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## FEDERAL RESEARCH

# Agency Actions Needed to Address Foreign Influence

Statement of Candice N. Wright, Director,  
Science, Technology Assessment, and Analytics

Accessible Version

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# GAO Highlights

Highlights of [GAO-22-105434](#), a testimony before the Subcommittees on Investigations and Oversight and Research and Technology, Committee on Science, Space, and Technology, House of Representatives

## Why GAO Did This Study

The federal government reported expending about \$44.5 billion on university science and engineering research in fiscal year 2019. Safeguarding the U.S. research enterprise from threats of foreign influence is of critical importance. Recent reports by GAO and others have noted challenges the research community faces in combatting undue foreign influence while also maintaining an open research environment that fosters collaboration, transparency, and the free exchange of ideas.

This testimony discusses, among other things, (1) COI policies and disclosure requirements at selected agencies and universities that address potential foreign threats, and (2) mechanisms to monitor and enforce policies and requirements. It is based on a report that GAO issued in December 2020 ([GAO-21-130](#)).

## What GAO Recommends

In its December 2020 report, GAO made nine recommendations to six agencies, including that grant-making agencies address non-financial conflicts of interest in their COI policies and develop written procedures for addressing cases of failure to disclose required information. Five agencies concurred with GAO's recommendations. The NSF neither agreed nor disagreed with GAO's recommendation. All agencies have taken steps to improve their conflict of interest policies but have yet to fully implement the recommendations.

View [GAO-22-105434](#). For more information, contact Candice N. Wright at (202) 512-6888 or [wrightc@gao.gov](mailto:wrightc@gao.gov).

October 2021

# FEDERAL RESEARCH

## Agency Actions Needed to Address Foreign Influence

## What GAO Found

U.S. research may be subject to undue foreign influence in cases where a researcher has a foreign conflict of interest (COI). Federal grant-making agencies such as the National Science Foundation (NSF) can address this threat through COI policies and requiring the disclosure of information that may indicate conflicts. In a December 2020 report, GAO reviewed five agencies, including NSF, which together accounted for almost 90 percent of all federal research and development expenditures at universities in fiscal year 2018. GAO found that three of the agencies it reviewed have agency-wide COI policies and two do not (see figure). The three agencies with existing COI policies focus on financial interests and do not specifically address or define non-financial interests, which may include multiple professional appointments. In the absence of agency-wide COI policies and definitions for non-financial interests, researchers may not fully understand what they need to report on their grant proposals, leaving agencies with incomplete information to assess the risk of foreign influence.

Elements of Conflict of Interest (COI) Policies at Selected Agencies

	National Science Foundation	National Institutes of Health	National Aeronautics and Space Administration	Department of Defense	Department of Energy
Agency-wide COI policy	✓	✓	✓	No Agency-wide COI Policy	
Addresses financial COI	✓	✓	✓		
Addresses non-financial COI	—	—	—		

Source: GAO analysis of agency documents. | GAO-22-105434

Data table for Elements of Conflict of Interest (COI) Policies at Selected Agencies

Agency	Agency-wide COI policy	Addresses financial COI	Addresses non-financial COI
National Science Foundation	YES	YES	NO
National Institutes of Health	YES	YES	NO
National Aeronautics and Space Administration	YES	NO	NO
Department of Defense	No agency-wide COI Policy		
Department of Energy	No agency-wide COI Policy		

Source: GAO analysis of agency documents. | GAO-22-105434

In the report, GAO found that agencies were working with the Office of Science and Technology Policy (OSTP) on efforts to protect federally funded research and were waiting for OSTP to issue guidance on addressing foreign influence before updating their policies. In January 2021, the White House and OSTP issued documents for agencies and research organizations, respectively, on actions to strengthen protections for federally funded research against foreign

influence. As of September 2021, OSTP is working on implementation guidance for agencies, due to be issued in November 2021.

