



## The Office of Industry Engagement & Conflicts of Interest

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### ***Foreign Collaborations Policy***

As part of our institutional commitment to global innovation, Mount Sinai's faculty and staff routinely engage with foreign entities both for research and for business purposes. These engagements require disclosure. Mount Sinai has included specific *foreign influence* questions in the required [COI Disclosure Profile in eDMS](#) in order to capture detailed information about activities with foreign entities. Foreign entities include commercial businesses, charities, universities, and/or governments. Relationships include but are not limited to academic appointments, visiting professorships, direct payments (employment, honoraria, gifts, awards, prizes, educational stipends, contributions, grants, hospitality, or travel reimbursement) as well as in-kind contributions (office space, equipment, personnel including post-docs/visiting students). Step-by-step instructions about how to complete the foreign influence section in eDMS can be found at the [Office of Industry Engagement and Conflicts of Interest website](#).

It is imperative that our research community be transparent concerning any support from and/or affiliations they may have with foreign entities. Such transparency ensures fairness in funding decisions and protects government investments in biomedical research. NIH and other Federal agencies require investigators to disclose foreign activities in **Biosketches**, **Other Support**, and **Foreign Components** documents. Although the documentation and submission requirements may differ by Federal funding agency, generally at the time of application, investigators must disclose in their **Biosketch** all foreign organizational affiliations as well as all academic, professional, or institutional appointments; these disclosures must be made whether or not remuneration is received, and, whether full-time, part-time, or voluntary. **Other Support** information is submitted to the Federal awarding agency prior to award, and includes disclosure of all positions and scientific appointments, both domestic and foreign, *all* resources, financial and non-financial (e.g., unique materials, access to and/or use of foreign laboratory facilities and/or lab personnel), made available to a researcher in support of and/or related to *all* of their research endeavors. A **Foreign Component** is the performance of any significant element or segment of the project outside the United States, either by the grantee or by a researcher employed by a foreign institution, whether or not grant funds are expended. Foreign Components must be disclosed at the time of application or during the awarded project period; any new foreign components added during the project period require *prior* approval from the Federal awarding agency. Additional information and resources are available on the [Grants and Contracts Office \(GCO\) website](#) under Biosketch and Other Support Info, including a detailed [Guide to Navigating Through NIH Policy and Procedure](#).

Although international scientific collaborations are an important part of Mount Sinai's academic mission, Mount Sinai investigators must be vigilant for situations that compromise research security and lead to inadvertent sharing of Mount Sinai confidential information including proprietary intellectual property. Participation in foreign government talent programs are problematic and participation in **malign foreign talent recruitment programs (MFTRP)** are prohibited by US law.

As per Section 10638(4) of the CHIPS and Science Act of 2022 (Public Law 117-167), Mount Sinai must disclose to the government any involvement in **Malign Foreign Talent Recruitment Programs**.

**Malign Foreign Talent Recruitment Programs (MFTRP)** have a specific definition and are defined as any type of program, position or activity that involves one of more of the following:

- (i) Unauthorized transfer of intellectual property, materials, data or other nonpublic information;
- (ii) Recruitment of trainees or researchers to enroll in such program, position or activity;
- (iii) Establishing a laboratory or entity in a foreign country in violation of terms and conditions of a federal research award;
- (iv) Accepting a faculty position, or undertaking any other employment or appointment in violation of the standard terms and conditions of a federal research award;
- (v) Being unable to terminate the activity except in extraordinary circumstances;
- (vi) Being limited in capacity to carry out a federal research award;
- (vii) Requirement to engage in work that overlaps or duplicates a federal research award;
- (viii) Requirement to obtain research funding from the foreign government's entities;
- (ix) Requirement to omit acknowledgement of the U.S. home institution and/or the federal funding agency;
- (x) Requirement to not disclose participation in the program, position, or activity; OR
- (xi) Having a conflict of interest or commitment contrary to a federal research award.

AND

Is sponsored by one of the following: (i) A foreign country of concern; or (ii) An entity based in a foreign country of concern; or (iii) An institution or program on certain prohibited government

In addition to concerns about **MFTRP** participation, legislation requires that by January 2027, in order to receive and maintain federal science and engineering support, Mount Sinai must have a research security program in place and investigators must complete mandatory trainings. Investigators will need to complete mandatory certified training in foreign travel, research security, cybersecurity and export control.