

February 14, 2022

Dear Colleagues,

Re: Responsibilities Regarding International Research and Global Collaborations

One of ASU's goals is to enhance research competitiveness to more than \$1 billion in annual research expenditures. As we advance with this continued growth, impact, and success, it is important for the continued compliance of the funds our sponsors provide. ASU's international academic, research, and other scholarly activities are encouraged as we support academic freedom and the ability to exchange ideas and collaborations occurring outside the United States to advance knowledge. To ensure the success in these areas it is critical that we follow our established practices and comply with **all** federal funding agencies guidelines and disclosure requirements. This will allow us to maintain our productive relationship with the United States Government (USG) and the federal funding sponsors that support our faculty in their research and scholarly work.

As you know, the USG and our federal partners have shared concerns with all universities about international engagements and collaborations as to whether they are within compliance of the laws and regulations that govern these engagements. The focus on national security is ever evolving and it is our shared obligation to remain informed, diligent, and transparent in these collaborations to ASU and our Sponsors. To facilitate compliance, we continue to provide information, trainings, etc. as the requirements evolve. We have highlighted a list of resources, information to ensure ASU remains in compliance with laws and regulations and continues to support our research activities.

- [International Research and Global Collaborations](#) webpage. This webpage includes access to trainings such as the CITI Training module titled, "Undue Foreign Influence: Risks and Mitigations," [frequently asked questions](#), [Sponsor disclosure guidelines](#) and [additional resources](#) related to foreign travel, export control and conflict of interest disclosures. The information found on this webpage will provide you with an understanding of all things to be considered and understood in international engagement activities and covers topics such as reporting requirements, data privacy laws, federal security, and control regulations.
- [International Travel](#) requires approvals from ASU senior leadership and may require sponsor approval if funds are to be paid from a sponsored project. Prior to any foreign travel a best practice is review of our [international travel and exports](#) guidance.
- Export control regulations are federal laws that restrict the export of information, goods, technology and services to [foreign nationals](#), within and outside of the United States, and foreign countries of concern. Export controls apply to:
 - transfer of specified items or information to people or entities outside the U.S.
 - [Restricted Institutions, entities, and individuals](#)
 - disclosure of controlled information (whether in hard copy or orally) to certain foreign nationals inside or outside the U.S.
 - training or offering services involving controlled technology, equipment, or information to foreign nationals

- transactions with, or providing services to, certain foreign countries, entities or individuals that are named on the U.S. restricted party lists (this includes research travel to embargoed countries) [Sanctioned programs and Country Information](#)

The regulations are broad and apply to all activities not just research; and they do provide several exclusions or exemptions for activities that are fundamental in nature. In addition, there are some limitations on travel to embargoed countries, and any additional oversight for specific fields of research. For assistance in determining whether a project is subject to export controls, see the “[Export Control Wizard](#)” or visit [Research Integrity and Assurance - Export controls and security](#) or [request](#) a consult at export.control@asu.edu.

- ASU faculty and staff who have such collaborations are required to transparently provide full disclosure of all funded as well as unfunded collaborations and affiliations as required by federal and state agencies, as well as ASU’s policies.
- Conflicts of Commitments (CoC) and Conflicts of Interest (COI) should be disclosed to ASU and Sponsors. There is a wide range of situations where a conflict may occur such as consulting, sponsored funding, employment (nepotism), research and other scholarly activities. These [conflicts](#) are to be reported and updated routinely within your department and with ASU.
- Intellectual Property should be disclosed in accordance with [ABOR IP Policy](#).
- Comply with [ASU's Contract Signature Authority](#)
- International remote work is an increasingly common arrangement. International remote work is defined as an ASU employee who is working outside the United States. An employee could be working on sponsored or non-sponsored work. There are considerations and a process to be followed in determining if a remote work arrangement is in the best interest of the University Operations including research activities. The process and questionnaire to facilitate review of a request are located on [International Engagement and Collaboration](#) website under the heading “International Collaborations and Travel.” For further information or support, please contact export.control@asu.edu. Knowledge Enterprise (KE) is a resource to you and facilitates the ability for you to focus on your research. KE staff are available for consultation, training and workshops and they will continue to provide updated information policy changes that may impact your research.

Thank you for the work you do in support of ASU's excellence in research and innovation. If you have any questions about your responsibilities in this letter, please contact Heather Clark, Executive Director – Research Operations at 480-965-1427 or at heather.christina.clark@asu.edu.

Sincerely,



Matt Hulver
Vice President for Research | Knowledge Enterprise