

# STAR Program

- STAR Certificate consists of 11 courses. To obtain a certificate, you must complete all 11 courses within two (2) years.
- During this pandemic, the two-year period has been extended. Please reach out to [training@research.ucsb.edu](mailto:training@research.ucsb.edu) for any exceptions
- For any STAR Program questions contact Hilda Vasquez and/or Clarissa Cabrera at [training@research.ucsb.edu](mailto:training@research.ucsb.edu)
- Zoom Classes will not be recorded for this 2022 series.
- Reminder to complete the STAR Evaluation. Emailed to registered participants via email used in UCLC.

# Research Integrity

Barry Rowan – Director, Research Integrity

Brian McCurdy – Export Control Officer

Monica Woltmon – COI Administrator

# Webinar logistics

**Questions:** There will be time at the end of our presentation for questions. Please use the Chat function to submit questions during the webinar. We will answer as many questions as time allows at the end of the session. Do not use the “Raise Hand” feature.



**RESEARCH INTEGRITY & FOREIGN  
INFLUENCE**  
BARRY ROWAN



**EXPORT CONTROL**  
BRIAN MCCURDY



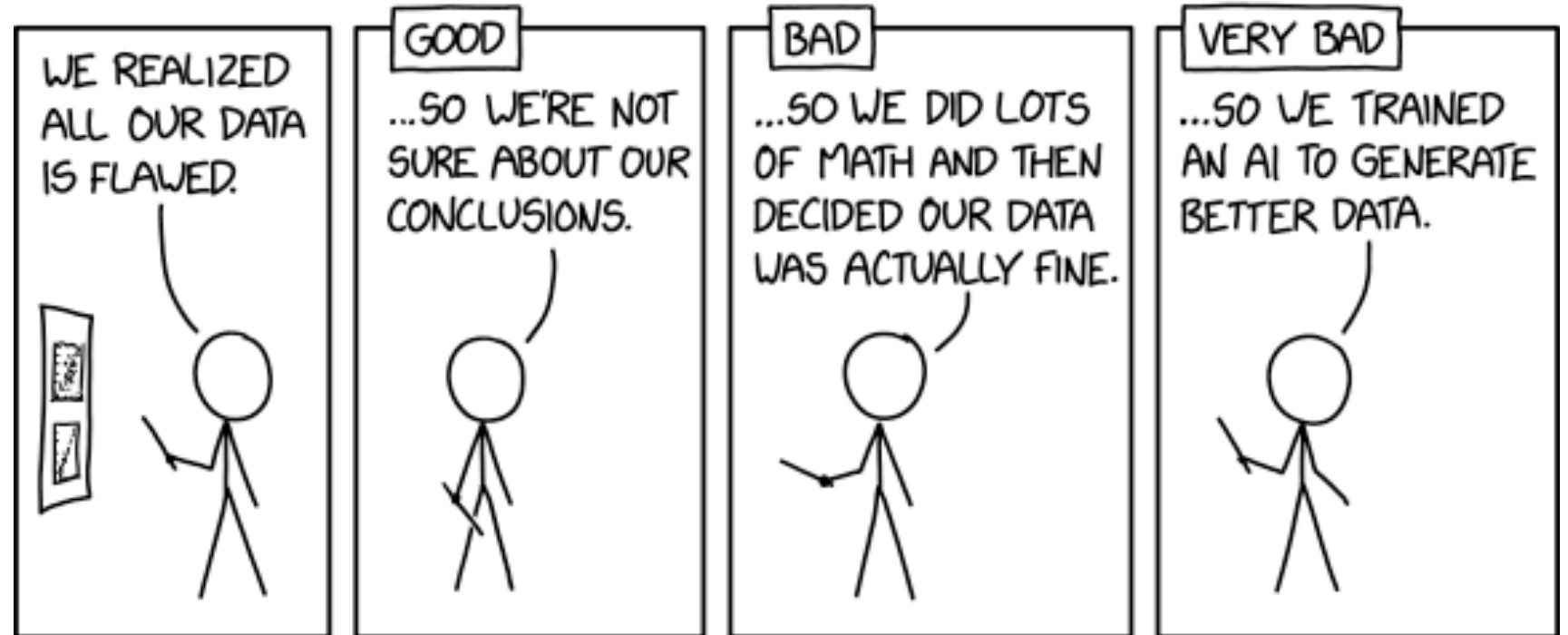
**CONFLICTS OF INTEREST**  
MONICA WOLTMON

Today's topics

# Research Integrity & Misconduct

Barry Rowan – Director, Office of Research Integrity

# Research Integrity



<https://xkcd.com/2494/>