All five agencies have mechanisms to monitor and enforce COI policies and requirements. While most agencies collect non-financial information, such as details of foreign collaborations, agencies rely on universities to monitor financial conflicts. All five agencies have enforcement mechanisms for responding to an alleged failure to disclose required information, however, only NSF and the National Institutes of Health have written procedures for such allegations. In addition, agencies have referred cases for criminal investigation, among other enforcement actions, where they identified researchers who failed to disclose required information.

Chairman Foster, Chairwoman Stevens, Ranking Members Obernolte and Waltz, and Members of the Subcommittees:

Thank you for the opportunity to discuss our December 2020 report on foreign influence in federally funded research.<sup>1</sup> The federal government reportedly expended about \$44.5 billion on university science and engineering research in fiscal year 2019.<sup>2</sup> Safeguarding U.S. taxpayers' investment in federally funded research from undue foreign influence is of critical importance. Recent reports by GAO and others have noted challenges faced by the research community to combat undue foreign influence, while maintaining an open research environment that fosters collaboration, transparency, and the free exchange of ideas.<sup>3</sup> For example, we recently reported on the risk foreign students working at U.S. research universities may pose by transferring sensitive knowledge they gain to their home countries.

In August 2018, the Director of the National Institutes of Health (NIH) sent a letter to over 10,000 universities highlighting concerns over foreign government talent recruitment programs, noting that these programs can influence researchers receiving federal funding to divert intellectual

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<sup>1</sup>GAO, *Federal Research: Agencies Need to Enhance Policies to Address Foreign Influence*, [GAO-21-130](#) (Washington, D.C.: Dec. 17, 2020).

<sup>2</sup>See National Science Foundation's "Higher Education Research and Development" survey on research and development expenditures provided to higher education institutions in the United States and outlying areas. These were the most recent data available at the time of this testimony. Funding data for fiscal year 2020 have yet to be released.

<sup>3</sup>GAO, *Export Controls: State and Commerce Should Improve Guidance and Outreach to Address University-Specific Compliance Issues*, [GAO-20-394](#) (Washington, D.C.: May 12, 2020). United States Senate, Permanent Subcommittee on Investigations, Committee on Homeland Security and Governmental Affairs, *Threats to the U.S. Research Enterprise: China's Talent Recruitment Plans*, (Washington, D.C.: November 2019).

property and federally funded research to other countries.<sup>4</sup> The letter also highlighted concerns that some researchers who receive federally funded grants did not disclose financial and other resources provided by foreign governments. For example, in May 2020, a former researcher at one U.S. university pleaded guilty for not reporting hundreds of thousands of dollars in foreign income on his federal tax returns, in relation to his involvement in the Thousand Talents Program, a Chinese-government talent recruitment program.<sup>5</sup> This case came to light after the agency reviewed the researcher's grant proposals and became concerned that he had failed to disclose, among other things, foreign research activity.<sup>6</sup>

My testimony today summarizes the findings in our December 2020 report on foreign influence in federally funded research. Specifically, it discusses (1) the extent to which selected agencies and universities have conflict of interest policies and disclosure requirements that address potential foreign influence, (2) the extent to which selected agencies have mechanisms to monitor and enforce policies and requirements, and (3) the views of selected stakeholders on how to better address foreign threats to federally funded research. For the report, we reviewed relevant laws, regulations, federal guidance, conflict of interest policies and

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<sup>4</sup>Department of Health and Human Services, National Institutes of Health, "Dear Colleague" letter to university and academic medical school officials (Bethesda, Md.: Aug. 20, 2018). According to the National Science and Technology Council, JCORE Subcommittee on Research Security, a foreign government sponsored talent recruitment program is an effort directly or indirectly organized, managed, or funded by a foreign government, including state-owned enterprises, or a foreign institution to recruit science and technology professionals or students (regardless of citizenship or national origin and whether having a full-time or part-time position). The Council further noted that some programs are sponsored for legitimate purposes, but other programs include requirements that create conflicts of interest for researchers, including some that have been shown to encourage or direct unethical and even criminal behaviors. National Science & Technology Council. *Recommended Practices for Research Organizations Regarding Research Security and Integrity*, (Washington, D.C.: January 2021).

