



USC University of Southern California

TO: All Faculty

CC: Charles Zukoski, Provost and Senior VP for Academic Affairs

FROM: Anthony Bailey, Vice President for Strategic and Global Initiatives
Randolph Hall, Vice President of Research
Daniel Shapiro, Assistant Vice President, Office of Ethics and Compliance

DATE: November 19, 2019

SUBJECT: International Collaborations, Export Controls and Disclosure Requirements

USC is a global institution committed to far-reaching global engagement in all of our research and learning programs, as well as inclusion of international students in our research, regardless of their nationality and religious beliefs. Toward that end, USC issued a policy on International Collaborations and Export Controls in 2017 (<https://policy.usc.edu/international-collaborations-and-export-controls/>), after receiving broad input from the university community, in cooperation with the Academic Senate, the Senate/Provost University Research Committee, and a special task force of faculty and staff.

Key features include:

- Protection of ability to publish research and to include foreign nationals in research, except under exceptional conditions.
- Creation of a standing faculty committee to review and advise on research projects that may present restrictions on the dissemination of research results and/or participation of foreign nationals (faculty, staff, students);
- Approval process from the Office of the Vice President for Strategic and Global Initiatives before establishing an overseas presence or international partnership with any overseas university, institution, or governmental entity; and
- Guidance on doing business with foreign governmental officials in accordance with the Foreign Corrupt Practices Act (FCPA).

Since the committee was established, it has reviewed several requests from faculty on the UPC and HSC to permit research carrying restrictions. These have only been approved in rare cases. The committee has rejected all requests where sponsors sought to restrict publication of research in which USC's role was to be an independent evaluator. The committee has also rejected

requests where investigators were unable to meet regulatory requirements, or where students would be subject to external approval for research meeting academic requirements.

We would also like to make you aware that the U.S. government – through the Departments of State, Commerce, and Treasury – maintains several lists of entities, individuals, and countries with whom we may be restricted from entering into certain types of transactions. This can impact university research, instruction, healthcare, student outreach, and other strategic partnerships and affiliations. The Office of Ethics and Compliance partners with the Department of Business Services, USC Global, and other offices to monitor transactions and activities that might be affected by these restrictions. That said, these lists are updated frequently, so if you are uncertain whether a particular entity, individual, or destination is subject to restrictions, please consult with the Office of Ethics and Compliance. For additional detail, please visit the Office of Ethics and Compliance website at <https://ooc.usc.edu/international-activity/>.

Finally, we also take this opportunity to remind faculty of their obligation to disclose outside relationships for review prior to engaging in the activity. Please keep the following in mind:

1) Faculty are not permitted to conduct research at other institutions without exceptional approval. USC policy provides as follows:

“6.2.3 Participation as a principal investigator, co-principal investigator, co-investigator, paid consultant or paid staff member on sponsored projects at another entity (as distinct from research collaborations with other entities via a subcontract or subaward to USC) must be disclosed to the appropriate dean and the Vice President for Research and are prohibited unless specially approved by the dean and the Vice President for Research.”

Please be particularly mindful that this policy applies to relationships at both domestic institutions and foreign institutions and may also apply if the position is not compensated.

2) Academic titles, whatever the title, at other institutions, whether the institution is foreign or domestic, require the written prior approval of the Executive Vice Provost for Faculty Affairs, after recommendation of your dean. Approval is required whether or not you are compensated.

3) Disclosure to USC of Outside Professional Activity: Examples of relationships that require disclosure and approval include: consulting payments or ownership interests that benefit from your research and any consulting by clinicians to the pharmaceutical industry (whether or not research is involved). Please remember that a relationship cannot begin until approved. diSClose is the single portal for disclosing all outside interests at USC.

4) Annual Reporting for HHS Funded Faculty: Faculty and other investigators supported by Health and Human Services funding (including NIH) are obliged to “disclose to their institutions all of their significant financial interests related to their institutional responsibilities.” The required annual HHS disclosure must include all activities that relate to responsibilities at USC, including anything that relates to research, education or clinical activities.

5) Disclosure to Sponsors and Current/Pending Support: Principal Investigators and key personnel must disclose all current and pending support in connection with their proposals, which includes all financial resources, whether Federal, non-Federal, commercial or institutional, available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts, and/or institutional awards. This includes all support for USC faculty research received from foreign sponsors, government or private, even if the funding does not go directly to USC.

For more information on disclosure obligations, please review the FAQs posted at:

<https://research.usc.edu/international-research/>