

GAO@100 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.

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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](#)

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.