<sup>5</sup>Department of Justice press release, *Former Emory University Professor and Chinese "Thousand Talents" Participant Convicted and Sentenced for Filing a False Tax Return*, (Washington, D.C.: May 11, 2020) available at <https://www.justice.gov/opa/pr/former-emory-university-professor-and-chinese-thousand-talents-participant-convicted-and>. According to a Senate subcommittee report, the Thousand Talents Plan, launched in 2008, incentivizes individuals engaged in research and development in the United States to transmit the knowledge and research gained to China in exchange for salaries, research funding, lab space, and other incentives. United States Senate, Permanent Subcommittee on Investigations, *Threats to the U.S. Research Enterprise*.

<sup>6</sup>This researcher worked simultaneously at Emory University performing federally funded biomedical research, and at two Chinese universities performing similar research. The agency's review prompted the university, and later federal law enforcement, to investigate the matter, which revealed the filing of false tax returns.

requirements, and interviewed agency officials, university officials, and researchers about agency and university conflict of interest policies and disclosure requirements. For this testimony, we asked the agencies we reviewed to provide updates on any steps taken to address the recommendations in our December 2020 report, and updated the recommendation status of selected agency activities, as appropriate.

This testimony, as well as the report, focuses on the top five agencies with the largest amount of funding for federal research, and which together accounted for almost 90 percent of all federal research and development expenditures at universities in fiscal year 2018—the Department of Defense (DOD), the Department of Energy (DOE), the National Aeronautics and Space Administration (NASA), NIH, and the National Science Foundation (NSF). We also selected 11 universities, each of which received over \$500 million in combined research grant funding in fiscal years 2018 and 2019 from two or more of the five selected agencies. Additional information on our scope and methodology is available in our December 2020 report. Our work was performed in accordance with generally accepted government auditing standards.

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## Background

Federal agencies that fund research have a strong interest in ensuring that the underlying research is scientifically rigorous and free of bias such as foreign influence. Two tools that agencies may use to address foreign influence are conflict of interest policies and disclosure requirements, such as foreign affiliations and current and pending research support. Among other things, conflict of interest policies help to guard against the influence of researcher's financial interests or conflicts in the design, conduct, and reporting of federally funded research. Agencies may also require researchers to disclose information about their affiliations, associations, and activities which may indicate potential non-financial conflicts, such as conducting the same research for both the U.S. federal government and a foreign government.

In May 2019, the White House Office of Science and Technology Policy's (OSTP) National Science and Technology Council established the Joint Committee on the Research Environment (JCORE) to address issues related to the safety, integrity, and productivity of the research environment, including balancing an open research environment with

national security concerns.<sup>7</sup> The JCORE Subcommittee on Research Security focused on developing (1) appropriate and effective risk management for federal agencies and research institutions; (2) consistent, coordinated, and effective outreach to and engagement with academic and research institutions; (3) coordinated guidance for federal agencies; and (4) recommendations for best practices for academic and research institutions. This committee has worked closely with federal grant-making agencies, security agencies, and the research community to develop guidance on addressing foreign threats.

In January 2021, as part of the initiative, the JCORE Subcommittee on Research Security released a guidance document, *Recommended Practices for Research Organizations Regarding Research Security and Integrity*. The document highlighted the risks associated with foreign influence and made recommendations to universities and other research organizations on actions they can take to better protect the security and integrity of America's research enterprise.<sup>8</sup> Further, the document serves as complementary guidance to the National Security Presidential Memorandum 33 (NSPM-33), which was issued on January 14, 2021 directing agency actions to strengthen protections of U.S. government supported research and development against foreign government interference and exploitation. Both the guidance document and the memorandum include similar definitions related to conflicts of interest:<sup>9</sup>

**Conflict of interest (financial conflict of interest):** A situation in which an individual, or the individual's spouse or dependent children, has a

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<sup>7</sup>Specifically, OSTP documents noted that JCORE will examine administrative burdens in federally funded research; integrity in research; safe, inclusive, and equitable research settings; and open research environments balanced with security.

