

# SCCE Higher Education Conference 2023 Phoenix, AZ

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# OBJECTIVE

- Learn what foreign activity is and why it is important that faculty and researchers disclose it
- Discover what Institutional data and open-source data are useful for performing a risk assessment
- Identify best practices to review and assess non-disclosed foreign activity risk

# DISCLAIMER

- **The example used came from publicly available information regarding a case from a “hypothetical” university.**
- **This is not a specific country issue. Any undisclosed affiliation is a concern.**

# Definition of Non-Disclosure of Foreign Activity

Non-disclosure: An external activity that should be disclosed to your Institution so that your Institution can determine if a Conflict of Interest exists and can or cannot be mitigated.

Foreign Activity: External activities that occur outside of your Institution's country, performed for a personal benefit (i.e., research or teaching at another Institution, working for a company, consulting, sitting on a board of directors, a hobby that earns money)

# Why is this important?

## Potential Financial Loss

- Loss of money and resources
- Loss of Intellectual Property
- Loss of research that could have been funded at your Institution
- Federal sponsors halting current or stopping future research
- Loss of gifts/foundation donors
- Federal penalties for violations

# Why is this important?

## Compliance and Risk Potential

- Damage to the Institution's public image/reputation
- Increased Federal scrutiny and reliance on Institution's internal processes for disclosures of foreign activities
- Use of students and staff for faculty's personal use and extending the length of student academic progression
- Lower employee morale

# Step1: Institutional Data

## **Funding sources**

- Federal
  - ❖ Dual Awards
  - ❖ Sub Recipients
- State vs. Corporate
- Gift/Foundation
- **Travel**
- **Disclosed Conflicts of Interest and discussions with COI staff for additional details**

- **Leave of Absence**
- **Lab website**
- **Curriculum Vitae**
- **Talk to the faculty member's supervisor and ask for their annual evaluation**

## Step 2: Open Source

- Google Scholar
- Google Patents
- Affiliate Institution/Company website
- Social Media
  - Facebook
  - Instagram
  - Twitter
  - LinkedIn
  - TikTok
- Secretary of State's business search



# Publication Sites

Elsevier/Scopus/Science Direct

PubMed

IEEE Explore

Dimensions

Directory of Open Access Journals

JSTOR

## Step 3: Evaluate All Your Data

- Consider creating a form to evaluate the risks
  - Travel
  - Expenses and personal reimbursements
  - Undisclosed Patents
  - Questionable publications showing multiple affiliations
  - Other Adverse information

# “HYPOTHETICAL” CASE STUDY EXAMPLE

			Calc. Points
Sponsor	Federal	No	
	State	No	
	Domestic	No	
	Foreign	No	
Foundation Only + Balances	Yes	No	
Foreign Travel Past 3 CY's	High	No	
	Med	No	
	Low	No	
Adverse Information	Yes	No	0
TOTAL			

Country	Score
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	

Foreign Activity Risk Rating		0%
High Risk	70>100	No
Medium Risk	40>69	No
Low Risk	1>39	No

Foreign Travel Risk Rating	
High Risk (Any 100)	No
Medium Risk (Any 50)	No
Low Risk (Any 25 or below)	No



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