

# PRINCETON UNIVERSITY

## *Office of the Dean of the Faculty*

## *Office of the Dean for Research*

**To:** Assistant, Associate and Full Professors in Divisions III and IV  
**From:** Sanjeev R. Kulkarni, Dean of the Faculty  
Pablo G. Debenedetti, Dean for Research  
**Subject:** Mandatory Training on Inappropriate Foreign Influence  
**Date:** January 14, 2021

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Dear colleagues,

As we have communicated to you in [email messages](#) and in department faculty meetings, federal research sponsors are increasingly requiring and enforcing disclosure and transparency standards regarding researchers' activities outside the University. These requirements, which can relate to potential conflicts of interest, conflicts of commitment, technical and budgetary overlap, and protection of intellectual property, have largely been driven by bipartisan concern within the Federal Government over the last few years regarding [inappropriate foreign influence](#) on the R&D enterprise in the U.S. That concern has resulted in numerous federal investigations of researchers and their institutions, including some that led to the criminal prosecution of academics affiliated with research institutions across the country in the last year. Even when the government concludes that failures to disclose affiliations, activities, compensation or funding do not merit criminal prosecution, federal funding agencies can mandate the removal of researchers from ongoing projects, bar researchers from applying for grants in the future, and require institutions to return funds.\*

With this in mind, **we write to inform you that training on inappropriate foreign influence, with particular emphasis on disclosure requirements relating to researchers' outside interests and activities, is now required for all tenured and tenure-track faculty in Divisions III and IV (Natural Sciences, Engineering).** This training is intended to enhance researchers' readiness to act in principal investigator and key/senior personnel roles on federally-funded projects and to reduce the risks to you individually and to the University arising from even unintentional failures to disclose required information to federal sponsors. As

you may be aware, similar training was required of all research administration staff at the University in the fall of 2020.

Our offices, in collaboration with the Office of the General Counsel (OGC), have arranged one-hour training sessions via ZOOM for researchers later this month (see dates, times, and registration link below.) The presenters will include external experts with significant relevant experience gained while they worked for the U.S. Department of Justice and the NIH Office of Inspector General. We have scheduled several sessions during the last ten days of January so that you can **register for the one-hour slot that best fits your schedule** before classes start. Our goal is to make it possible for you to receive the training before you complete the 2021 annual conflict of interest (COI) disclosure process, which will begin on February 1. We believe that training prior to making your annual disclosure will make the process easier for you and reduce the need for follow up.

The dates and times for the training sessions are:

**Wednesday, January 20, 10am-11am**

**Thursday, January 21, 2pm-3pm**

**Friday, January 22, 3pm-4pm**

**Thursday, January 28, 10am-11am**

**Thursday, January 28, 3pm-4pm**

**Friday, January 29, 2pm-3pm**

**Please use the following link to register for one of the sessions:**

<https://putrain.learn.com/learncenter.asp?id=178409&page=310>

If you are **unable** to attend any of the one-hour sessions listed above, please write to [ogc-fi-training@princeton.edu](mailto:ogc-fi-training@princeton.edu) in the Office of the General Counsel. If necessary, we will arrange make-up sessions in early February. (We will work to make online training available in the future, but are going forward with “live” ZOOM training now in order to ensure that faculty and researchers are reminded of the applicable rules in advance of this year’s COI process.)

Even as the University recognizes federal sponsors’ focus on enforcement, Princeton’s commitment to openness and inclusivity, and its desire to attract exceptional talent from around the world, remains unchanged. Also unchanged is our support of researchers’ outside activities—domestic and foreign—that are

consistent with University policies and that benefit researchers and the University.

Thank you very much for your attention to this important matter, and we hope you are off to a safe and productive new year.

Best wishes,

Sanj and Pablo

\* See, e.g., <https://www.nature.com/articles/d41586-020-02051-8>  
<https://www.asbmb.org/asbmb-today/policy/062620/nih-continues-to-investigate-scientists-with-undis>