<sup>8</sup>National Science & Technology Council. *Recommended Practices for Research Organizations Regarding Research Security and Integrity*, (Washington, D.C.: January 2021).

<sup>9</sup>These definitions are similar to those previously shared by the JCORE Subcommittee on Research Security in June 2020. The White House Office of Science and Technology Policy, *Enhancing the Security and Integrity of America's Research Enterprise*, (Washington, D.C.: June 23, 2020).

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financial interest or financial relationship that could directly and significantly affect the design, conduct, reporting, or funding of research.<sup>10</sup>

**Conflict of commitment (non-financial conflict of interest):** A situation in which an individual accepts or incurs conflicting obligations between or among multiple employers or other entities. Many institutional policies define conflicts of commitment as conflicting commitments of time and effort, including obligations to dedicate time in excess of institutional or funding agency policies and commitments. Other types of conflicting obligations, including obligations to improperly share information with, or to withhold information from, an employer or funding agency, can also threaten research security and integrity, and are an element of a broader concept of conflicts of commitment.<sup>11</sup>

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## Agencies Have Policies and Disclosure Requirements Generally Focused on Financial Conflicts of Interest

In our December 2020 report, we found that NSF, NIH, and NASA have agency-wide conflict of interest policies that require researchers to report certain financial interests, while DOD and DOE do not. We found that agency-wide conflict of interest policies require universities to develop their own policies and include specific requirements for identifying conflicts of interest.<sup>12</sup> In addition, all agencies we reviewed have disclosure requirements, which are generally found in grant funding announcements and ask the researcher to provide information such as

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<sup>10</sup>*Presidential Memorandum on United States Government Supported Research and Development National Security Policy*, National Security Presidential Memorandum 33, (Jan. 14, 2021). Unless otherwise noted, when discussing conflicts of interest in this report, we are referring to both financial conflicts of interest and non-financial conflicts of interest (also referred to as conflicts of commitment). The memorandum's definition does not include the term "financial conflict of interest."

<sup>11</sup>*Presidential Memorandum on United States Government Supported Research and Development National Security Policy*, National Security Presidential Memorandum 33. The memorandum's definition does not include the term "non-financial conflict of interest."

<sup>12</sup>NSF officials told us that, in addition to a conflict of interest policy, their Proposal and Award Policies and Procedures Guide outlines specific disclosure requirements.



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their professional appointments, current and pending support (financial or in-kind support), and external collaborations.

The agencies with conflict of interest policies (NIH, NSF, and NASA) vary in what they require from universities and researchers. For example, NIH and NSF specify which financial interests should be reported to the university, and require universities to mitigate any conflicts, whereas NASA's policy states that all conflicts must be disclosed.<sup>13</sup> NASA officials have noted that this applies to grantees and includes financial interests. Similarly, university administrators provided examples of inconsistent agency requirements. For instance, administrators at one university noted that agency program officers have, at times, provided inconsistent interpretations of agency disclosure requirements when providing guidance to different researchers.

Our report found that none of the three agencies' conflict of interest policies (NSF, NIH, and NASA) specifically mention foreign financial interests—including whether such interests should be reported. NSF and NIH officials noted that their policies were established in the mid-1990s, when the threat of foreign influence in research was not an issue. However, NSF and NIH officials also explained that they require researchers to disclose all financial interests, which, in their view, implies both domestic and foreign interests.

