MEMORANDUM TO: Principal Investigators
Research Staff
Deans and Associate Deans for Research
Departmental Research Administrators

FROM: Rafael Bras, Provost and Executive Vice President for Academic Affairs
Chaouki T. Abdallah, Executive Vice President for Research
Georgia Institute of Technology

SUBJECT: NIH Foreign Influence Memo from Dr. Francis Collins

DATE: September 17, 2018

Attached, you will find a letter sent to Georgia Tech and other NIH grant institutions, dated August 23, 2018, from Dr. Francis S. Collins, Director of the National Institutes of Health, titled “Statement on Protecting the Integrity of U.S. Biomedical Research.”

In his letter, Dr. Collins addresses three areas of concern, related to foreign entities that have “mounted systematic programs to influence NIH researchers and peer reviewers to take advantage of a long tradition of trust, fairness, and excellence of NIH-supported research activities.” These areas of concern include:

1) Failure by some researchers at NIH-funded institutions to disclose substantial contributions of resources from other organizations, including foreign governments, which threatens to distort decisions about the appropriate use of NIH funds;

2) Diversion of intellectual property in grant applications or produced by NIH-supported biomedical research to other entities, including other countries; and

3) In some instances, sharing of confidential information by peer reviewers with others, including in some instances with foreign entities, or otherwise attempting to influence funding decisions.

Here at Georgia Tech, we echo Dr. Collins’s concerns, and we remind our own research community of our institution’s commitment to the lawful conduct of research, and the need to “disclose all forms of other support and financial interests, including support coming from foreign governments or other foreign entities...in accordance with the NIH Grants Policy Statement, [on] all applications and progress reports.”

To that end, we encourage researchers to leverage the deep expertise in relevant compliance offices to ensure that all paperwork is in order. Only with complete information can the Institute guide and protect our faculty. In addition to the contracting officers who consistently review outgoing proposals and incoming awards for compliance, researchers have dedicated support teams available to them in the following areas:

- Conflict of Interest Management; Lead Contact: Jeff Steltzer, JD at jeff.steltzer@gtre.gatech.edu
- Export Control; Lead Contact: Mary Beran at mary.beran@gtre.gatech.edu
Intellectual Property Protection; Lead Contact: Kevin Wozniak at kevin.wozniak@gtc.gatech.edu

Dr. Collins indicated that the Office of Extramural Research (OER) will be providing additional information on this issue in the future. We, at Georgia Tech, have taken note of Dr. Collins’ letter and are committed to working with you to address research issues. We will communicate more information on this issue as it becomes available, including guidance on what and how to report foreign relationships on grant applications and progress reports.

Dr. Collins testified on August 23, 2018, before the Senate Health Committee and announced the formation of an Advisory Committee to the Director on Foreign Influences on Research Integrity, co-chaired by President Roy Wilson of Wayne State University and NIH Deputy Director Lawrence Tabak.

This committee is charged with:

- Identifying robust methods for accurate reporting of all sources of research support, financial interests, and affiliations;
- Mitigating risks to intellectual property security;
- Exploring additional steps to protect the integrity of peer review; and
- Carrying out these activities so as to emphasize the ongoing and valuable participation by foreign nationals in the American scientific enterprise.

While NIH has taken the lead on addressing this issue, we urge you to apply the same principles to all our research. We also urge you to continue to carry out research, that encourages participation by foreign nationals in the American scientific enterprise, while adhering to the guidelines set forth.

We will be following this issue and the advisory committee’s work closely and will keep you apprised.

Do not hesitate to contact us with any questions.

Useful Resources:

- Francis S. Collins, M.D., Ph.D.: “Statement on Protecting the Integrity of U.S. Biomedical Research.” August 23, 2018

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A Unit of the University System of Georgia  An Equal Education and Employment Opportunity Institution
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Dear Colleagues:

For many decades, the National Institutes of Health (NIH) and institutions like yours have participated in productive partnerships that greatly advance biomedical science. Scientists at universities and academic medical centers, supported by NIH, have made seminal biomedical discoveries that have led to dramatic improvements in human health. The scientists whose work NIH is proud to help support come from all over this country and the world, bringing rich, diverse perspectives and backgrounds to the biomedical research enterprise.

The NIH-funded biomedical enterprise depends on a competitive system, which, to be successful, must be fair, transparent, and trustworthy.

Unfortunately, threats to the integrity of U.S. biomedical research exist. NIH is aware that some foreign entities have mounted systematic programs to influence NIH researchers and peer reviewers and to take advantage of the long tradition of trust, fairness, and excellence of NIH-supported research activities. This kind of inappropriate influence is not limited to biomedical research; it has been a significant issue for defense and energy research for some time. Three areas of concern have emerged:

1. Diversion of intellectual property (IP) in grant applications or produced by NIH-supported biomedical research to other entities, including other countries;
2. Sharing of confidential information on grant applications by NIH peer reviewers with others, including foreign entities, or otherwise attempting to influence funding decisions; and
3. Failure by some researchers working at NIH-funded institutions in the U.S. to disclose substantial resources from other organizations, including foreign governments, which threatens to distort decisions about the appropriate use of NIH funds.

NIH is working with other government agencies and the broader biomedical research community, including NIH-funded institutions and U.S. university professional organizations, to identify steps that can help mitigate these unacceptable breaches of trust and confidentiality that undermine the integrity of U.S. biomedical research.

These efforts will be supported by a working group of the Advisory Committee to the (NIH) Director that will tap experts in academic research and security to develop robust methods to:

1. Improve accurate reporting of all sources of research support, financial interests, and relevant affiliations;
2. Mitigate the risk to IP security while continuing NIH’s long tradition of collaborations with foreign scientists and institutions; and
3. Explore additional steps to protect the integrity of peer review.

Concurrent with these efforts, we are using this opportunity to reach out to you for your help. We recently reminded the community\(^1\) that applicants and awardees must disclose all forms of other support and financial interests, including support coming from foreign governments or other foreign entities. We therefore expect you to work with your faculty and with your administrative staff to make sure that, in accordance with the NIH Grants Policy Statement,\(^2\) all applications and progress reports include all sources of research support, financial interests, and relevant affiliations.

In addition, in the weeks and months ahead you may be hearing from our Office of Extramural Research (OER) regarding grant administration or oversight questions or requests about specific applications, progress reports, policies, or personnel from, or affecting, your institution. We also expect and encourage your institution to notify us immediately upon identifying new information that affects your institution’s applications or awards. Lastly, we encourage you to reach out to an FBI field office to schedule a briefing on this matter. We greatly appreciate your willingness to work closely with OER to address these ongoing concerns.

We thank you in advance for working with us on this serious matter. Should you have questions, please send them to grantsinfo@od.nih.gov.

Sincerely yours,

Francis S. Collins, M.D., Ph.D.
Director, NIH

\(^2\) https://grants.nih.gov/policy/nihgps/index.htm