



July 9, 2019

Members of the Michigan Tech Campus Community:

Michigan Tech is committed to the principles of academic freedom (Faculty Handbook, Sec 1.7 Academic Freedom) and to the use of our research products to “... *improve the quality of life and to promote mutual respect and equity for all people within the state, the nation, and the global community*” (Michigan Tech Strategic Vision and Board of Trustees Policy 15.3 Research Data Principles). Research is a global enterprise, and international collaborations and educational opportunities are essential to our research and educational activities.

Michigan Tech and all other US educational institutions must comply with federal reporting and disclosure requirements. Recently, Dr. Francis Collins, Director of the National Institutes of Health, reminded the broad research community of the need to “...*disclose all forms of other support and financial interests, including support coming from foreign governments or other foreign entities...*”. Michigan Tech’s Conflict of Interest Policy (Board of Trustees Policy 4.7 Conflict of Interest Policy) and Procedures (Faculty Handbook Appendix B) **require the disclosure of activities that may create a financial conflict of interest or more generally a conflict of commitment, whether compensated or not, to your immediate supervisor and, under some conditions, to the Conflict of Interest Coordinator.** These activities must also occasionally be disclosed to comply with federal guidelines; the NIH Grants Policy Statement requires such disclosure on all applications and progress reports, and the National Science Foundation requires disclosure on the Current and Pending support documents accompanying proposals.

University faculty, staff, and students are also required to comply with export control laws and regulations. Whenever there is a sponsored agreement with a foreign entity, whether corporate or governmental, the Sponsored Programs Office conducts a review to ensure that the University does not enter into contracts, do business, or engage in any activity with entities on a United States Government Restricted Party list. The University strongly recommends that members of the campus community do not take personal internet devices on international travel, and that **if traveling internationally to ensure that there are no research data or personal protected information stored on any device, even if encrypted.** Information Technology will provide you with advice and temporary devices to minimize, but not eliminate, risk due to cyber security concerns.

To conclude, any external support or engagement that you would acknowledge in a presentation or publication must generally be disclosed in funding applications and through the University Conflict of Interest Procedures. It is critical for all members of the campus community to be transparent, particularly with respect to any affiliations with foreign entities. Your disclosure is required by University policy and procedures and for the University to be in compliance with federal guidelines. Only through disclosure can the University advise, assist, and protect you and the integrity of your scholarly activities.

The situation regarding specific federal requirements is undergoing change. If you have any questions regarding federal regulations or internal Conflict of Interest Procedures please contact Jim Baker, Associate Vice President for Research Administration at 487-2226.

Sincerely,

David Reed
Vice President for Research

Jackie Huntoon
Provost and Senior Vice President for Academic Affairs