We found that existing agency-wide conflict of interest policies for NSF, NIH, and NASA focus on financial conflicts of interest and do not define

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<sup>13</sup>OSTP officials told us that there is no government-wide requirement for agencies to have conflict of interest policies that include requirements similar to those in the NIH and NSF policies. Officials from NASA referenced 2 C.F.R. part 200 as the basis for developing their conflict of interest policies for federal awards, and officials from NSF noted that the agency helped develop guidance found at 2 C.F.R. part 200 and that their policy, which existed prior to this guidance, is in compliance with the guidance. Issued by the Office of Management and Budget, 2 C.F.R. part 200 is uniform administrative guidance for grant awarding agencies, commonly referred to as the Uniform Guidance. This guidance includes a requirement that federal awarding agencies establish conflict of interest policies for federal awards. 2 C.F.R. § 200.112. The Uniform Guidance does not define "conflict of interest," but it does discuss the nonfederal entity's procurement procedures for procurements made in support of the federal award, and addresses the nonfederal entity's requirement to maintain "written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts." 2 C.F.R. § 200.318.

non-financial conflicts, and most do not discuss such conflicts.<sup>14</sup> Such conflicts may include foreign academic appointments and in-kind support—for example, in the form of laboratory space or materials—which can be provided by foreign entities. Our report found that government-wide guidance governing the grants process does not specifically mention or define non-financial conflicts, nor does it mention disclosing foreign affiliations, associations or activities.<sup>15</sup> However, the NSPM-33 issued subsequent to our report on January 14, 2021, requires, among other things, that the heads of research funding agencies establish policies requiring the disclosure of specific information related to potential financial and non-financial conflicts of interest from grant recipients.<sup>16</sup>

According to OSTP officials, it is important for agencies to define non-financial conflicts and address the issue in their policies in order to identify and mitigate undue foreign influence. Our December 2020 report recommended that all five agencies implement or update conflict of interest policies to include a definition on non-financial conflicts, such as the one developed by OSTP, and address these conflicts, both foreign and domestic. Four agencies concurred with our recommendations, and NSF neither agreed nor disagreed. As of September 2021, all agencies have taken steps to provide researchers with information on non-financial conflicts, but have yet to update their policies. Taking this action will better position the agencies to receive complete and accurate information from researchers on potential non-financial conflicts that could lead to foreign influence.

At the time of our report, agencies said that they were waiting for OSTP to issue its pending guidance on harmonizing disclosure requirements and developing best practices before updating their policies. In our report, we recommended that OSTP issue its pending guidance and expedite any additional guidance so that agencies can have the information needed to update their policies and fully address the threats of foreign influence.

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<sup>14</sup>While NIH's conflict of interest policies do not explicitly define non-financial conflicts, its Grants Policy Statement indicates that before an award is made, NIH staff will review disclosures of current and pending support, which the agency terms "other support," to determine whether there is "scientific, budgetary or commitment overlap."

<sup>15</sup>2 C.F.R. part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, does not include these requirements.

<sup>16</sup>NSPM-33 requires that these policies be established within 12 months of the date of issuance and consistent with applicable law. Agency policies will require disclosures from participants in the federally funded research and development enterprise, not just from grant recipients.

OSTP concurred with our recommendation. In January 2021 the President signed NSPM-33, which directs agency actions to strengthen protections of U.S. government supported research and development against foreign government interference and exploitation. NSPM-33 incorporated recommendations developed by the JCORE Subcommittee on Research Security. OSTP is currently working on developing implementation guidance for NSPM-33, due to be issued in November 2021.

Our report also found that regardless of whether agencies have conflict of interest policies, all require researchers applying for grants to disclose information as part of the grant proposal process.<sup>17</sup> Such disclosures could be used to determine if certain conflicts exist. All agencies noted that they primarily use disclosures to determine the capacity of the researcher to perform the proposed research, identify redundant funding of the same research, or both. Additionally, officials from NSF and DOD said that they do not use this information to assess the risks of foreign influence, while NIH and DOE officials told us they do. NASA officials explained that, while they generally do not use this information to assess the risk of foreign influence, they use the information reported on foreign partnerships or activities outside the United States to ensure compliance with a law that prohibits the agency from bilateral participation, collaboration or coordination with China or Chinese-owned companies.<sup>18</sup>

In addition, our report found that all 11 of the universities in our sample have publicly available financial and non-financial conflict of interest policies for federally funded research. Their financial policies often align with the financial conflict of interest policies or requirements of the

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<sup>17</sup>While some agencies we reviewed have agency-wide policies that discuss these requirements, other agencies require this information as part of the grant application process and provided sample grant announcements including these requirements.