# Why Talk About Research Misconduct?

Increased temptations and pressures in scientific research

Misconduct is underreported

Erodes public trust in science

Reproducibility crisis

Misuse of limited research funding

Impacts funding and employment opportunities of others

# What is Research Misconduct?

## Fabrication

- Making up data or results without conducting experiments

## Falsification

- Manipulating research methods, equipment or data to bias findings

## Plagiarism

- The appropriation of another person's ideas, processes, results, or words without acknowledgement, and passing them off as one's own



# Fabrication

Making up data or results without conducting experiments

Difficult to detect and often relies on whistleblowers

Can be detected by careful statistical analysis

Can overlap with plagiarism or falsification

ORI case summaries often show respondents found guilty of fabrication and/or falsification

## Fabrication Example

### Diederik Stapel

Professor of Social  
Psychology, Tilburg University

- Selfishness of carnivores and vegetarians
- 58 retractions, including PhD
- Published experiments that were never conducted
- Wouldn't share raw data
- Poor treatment of graduate students

## The Mind of a Con Man



The New York Times Magazine

UC SANTA BARBARA

# Falsification

Manipulating research methods, equipment or data to bias findings

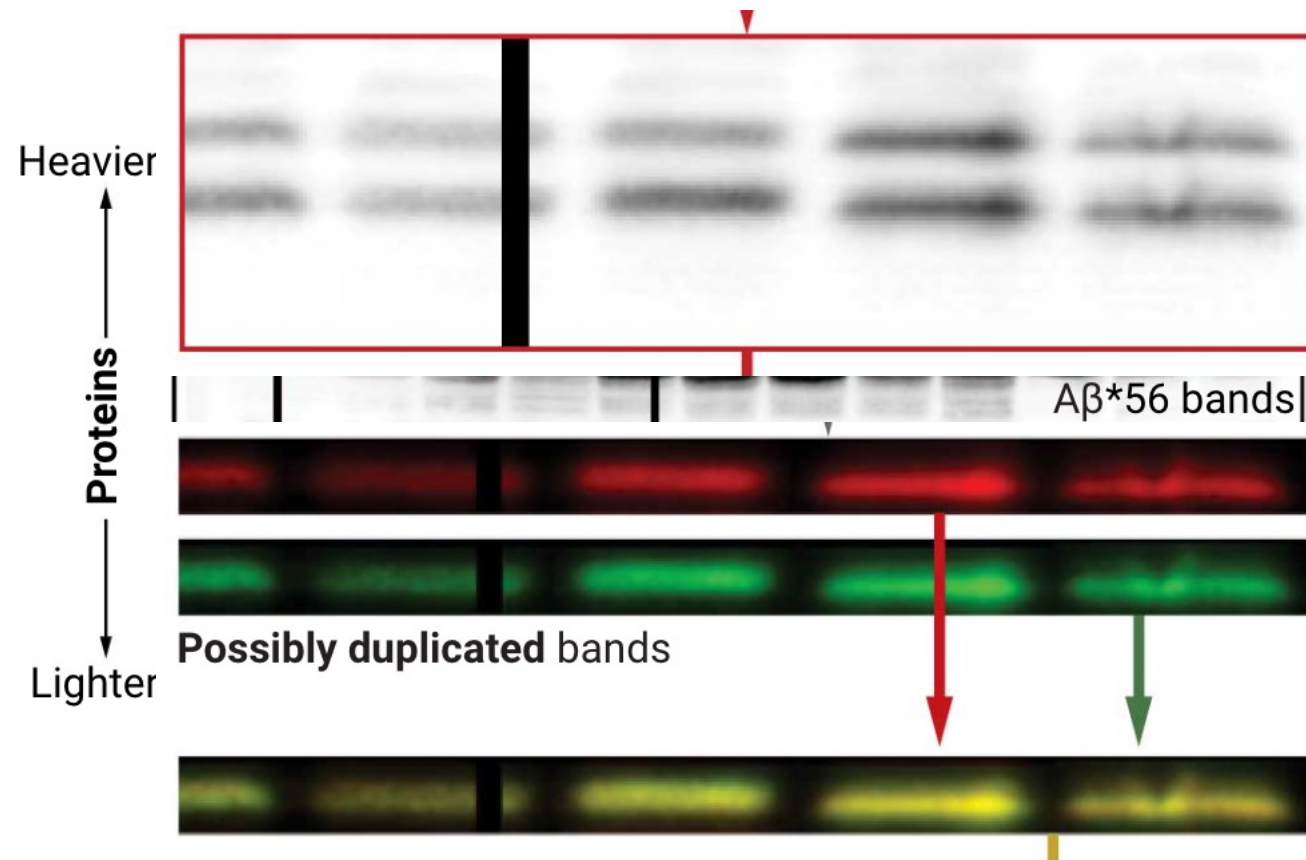
Changing a measurement or removing outliers

