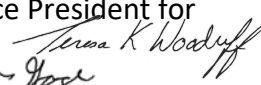
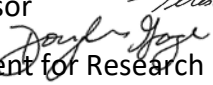


MICHIGAN STATE UNIVERSITY

Global Activities Electronic Disclosure:

TO: Faculty and Academic Staff
Deans, Directors and Chairpersons

FROM: Teresa K. Woodruff, Ph.D., Provost and Executive Vice President for
Academic Affairs, MSU Foundation Professor 
Douglas A. Gage, Ph.D., Interim Vice President for Research & Innovation 

SUBJECT: New disclosure requirement for principal investigators and key personnel,
whether or not they have global activities, due March 8, 2021

Date: January 13, 2021



Office of
**RESEARCH &
INNOVATION**

Michigan State University is an inclusive place of learning that welcomes and promotes international scholarship, partnerships, and exchanges. An essential, common element of scholarship, partnership, and respectful exchanges is candor, a virtue that is also required in extramural funding agreements. Undisclosed working relationships between scholars in U.S. institutions and non-domestic entities (e.g., universities, companies, and governments) have increasingly been a concern of federal agencies. In its absence, legitimate concerns arise over risk to objectivity of research, overcommitment of investigators relative to federal obligations, loss of U.S. intellectual property and attribution, and trade sanctions or export control violations. The message from federal agencies is that investigators in U.S. labs must disclose activities supported by non-domestic entities in grant applications and during awards. More description and resources from federal agencies are provided in the *Information* section below.

MSU has long had policies requiring approvals/disclosures through the Outside Work for Pay, Dual Appointments, and Conflict of Interest Policies. MSU is committed to complying with federal requirements, and we are working to reduce the legal risk and potential sanctions to our research members and to the university research enterprise. To support faculty in the required federal funding agency disclosures and to assist faculty in addressing any potential conflicts, the Office of Research & Innovation has developed the Global Activities e-Disclosure (GAED) web-based form to supplement other required disclosures. Some of the information provided on the form will overlap with other disclosures and processes. In the long-term, we anticipate combining and/or increasing the alignment of different disclosures, but because of the immediacy and intensity of the agencies' expectations, we are instituting the GAED form now. The GAED Form will ask if principal investigators, co-investigators, and key personnel (as defined by sponsor) have any current or pending, compensated or uncompensated collaborations, appointments, affiliations, or resources with or from any non-domestic entities. Generally, for Federal sponsors, the responses are in the context of identifying activities and resources related to

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or supporting an investigator's research endeavors.*¹ If the response is yes, additional fields must be completed to identify those global activities.

Responses will help MSU understand the scope of interactions with non-domestic entities and what assistance is needed to enable compliance with university and federal agency requirements. Submission of the GAED form by principal investigators, co-investigators and key personnel will be required for proposal submission to federal agencies sometime in the future. We encourage initial completion of the Form by March 8, 2021. The GAED Form can be accessed at: [Global Activities e-Disclosure](#) (log-in to the MSU system is required). Directions for completing the form are provided at: [Completing the Global Activities e-Disclosure](#). The University acknowledges the sensitivity of some personal information to be disclosed via the GAED. MSU will not publicly disclose GAED responses outside MSU when there exists neither a legal duty to disclose nor a significant public interest in public disclosure.*²

Questions on various types of disclosures can be addressed by contacting the responsible office on the [chart of commonly required disclosures for sponsored programs](#). Questions on the GAED Form can be directed to:

Brian Mattes, Faculty Conflict of Interest Officer, Faculty Conflict of Interest Office, at mattesbr@msu.edu

Laura Johnston, Asst. Director, Office of Sponsored Programs, at cooklau1@msu.edu

Katie Cook, Director, Office of Sponsored Programs, at farrkat1@msu.edu

Joseph R. Haywood, Asst. VP for Regulatory Affairs, Office of Regulatory Affairs, at haywoo12@msu.edu

Twila Reighley, Asst. VP for Research & Innovation, Sponsored Programs Administration, at reighley@msu.edu

Our thanks to each of you, in advance, for your prompt attention to this important disclosure.

