

Frequently Asked Questions Disclosure and Reporting Requirements for Foreign and Domestic Activity

1. What are the most common situations where one should disclose or report collaborations and international activities?

- a) When **submitting a proposal** to the US Government or whenever the RFP or guidelines request such disclosure.
- b) When participating in **outside activities** involving professional activities and financial relationships outside your normal course of business. (See #3 & 4 below)
- c) To comply with **US export control** regulations
 - When accepting publication restrictions in research
 - When traveling internationally and attending conferences
 - When participating in international collaborations
 - When hosting international staff and students and international visitors (See #12 below)
 - When shipping materials internationally
 - When engaging in any international financial transactions
- d) To report **significant financial conflicts of interest** (\geq \$5,000) associated with proposals, protocols, licensing and contracting.
- e) To comply with the University **Intellectual Property Policy** and sponsored research contracts.
- f) To properly **host international visitors** (see #2e and 12 below).

2. What are the most common ways to disclose or report collaborations and international activities?

- a) **Current and Pending Support** - Provide a complete disclosure of all foreign and domestic support on your current and pending support when completing your grant proposals. Initiate your grant requests at least 3 weeks ahead of the deadline by completing a proposal worksheet through the [Proposal Information Portal \(PIP\)](#).
- b) **Reportable Outside Activity** - Disclose your outside professional activities and financial relationships, compensated or uncompensated, through the [Outside Activity Database](#). These include summer activities of academic year faculty.
- c) **Financial Conflicts of Interest** - Disclose research related Significant (\geq \$5,000) Financial Interests (SFI), including payments and travel reimbursements received from other entities (Disclosed as part of #2b). Purdue Investigators are required to submit Research SFI disclosures using the [Proposal Driven Disclosure online application](#). A separate Disclosure Form is required for each entity in/with which you have an SFI related to your sponsored projects at Purdue University.
- d) **Intellectual Property** – Disclose your IP when it is created before, during or after a research project, and prior to incorporating intellectual property into a proposal, into a research project or publishing your results. To disclose you should use the [IP Disclosure Form](#)
- e) **Hosting Visitors** – Verify your visitor is not from a restricted party. Please follow the instructions on the [Hosting International Visitors](#) site prior to extending an invitation (See #12 below).

3. Who should report outside activities?

All exempt University Employees, whether part time or full time, are required to submit a form before they engage in any Reportable Outside Activities. Nonexempt (clerical and service) staff members are required to submit a form only if they engage in a Reportable Outside Activity that interferes with their normal University duties. Generally, activities of nonexempt staff members that occur outside scheduled work hours or during leave do not require approval.

4. What constitutes a reportable outside activity?

A Reportable Outside Activity is defined as any work, advice or service for an entity other than Purdue University that may potentially result in a Conflict of Commitment.

Below is a list of examples of reportable activity:

- Participation in any business enterprise as owner, partner, officer, supervisor, manager or in any capacity with management responsibilities
- Service as an officer, director, trustee or public representative of a professional association, educational institution, nonprofit organization, national commission or board, or foundation
- Consulting (see #5 below)
- Having responsibility for any course at, or representing oneself as a faculty member at, any other school or university
- Conducting external research that would not ordinarily be conducted as a part of the employee's duties with the university
- Service on an advisory council or scientific advisory board of a company or organization other than a state or federal agency
- Volunteer work that involves a commitment of time that may interfere with the employee's ability to fulfill his or her responsibilities to the University
- For exempt employees, including faculty members, any other employment with or service to an outside entity where compensation in the form of money, services, goods or other consideration of value is received

You do not need to submit a Reportable Outside Activity Form for the following activities:

- Non-professional activities such as: Volunteer work that does not interfere with the employee's ability to fulfill his or her responsibilities to the University (e.g., volunteer work that takes place outside of the regular business or instructional hours of the University)
- Hobbies or recreational activities
- Religious activities
- Preparing and publishing scholarly communications such as books, articles and other creative works
- Peer review of manuscripts and grant proposals
- Editing of scholarly or professional publications or service on editorial boards for such publications
- Attending or presenting at events sponsored by professional organizations or academic institutions, such as professional meetings, workshops, colloquia, symposia, seminars or training programs (See # 6 below)
- Visiting other sites in connection with accreditation, audits, sponsored project reviews or like activities

5. What constitutes reportable consulting activity?

An Employee's use of his or her professional capabilities and knowledge for the benefit of a third party in return for immediate or prospective gain. Consulting does not generally include service without compensation, or with honoraria less than \$1,000 annually performed for:

- governmental agencies and boards,
- granting agency peer-group review panels,
- advisory groups for other universities or
- similar capacities primarily for the purpose of providing a public or University service.

6. If you are giving a talk or presenting a paper at an event sponsored by professional organizations or academic institutions, such as professional meetings, workshops, colloquia, symposia, seminars or training programs, when should you disclose or report this activity?

As long as you are sharing information that is published, or the results of fundamental research (i.e. research that we have not accepted a publication restriction for), there is nothing to report unless the activity qualifies as consulting or reportable outside activity. (see #4 & 5 above)

7. In the course of your work you have publications with coauthors from different countries, do you need to update Purdue about this?