<sup>18</sup>Department of Defense and Full-Year Continuing Appropriations Act of 2011, Pub. L. No. 112-10, § 1340(a), 125 Stat. 38, 123; Consolidated and Further Continuing Appropriations Act, 2012, Pub. L. No. 112-55, § 539, 125 Stat. 552, 639. This language has been included in subsequent appropriations acts, including that for fiscal year 2021. Consolidated Appropriation Act, 2021, Pub. L. No. 116-260, div. B, tit.V § 526, 134 Stat. 1182, 1281. In addition, NASA's grants and cooperative agreement manual requires the following assurance and representation related to this provision as part of the grant proposal: "By submission of its proposal, the proposer represents that the proposer is not China or a Chinese-owned company, and that the proposer will not participate, collaborate, or coordinate bilaterally with China or any Chinese-owned company, at the prime recipient level or at any subrecipient level, whether the bilateral involvement is funded or performed under a no- exchange of funds arrangement." NASA Grants and Cooperative Agreements Manual, at 81(2020).

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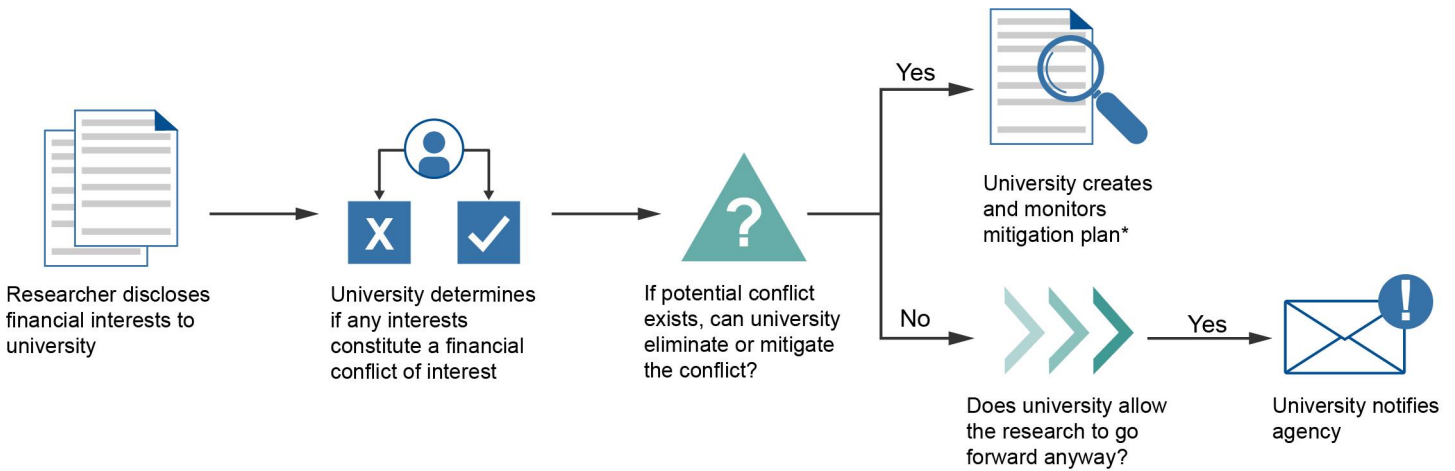
different granting agencies. In our report, university administrators told us that non-financial policies were instituted because of concerns that researchers may overcommit their time to working outside the university or encounter ownership issues when it came to the results of their research.