**¹The initial GAED question with example questions is identified below (one yes/no response for the section); Frequently Asked Questions are accessible from the form directions or directly at our [website \(FAQs\)](#). Please remember: The Global Activities e-Disclosure does not limit the need to provide complete information on other disclosures such as Current and Pending/Other Support on grant applications, conflict of interest disclosures, export controls worksheet, intellectual property disclosure, etc. The Outside Work for Pay, Dual Appointments, and Conflict of Interest Policies apply to all external entities although MSU is focusing for this purpose on Global Activities.*

Do you have any current or pending, compensated or uncompensated collaborations, appointments, affiliations, or resources with any non-domestic entities that are related to or support your research endeavors? For instance, from non-domestic sources do you:

- Have personal compensation or in-kind contributions such as research funds, staff, laboratory space, or living expenses not through MSU?

- Participate or have you been selected to participate in talent programs or other non-domestic entity sponsored program(s)?
- Have non-domestic source academic, research, or institutional appointments (full-time, part-time, adjunct, honorary including investigator or key personnel status)?
- Have agreements not routed through MSU's Office of Sponsored Programs or Business-CONNECT?
- Host visiting scientists (faculty, graduate students, postdocs, or other) that support your research and/or are under your supervision?

**²The University undertakes appropriate cooperation with federal funding agencies, auditors, and law enforcement agencies in furtherance of the public interest, and federal whistleblower protection legislation, regulations, and funding award terms may also apply to some disclosures.*

Information regarding agency requirements:

Emerging federal guidance on undue outside influence can be reviewed at: [Outside Influence Guidance MSU OR&I](#). Federal offices are currently reviewing how well agencies and universities are protecting the United States' interest in government sponsored research. It is anticipated that requirements from the federal government will continue to evolve. Summarized below are a few key points that currently apply.

Disclosure requirements by agency, including examples of what must be included, can be found at: [Current and Pending-Other Support Requirements by Sponsor](#).

Included for reference are examples shared for NIH and NSF.

- Examples of other support for NIH:
 - The proposal being submitted, other proposals currently under consideration, and ongoing projects/awards, including MSU internal awards.
 - Positions and scientific appointments that are related to an individual's research endeavors, including affiliations with non-domestic entities or governments, regardless of whether or not remuneration is received. This includes unpaid appointments that provide access to lab space, research materials, and staff.
 - Consulting that is in "any way" related to a faculty member's research endeavors, regardless of whether or not remuneration is received.
 - Research conducted during the summer semester for faculty members with an Academic Year appointment, regardless of whether or not remuneration is received.
 - Participation in a non-domestic "talents" or similar program.
 - Financial support for laboratory personnel.
 - High-value materials that are not freely available (e.g., biologics, chemicals, model systems, technology, etc.).

- Start-up packages and support for research from entities other than the applicant institution, even if the research will be carried out at another institution.
- Examples of current and pending support for NSF:
 - The proposal being submitted, ongoing projects, and any proposal currently under consideration, from all sources, regardless of whether the support is provided through the proposing organization or is provided directly to the individual.
 - All resources made available to an individual that have an associated time commitment, and are in support of their research efforts, regardless of monetary value. However, if the resources are for the project being proposed they should be reported on the Facilities and Other Resources document rather than on the Current and Pending Support form.
 - Start-up packages from organizations other than the proposing organization.
 - Consulting arrangements where the individual will be conducting research as part of the agreement.

A short synopsis of federal agencies statements/actions about disclosing international collaborations, affiliations, activities, and/or interests follows:

- National Institutes of Health (NIH) - "Investigators, including subrecipient investigators, must disclose all financial interests received from a foreign institution of higher education or government of another country" . . .
- National Science Foundation (NSF) - U.S. universities must "embrace transparency and rigorously adhere to conflict of interest and conflict of commitment policies." "Since 1978, NSF has required senior project personnel on proposals to disclose all sources of support, both foreign and domestic. A renewed effort is now underway to ensure that existing requirements to disclose current and pending support information are known, understood, and followed."
- Department of Defense (DoD): DoD will require "key personnel to disclose all current and pending projects, time commitments to other projects, and funding sources at the time of application."
- Department of Energy (DOE) - "...federal and contractor personnel fully disclose and, as necessary, terminate affiliations with foreign government-supported talent recruitment programs.
- Department of Education (ED) – released information on comprehensive disclosure process for gifts, grants and contracts (required disclosure of funding >\$250,000 from non-U.S. entities under Section 117 under the Higher Education Act).

Note: The federal government uses 'foreign' entity and refers to the descriptor "undue foreign influence". MSU uses the language of 'non-domestic' to ensure our language describes geography.