
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<tr>
<td>2014 Honorary Visiting Professor, Chinese Academy of Sciences</td>
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| C. Contribution to Science |

**B. APPOINTMENTS**

(see PAPPG Chapter II.C.2.f(i)(b))

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<tr>
<th>From - To</th>
<th>Position Title, Organization and Location</th>
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<tbody>
<tr>
<td>1998-2000</td>
<td>Fellow, Division of Intramural Research...</td>
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<tr>
<td>2000-2002</td>
<td>Lecturer, Department of XX, YYYY institution</td>
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<tr>
<td>2001-</td>
<td>Consultant, Acme, Inc.</td>
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<tr>
<td>2002-2005</td>
<td>Assistant Professor, Department of XXX, YYYY institution, CA</td>
</tr>
<tr>
<td>2006-2011</td>
<td>111 Professor, ABAB University, China</td>
</tr>
<tr>
<td>2007-</td>
<td>Associate Professor, Department of ZZZ, YYYY institution, CA</td>
</tr>
<tr>
<td>2018 -</td>
<td>Visiting Professor, Trondheim University, Norway</td>
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Honorary, Visiting, and Guest appointments can be accounted for in the Other Professional Memberships and Honors sections.
Other Support / Current & Pending

NIH “...all current projects and activities that involve senior/key personnel, even if the support received is only in-kind (e.g. office/laboratory space, equipment, supplies, employees). All research resources including, but not limited to, foreign financial support, research or laboratory personnel, lab space, scientific materials, selection to a foreign “talents” or similar-type program, or other foreign or domestic support must be reported.” – NOT-OD-19-114

NSF “...all resources made available to an individual in support of and/or related to all of his/her research efforts, regardless of whether or not they have monetary value. [C&P] support also includes in-kind contributions (such as office /laboratory space, equipment, supplies, employees, students.” – PAPPG, Ch. II.C.2.h

DOE “...all sponsored activities, awards, and appointments, whether paid or unpaid; provided as a gift with [or without] terms or conditions; full-time, part-time, or voluntary; faculty, visiting, adjunct, or honorary; cash or in-kind; foreign or domestic; governmental or private-sector; directly supporting the individual’s research or indirectly supporting the individual by supporting students, research staff, space, equipment, or other research expenses. All foreign government-sponsored talent recruitment programs must be identified in current and pending support.” DE-FOA -0002359
Resources & Facilities

One visiting postdoc, funded by [organization] and one student funded by [government] are available to contribute to this project.

PI has access to yyyyy equipment at zzz institution, which will be provided in-kind for the purposes of this project.

Resources – including visiting researchers with external funding – that are available TO THE PROJECT BEING PROPOSED can be accounted for in the Resources & Facilities section.
NIH has posted a table of what information needs to be included in what documentation.

Conflict of Interest / Conflict of Commitment

• Faculty who are engaged in research are asked about:
  – Serving as PI for research outside of Northwestern
  – Having an academic appointment outside of Northwestern (incl. visiting & honorary)
  – Receiving any other support for research that did not go through OSR or ARD

• All researchers subject to the Policy on COI in Research are asked about participation in talent recruitment programs
Roles

• Faculty / Investigators – be candid and thorough in keeping biosketches and other support / C&P documentation up-to-date.

• Department Research Administrators – no need to be investigators(!). Gentle, general, non-targeted reminders of “anything else?” as a process would be helpful.
Roles

• Conflict of Interest – Manages the system and process for disclosure and review of outside professional activities including those with foreign entities / governments

• Export Compliance – Oversees a wide range of “export”-oriented activities for the University, which have coalesced under the broad umbrella of “foreign influence”
VPR Guidance to Faculty

Faculty Must / Should / Cannot

Outside Appointments

Faculty Must:
— Receive approval from dean's offices before accepting any appointment at another institution per the Faculty Handbook
— Disclose any existing outside appointment at Northwestern in eDisclosure for review by their dean’s office
— Include the appointment in documentation to sponsors (e.g. Biosketch)

Should:
— Forward a copy of the agreement/appointment letter to their dean's office for review to identify any potential red flags that should be addressed

Cannot:
— Use Northwestern's name in any work done for that institution, except as a method of identification

Links to Resources

- FAQs to NOT-OD-114-19: [https://grants.nih.gov/faqs/#/other-support-and-foreign-components.htm](https://grants.nih.gov/faqs/#/other-support-and-foreign-components.htm)
- NSF PAPPG C&P: [https://www.nsf.gov/pubs/policydocs/pappg20_1/pappg_2.jsp#IIC2h](https://www.nsf.gov/pubs/policydocs/pappg20_1/pappg_2.jsp#IIC2h)
Contact Information

• Kate Booth, Conflict of Interest (k-cosgrove@northwestern.edu) | 847-491-4163

• Lane Campbell, Export Controls (lcampbell@northwestern.edu) | 847-467-4063
Questions?
Thank you for attending!

Join us for the next CLEAR webinar on Thursday, December 10, 12:00pm