Weill Cornell Medicine

Research Administration Platform for *Innovation* and *Discussion*

R.A.P.I.D.



Weill Cornell Medicine

Foreign Influence on Research Integrity

presented by R.A.P.I.D.



Agenda

- Overview & Event Timeline
- General Findings
- Foreign Influence (what and how?)
- Cases
- Q&A Guest Panel
- Fund to WBS
- Salute



Foreign Influence Overview

August 2018

• "Dear Colleagues" Letter

Aug

 Director's Statement on Protecting the Integrity of US Biomedical Research

Aug

 Advisory Committee to the Director (ACD) formed a topical work group

December 2018

 ACD publishes findings & recommendations*

February 2019

- NIH communicates PI specific concerns to institutions
- (approx. 180 letters)

Feb

 Institutions research, review and respond to inquiries

Foreign Influence Overview

Feb

 PI's awards are placed on hold or terminated, funds are reimbursed to NIH, and in some cases more serious charges are brought

June 2019

 CU publishes a message to Research Faculty on Academic Integrity and Undue Foreign Influence

March 2019

 CU President Martha Pollack publishes an opinion piece on Undue Foreign Influence

June

 Council on Government Relations (COGR) publishes summary of the history of Foreign Influence

Mar

Dozens of News Articles Published

June

 NIH publishes FAQs on Other Support and Foreign Components Revised July 23, 2019

Foreign Influence Overview

July 2019

 Association of American Medical Colleges (AAMC) publishes memo on Undue Foreign Influence

July

 NOT-OD-19-114 "Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components"

July

 Michael Lauer, Deputy Director for Extramural Research, posts NIH "Open Mike" Clarifying Long-Standing NIH Policies on Disclosing Other Support

July 2019

 NIH publishes revisions to FAQs on Other Support and Foreign Components

July

 Forum on Conflict of Interest (FOCI) publishes a statement in response to "Open Mike" and inclusions in Other Support saying concerns will be reviewed

July

Bringing us to today

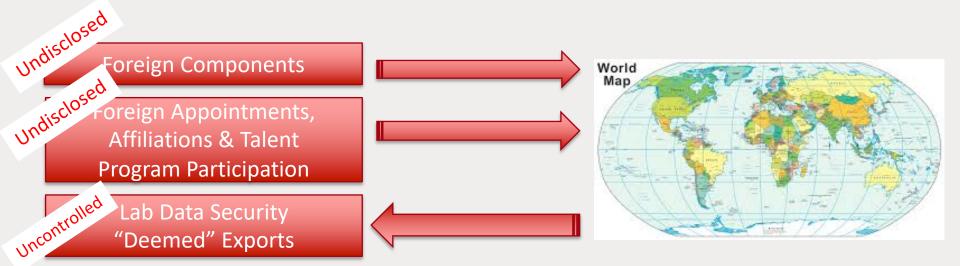
Undue Foreign Influence

Federal Findings

- 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

Undue Foreign Influence ("what?")

Mechanism ("how?")



Deemed Export Controls: Releases of **controlled** technology to foreign persons in the U.S. are "**deemed**" to be an **export** to the person's country or countries of nationality.

Undue Foreign Influence ("what?")

- How pervasive is this influence?
- How do we protect federal funding?
- How do we protect intellectual property?



Pathway to Discovery

How did the NIH discover undisclosed information and undue foreign influence?

- 1. Review of NIH supported publications meta-data included in annual reports (RPPRs)
- Observation and reports of excessive foreign travel
- 3. Other forms of direct investigation by federal agencies



