

PRINCETON UNIVERSITY
Office of the Dean of the Faculty
Office of the Dean for Research

To: Members of the Faculty

From: Sanjeev R. Kulkarni, Dean of the Faculty; Pablo G. Debenedetti, Dean for Research

Subject: Compliance with Disclosure Requirements

Date: February 10, 2020

Dear Colleagues,

We write to remind you of the essential importance of compliance with disclosure requirements, in light of the recent arrest of a prominent scientist at Harvard University. The scientist is [alleged](#) to have made knowing false statements to Harvard and to government investigators about his affiliation and financial relationship with a Chinese university and the Chinese government, including his participation in the Thousand Talents Program. Over the past year, similar cases involving faculty at other research institutions have made headlines. These cases illustrate the importance of rigorous compliance with internal and governmental disclosure requirements. While the scope of those requirements is still not uniform across agencies, some federal funding agencies (such as [NSF](#) and [NIH](#)) have taken significant steps to clarify their expectations regarding researchers' obligation to disclose foreign (as well as domestic) appointments, affiliations, sources of income, research funding, and other support.

In light of these developments, we write with some important reminders. To be clear, Princeton strongly supports and encourages international collaborations and scholarly exchanges. However, we urge you to err on the side of transparency, completeness and precision when completing your conflict of interest disclosures and grant and contract proposal forms. Incomplete or incorrect disclosures, even if inadvertent, create significant risk for both the University and the affected faculty member. To reduce this risk, *when preparing proposals* please bear in mind that:

- Departmental grant managers and the Office of Research and Project Administration (ORPA) rely on principal investigators, who are most familiar with their own external activities and funding sources, to review and approve all proposal documents prior to submission, and PIs are required to certify the correctness of all the information in a proposal. Please ensure the documents are accurate and complete.
- Biosketches and CVs accompanying proposals must be up-to-date and list your academic and professional appointments, activities and relationships, including those with foreign institutions and funding agencies. This includes participation in foreign talent programs of any country.
- "Current and Pending" and/or "Other Support" documents must also be up-to-date and list all financial and in-kind resources in support of your research. This includes financial and in-kind resources for your research efforts available through organizations outside of Princeton.
- The University is not responsible for external support (*e.g.*, research funding that is not administered by Princeton, such as funding administered by another university or provided directly to a PI), so it is incumbent on you to include all such research funding in your grant applications. All external support for your research efforts (including foreign support obtained

through another university, academy, or foreign talent program) should be disclosed in the “Current & Pending” and/or “Other Support” parts of proposals. Please disclose both monetary support and non-monetary or in-kind support (office/laboratory space, equipment, supplies, and the like).

- Specific proposal disclosure requirements may vary from agency to agency. Carefully review solicitation and agency requirements and contact ORPA with questions or concerns.

Also, because our annual *conflict of interest disclosure* process is ongoing, please do remember to disclose (see Annual Disclosure form for a more thorough list):

- Appointments, managerial positions, and leadership roles at other entities, including foreign universities, governments and academies.
- Consulting and other outside work or activities, including consulting for foreign companies, universities, governments and academies. A few common examples of outside activities include consulting, teaching courses or conducting research for outside organizations, or participating in entrepreneurial ventures (*e.g.*, startup companies).
- Significant financial interests received from any external entity, including foreign companies, governments, universities and academies. The full definition of “significant financial interest” is provided in the Annual Disclosure form, and requires disclosure of remuneration greater than \$5,000 in a 12-month period.

Should you have any questions regarding the preparation of grant proposals, please contact your [Grant and Contract Administrator in the Office of Research and Project Administration](#). Questions regarding the preparation of your conflict of interest disclosure forms should be directed to Robert Scalese, Senior Compliance Administrator, Office of Research Integrity and Assurance (8-3105; scalese@princeton.edu). Of course, should you have questions or concerns, please feel free to contact one of us — we will be happy to help.

Sincerely,

Sanj and Pablo
Sanjeev R. Kulkarni
William R. Kenan, Jr. Professor of Electrical Engineering
Dean of the Faculty

Pablo G. Debenedetti
Class of 1950 Professor in Engineering and Applied Science
Professor of Chemical and Biological Engineering
Dean for Research

P.S. For your reference, below are links to additional resources, including some of our prior statements on disclosure obligations concerning foreign affiliations and funding.

[Guiding Principles](#) for Ensuring Research Security from Inappropriate Foreign Influence

[Disclosing](#) all Sources of Support in Grant Applications for the Princeton Research Community

[Inappropriate Foreign Influence](#)

[Recent NIH and NSF](#) Communications on Science and Security, Disclosures and Conflicts of Interest

[Export Controls Policy](#)