

Research Compliance Program









**Proposal Submission** 

Award and Account Establishment

After Research Commences Closeou

#### Introduction

While USC supports the widest range of research engagement and collaboration, international activities and collaborations carry responsibilities that may not be readily apparent. The United States government, as well as a range of federal sponsors, have expressed growing concerns regarding inappropriate influence by external entities over federally-funded research and are requiring greater transparency from both institutions and faculty when it comes to their global engagements and affiliations.

#### 1. No Disclosure Needed



- a. Research Collaborations (foreign and domestic not including foreign components)

   collaboration on a research paper or project with a foreign researcher does not require disclosure unless the researcher is helping you complete an aim of a federally sponsored research project or is providing you with research support.
- b. Occasional honoraria and/or travel support (under \$5,000 per year) – e.g., traveling to speak at a foreign university and accepting a reasonable honorarium payment does not require disclosure.

## 2. Disclosure Required



- Outside Appointments (foreign and domestic) – outside appointments require disclosure to USC via disClose and on your biosketch in any grant proposals.
- Other Support (foreign and domestic) –
   Other support includes all resources made
   available to researchers or senior key
   personnel in support of their research
   endeavors, regardless of whether the
   resources have monetary value.
- Foreign Components/International Activities

   if you will be conducting part of a federally sponsored project outside the US or with collaborators outside USC, this must be disclosed to the sponsor in your proposal or progress report.

NOTE: NIH requires prior approval if these are not listed in your proposal or RPPR

# 3. High-Risk Collaborations (Please contact OCEC for guidance before proceeding)



- Participation in a Foreign Talent Program Foreign-government-sponsored talent recruitment programs ("talent programs") are an effort to recruit researchers to work in a foreign lab to further the foreign nation's economic development plan and or national security or military goals. These appointments are usually through a foreign university and can be full-time or part-time. If you are asked to participate in a talent program, contact the Office of Culture, Ethics and Compliance.
- Outside activity of more than one day per week – Any activity in excess of one day per week requires Provost approval.
- c. Activity with banned entities/countries travel to OFAC-sanctioned countries (e.g., Iran, Cuba, North Korea) may be prohibited or severely restricted. If you plan to travel to one of these destinations, or work with researchers located there, contact OCEC for guidance well in advance of the anticipated travel.

## **More Resources**



OCEC website: <a href="https://ooc.usc.edu/compliance-programs/international-activity/international-collaborations-and-disclosure-requirements/">https://ooc.usc.edu/compliance-programs/international-activity/international-collaborations-and-disclosure-requirements/</a>