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## Agencies Rely on Universities to Monitor Conflicts but Some Agencies Lack Clear Enforcement Procedures

All agencies we reviewed stated that they rely on universities to identify and monitor financial conflicts of interest. Some agency officials explained that they make grants to universities, not to individual researchers, so universities bear the primary responsibility for addressing researchers' financial conflicts of interest. Of the agencies we reviewed, we found NSF and NIH have written policies that require universities to have a conflict of interest policy, determine whether a financial interest constitutes a conflict, and develop mitigation plans if the university determines that a conflict exists. In addition, NASA and DOD officials said they rely on the certification of the university that it "will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest or personal gain." DOD and DOE officials further stated that they have left the determination of financial conflicts to the universities. Figure 1 illustrates the general process for how universities manage financial conflicts of interest.

**Figure 1: Generalized University Processes for Identifying and Mitigating Potential Financial Conflicts of Interest**



Source: GAO analysis of university and agency policies. | GAO-22-105434

**Text of Figure 1: Generalized University Processes for Identifying and Mitigating Potential Financial Conflicts of Interest**

1. Investigator discloses financial interests to university
2. University determines if any interests constitutes a financial conflict of interest
3. Can university eliminate or mitigate the conflict?
  - a. Yes: University creates and monitors plan\*
  - b. No: Does university allow the research to go forward anyway?
    - i. Yes: University notifies agency

Source: GAO analysis of university and agency policies. | GAO-22-105434

\*NIH regulations require universities to submit financial conflict of interest reports, including a description of the key elements of the university's mitigation plans. 42 C.F.R. § 50.605(b)(1)-(3). In addition, DOE officials told us that some of their components also require universities to submit mitigation plans. DOD noted that they may require such information in certain circumstances.

However, NSF, NIH, and components of DOD and DOE do collect information on non-financial interests through Research Performance Progress Reports that could be used to determine potential conflicts, such as foreign collaboration with researchers or outside organizations involved in the project. Agencies we reviewed periodically collect information on funded projects through these progress reports, which provide details on the progress of and updates to the funded project, according to our review of agency documents and interviews with agency officials.

In interviews, agency officials told us they use the information in the progress reports for varying purposes. For example, NSF officials told us they use the information to determine the extent of international collaborations in agency-sponsored research. On the other hand, NIH officials told us that they use this information to detect potential foreign influence by identifying discrepancies between the reported information in the progress report and other sources, such as publications.<sup>19</sup>

In our December 2020 report, we also found that two of the five agencies reviewed—NSF and NIH—have written procedures for managing allegations of failure to disclose required information, such as foreign affiliations. Their documents outline the investigative process, establish roles and responsibilities, and allow for the nuances of each case. In contrast, the remaining agencies—NASA, DOD, and DOE—lacked clear written processes or procedures for managing allegations of failure to disclose required information, which can identify potential conflicts of interest. All three agencies concurred with our recommendation to document enforcement procedures and, as of September 2021, agencies noted that they were working on updating their policies and procedures, including documenting roles and responsibilities.

According to agency documents and interviews, all agencies we reviewed have multiple instances of conflict of interest cases involving foreign influence. Agency officials explained that they can learn about allegations of failure to disclose required information through universities, tip lines, other agencies (including the Federal Bureau of Investigation), or internal program offices. According to officials and agency documents, agencies can take a range of administrative or enforcement actions when an allegation of failure to disclose required information has been substantiated. These actions include asking the researcher's university to open an investigation, suspending the grant, or referring the case for prosecution.

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<sup>19</sup>According to DOE officials, one component of DOE, the Advanced Research Projects Agency-Energy, may elevate concerns related to "foreign misappropriation of research results" that they identify through these reports. DOD officials told us that they do not have the policies and procedures to use the progress reports in this way.

