

February 7, 2023

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 continue advance with this growth, impact, and success, it is important to ensure compliance requirements that come along with 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 openly exchange ideas and collaborations occurring outside the United States to advance knowledge. To ensure the continued 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 allows 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.

The USG and our federal partners continue to share their concerns with all universities about international engagements and collaborations related to how we comply with the 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 provide updated 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.
- Online training related to Undue Foreign Influence at: <https://about.citiprogram.org/>.
- [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

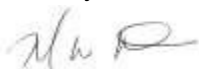
- transactions with, or providing services to, certain foreign countries, entities or individuals that are named on the U.S. restricted party lists (this includes research travel to embargoed countries) [Sanctioned programs and Country Information](#)

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) must be appropriately 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.
- We are working to implement a new solution to manage the disclosure of Conflict of Interest (COI) and Conflict of Commitment (COC) reporting in accordance with federal and state guidelines as well as ASU policies for faculty, staff and researchers. This will replace the current solution used for reporting for researchers within the Research Enterprise. Be on the lookout for launch dates.
- 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, Assistant Vice President–Research Operations at 480-965-1427 or at heather.christina.clark@asu.edu.

Sincerely,



Matt Hulver

Vice President for Research | Knowledge Enterprise