The main reporting requirement related to publications is disclosures of Financial Interests. This is typically to journals and professional organizations. It is always good practice to also notify students, collaborators, trainees and human subjects of any financial interests and potential conflicts. This applies foreign and domestic.

8. You have funds coming to Purdue from an internationally sponsored grant program. You also receive some direct support in the summer from international organizations. Should these be reported in your current and pending support profile and how do you ensure the sponsors are not a restricted party?

Yes, both of these should be reported in your current and pending (C&P) support profiles. Pre-Award in Sponsored Program Services should have access and pull information on awards that come into and are administered by Purdue. You will have to add the direct support yourself. The important reminder is to include all support in your C&P. SPS and Export Control will run a visual compliance check on all foreign sponsors at the time of proposal, contract negotiation and/or award acceptance based. As long as the University knows about the support it can run the check.

9. If a graduate student receives direct support from an international sponsor does this support need to be disclosed?

There is no obligation to report if the student is receiving direct support. The obligations would kick in for the student supported on a project proposal or award when the funding agency requires a list of current and pending support for all project personnel. In this case the student should list the direct support received.

10. When traveling internationally your travel is reimbursed by a foreign entity (typically a university there) do you need to report this or is your travel authorization and subsequent travel reimbursement sufficient?

Accepting payment is a form of support and should be listed on your disclosures of significant financial interest when reporting potential conflicts of interest. Guidance on traveling internationally can be found at: <https://www.purdue.edu/research/regulatory-affairs/export-controls-and-research-information-assurance/international-travel.php>

11. When traveling internationally are there export control concerns about traveling with your University laptop or other devices?

You should carefully consider what is on the device. If you had a controlled project, Purdue would have a Technology control plan in place with you to address how that data should be handled. Without such a plan, you are encouraged to review the recommendations found at [https://travel.state.gov/content/dam/NEWTravelAssets/pdfs/FBI%20business-travel-brochure%20\(2\).pdf](https://travel.state.gov/content/dam/NEWTravelAssets/pdfs/FBI%20business-travel-brochure%20(2).pdf)

If you have the option of taking a separate computer for international travel, that would certainly reduce the risk of you data being accessed, but if that isn't an option, than it is suggested to remove any unpublished research data before you go.

12. You intend to invite international visitors to campus, is there an official protocol?

To limit the possibility of an export control violation occurring as a result of an international visit to campus, the University reviews each visit for the following:

- Is the visitor or the visitor's institution a prohibited party on a **U.S. Government Restricted Party List**? Such lists are maintained by various federal agencies and identify persons and entities who have been convicted of export control violations.
- Does the hosting faculty member/laboratory have controlled research projects? If so, does the applicable technology control plans need to be revised to address the visitor's presence within the lab?

If a visitor or their institution is on a restricted party list or the visit presents too high of a risk of an export control violation, the visit may not be approved to ensure that this risk analysis occurs before an invitation is formally made. Please follow the instructions on the [Hosting International Visitors](#) site prior to extending an invitation.

13. Purdue states in its campus letter of November 08, 2018 that "compliance with various regulations requires that Purdue will not host visitors, enter into contracts, do business, or engage in any activity with entities listed on a United States Government Restricted Party List. The University reserves the right to restrict additional parties based on emerging US Government legislative or administrative guidance, or when it is otherwise in the University's best interest." What does this mean for your Purdue Activities?

It is the policy of Purdue University (i) to comply with all Export Controls and OFAC (U. S. Department of Treasury Office of Foreign Assets Control) Regulations applicable to University activities, and (ii) to develop and maintain an EC Compliance program to enable Purdue Associates to understand and comply with these laws and regulations. No Purdue Associate may engage in any activity, or commit the University to engage in any activity, (i) that is prohibited by

Export Controls or OFAC Regulations, or (ii) that requires a license or other agency approval under Export Controls or OFAC Regulations, unless such license or approval has been obtained.

The U.S. government restricts certain persons, entities and destinations. These restrictions are maintained by several federal agencies, including but not limited to the State, Treasury and Commerce Departments, on various lists. When a person or entity is on such a list, U.S. entities are expected to do additional due diligence to ensure that any proposed interaction doesn't involve an activity that is prohibited by U.S. law. If a proposed sponsor, subcontractor or international visitor is believed to be on one of these lists, the Export Control/Information Assurance Team must review the situation to determine if a license is required or if the activity can be approved. The federal government maintains a free [website](#) which searches against all such lists.

In addition, sometimes the University is aware of circumstances and situations that necessitate the restriction of additional parties based on emerging US Government legislative or administrative guidance, or when it is otherwise in the University's best interest to do so. These decisions could result in specific sponsorships or collaborations being denied or a restriction on hosting visitors. In these cases, the restrictions will be closely monitored and if the circumstances and situations change the restriction on the sponsors, collaborators and visitors will be lifted.

Purdue University values international collaboration with researchers from around the world and welcomes students and scholars to campus from all parts of the globe. These international collaborations and educational opportunities are essential to successful fulfilment of our mission to move the world forward.