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## Stakeholders Identified Opportunities to Improve Responses to Foreign Influence in Federally Funded Research

As we reported in December 2020, agency officials, university association representatives, university administrators, and principal investigators noted several opportunities to improve agency responses to foreign influence in federally funded research.<sup>20</sup> Agencies have begun to take steps to address the issue of foreign influence, and this topic was addressed in the NSPM-33 and complementary OSTP guidance earlier this year. Many of the stakeholder responses reflected five common themes, detailed below.

**Harmonize grant proposal requirements.** All stakeholders noted the benefit and importance of harmonizing grant requirements to ensure clear understanding across all parties involved in addressing the risks of foreign influence. NSF and NIH have already collaborated with the Federal Demonstration Partnership in 2019 to develop SciENCv (Science Experts Network Curriculum Vitae), a tool that lets researchers prepare biographical information for grant proposals to either agency. Representatives from university organizations and university administrators noted they support the idea of uniformity and the shared standard format, so all users are using the same form to disclose outside support and other affiliations.

**Better communicate identified risks.** In interviews, university associations, university administrators, and principal investigators said agencies should better communicate the specific risks of foreign influence they have identified to universities. University administrators told us they would like more guidance on steps agencies recommend to identify, analyze, and mitigate threats of foreign influence. University administrators also noted timely information on specific threats of foreign influence from law enforcement and intelligence agencies would also be helpful.

NSF, NIH, and OSTP have issued documents and reports addressing the risks of foreign influences and provided resources for the research

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<sup>20</sup>According to NIH, a principal investigator is the researcher on a grant identified as having the appropriate level of authority and responsibility to direct the project or program supported by the grant.

community to better understand these risks. Most agencies in our report also conducted outreach to universities on the risk of foreign influence.

**Provide training on foreign risks.** Representatives of university associations suggested that agencies provide training to principal investigators on foreign influence in federally funded research. They said such training could improve universities' ability to identify and mitigate potential risks associated with their researchers. NSF held a webinar in April 2020 for researchers on meeting grant proposal requirements, which provided some training on reporting foreign influence.

**Disclose participation in foreign talent recruitment programs.** Stakeholders expressed a wide range of views on whether researchers should be allowed to participate in foreign talent recruitment programs. In addition, principal investigators in six of eight universities we interviewed did not know what these talent recruitment programs were or how to identify them. NSF and other agencies have worked closely with OSTP to increase understanding of these programs in the research community and the importance of disclosing participation to funding agencies.

**Reduce burden on universities.** Agency officials, university association representatives, and university administrators also noted that harmonizing and standardizing agency requirements for disclosing financial and non-financial interests could help reduce the burden on universities associated with ensuring researchers meet requirements for grants from multiple agencies. OSTP, through the NSPM-33, established a consistent set of disclosures research-funding agencies must require as part of their conflict of interest policies to increase harmonization and reduce burden on universities.

In conclusion, if agencies take steps to fully implement our recommendations to further clarify their conflicts of interest policies and written procedures to address alleged violations, they could improve their own ability as well as enhance universities' capacity to identify and mitigate conflicts and ensure consistency in enforcement. Implementing our recommendations, in conjunction with the guidance in NSPM-33, could better enable the research enterprise as a whole to address the growing concern of foreign influence in federally funded research.

Chairman Foster, Chairwoman Stevens, Ranking Members Obernolte and Waltz, and Members of the Subcommittees, this completes my prepared statement. I would be pleased to respond to any questions that you may have at this time.



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## GAO Contact and Staff Acknowledgments

If you or your staff have any questions about this testimony, please contact Candice N. Wright, Director, Science, Technology Assessment, and Analytics at (202) 512-6888 or [WrightC@gao.gov](mailto:WrightC@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement.

In addition to the contact named above, Farahnaaz Khakoo-Mausel (Assistant Director), Caitlin Dardenne (Analyst-in-Charge), Anika McMillon, and Ben Shouse made key contributions to this testimony. Other staff who made contributions to the report are identified in the source product.

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## Public Affairs

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