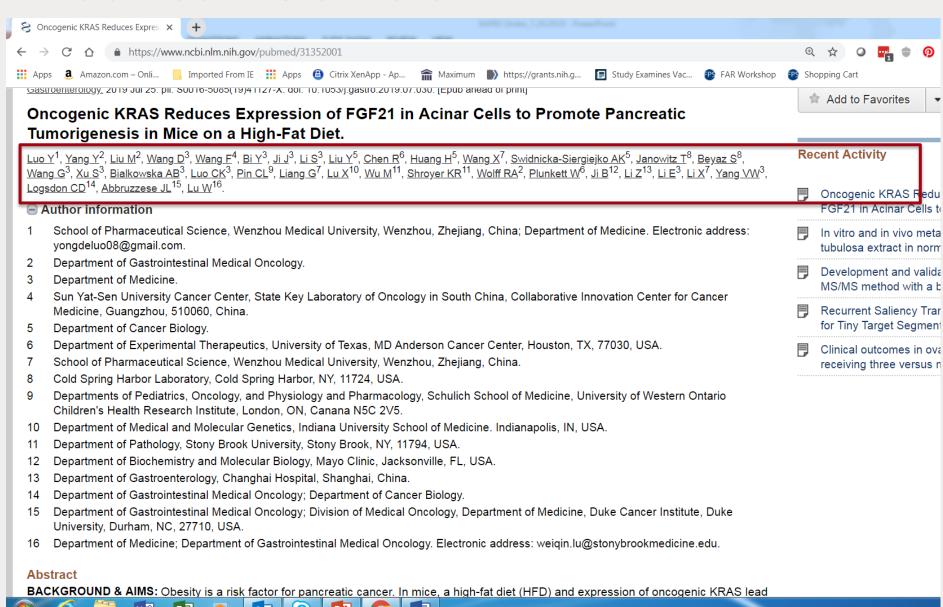
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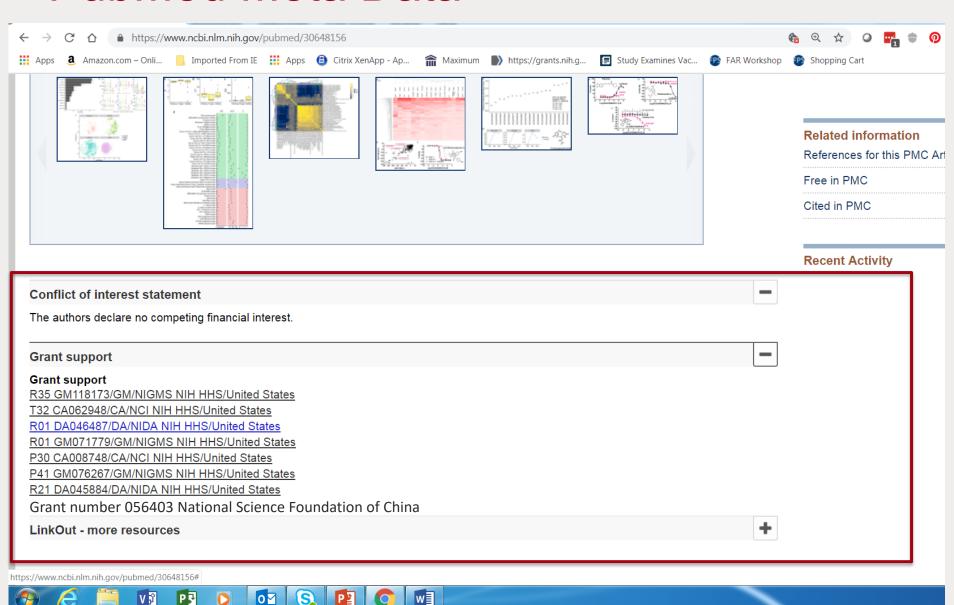
- 1. Crosscheck authors against grant application and subsequent reports
- 1. Unreported authors
- 2. Review author information i.e. institutional credit and compare to Biosketch & Other Support
- 1. Unreported Affiliations and Appointments (with financial benefits)
- Crosscheck grant support and find grants not listed on any Key Personnel "On-Going Support" or "JIT - Other Support"
- 1. Unreported grants



PubMed Meta Data



PubMed Meta Data



Q&A – Case #1 – Independent R01

NIH Concerns

 PI has undisclosed international authors with credit to associated international affiliations

i.e. an undisclosed Foreign Component

- PI has undisclosed international affiliations and appointments of his or her own
- PI has multiple undisclosed international grants
- PI is/was participating in an undisclosed Talent Program

Consequences

Pl's grants placed on hold (indefinitely)
No determination timeline provided



Q&A – Case #2 – R01 Multi PD/PI, Multi-Institution

NIH Concerns

 PI at another institution has undisclosed international authors and affiliations credited

i.e. an undisclosed Foreign Component

Consequences

- The NIH placed the award in a pending status while investigating the PI (no determination timeline)
- Pl's at other institutions were not provided with any notification about the grant being placed on hold or the reasons why

Dean's Memorandum July 18, 2019

Provides methods by which to disclose previously undisclosed information

Q&A Discussion

- Adam Garriga, Chief Administrative Officer, Research
- Thomas Blair, Chief Research Compliance Officer
- Jim Kahn, Deputy University Counsel (UC)
- Brian Tschinkel, Chief Information Security Officer (ITS)
- Michele Fuortes, Assistant Professor (ITS)