Manipulating images to alter the apparent results – cloning, erasing, etc.

Reusing the same result to represent a different experiment

Misrepresenting the experimental source of data

# Falsification Example



doi: 10.1126/science.adeo209

# Plagiarism

The appropriation of another person's ideas, processes, results, or words without acknowledgement, and passing them off as one's own.

## Large text similarities



<https://scienceintegritydigest.com/>

## Text recycling



# Foreign Influence

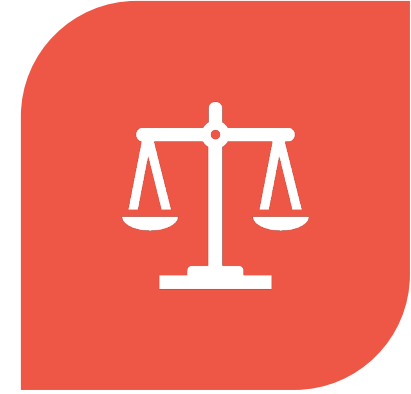
Barry Rowan – Director, Office of Research Integrity



ONGOING FEDERAL  
CONCERN



DISCLOSURE  
OBLIGATIONS



CONSEQUENCES CAN  
BE SIGNIFICANT

## Key Points

# Overview

## Foreign Influence

- **International collaboration and foreign contributions are critically important to UCSB**
- U.S. government has shared concerns about unreported foreign engagements since 2018
- New policies and requirements have been enacted to address these concerns
- Legislative measures being proposed to increase reporting or compliance requirement
- Outcome: Greater scrutiny of materials submitted to funding agencies



# Key areas of Federal concern

Foreign Influence

## Reporting research support and foreign affiliations

- Double-dipping: receiving federal funding for research being duplicated at a foreign institution
- Talent programs: contractual requirements that violate policies/laws such as giving IP ownership to foreign institution

## Securing intellectual property

- Reduce the risk of intellectual property diversion
- Preserve appropriate international collaborations

## Protecting the integrity of peer review

- Unauthorized sharing of confidential or pre-publication research data

# NIH requirements

Resources and/or financial support from all foreign and domestic entities.

Consulting agreements when the PI will be conducting research as part of those activities.

In-kind contributions, e.g., space, equipment, supplies, or students/staff supported by an outside source.

Supporting documentation for Other Support involving foreign appointments and/or employment with a foreign institution.

Immediate notification of undisclosed Other Support.

## NSF requirements

Resources that support the individual's research efforts, regardless of monetary value.

In-kind contributions that have an associated time commitment.

Notification within 30 days of discovering undisclosed current support.

# Malign Foreign Talent Recruitment Programs

Foreign Influence

## Special concern with these programs

- Many countries have legitimate recruit programs
- Talent programs allow full U.S. employment while working at a foreign institution
- Contract terms often differ from the participant's understanding
- Terms conflict with UC policies
- Termination of agreement may require foreign government approval

## Characteristics may include requirements to:

- Attribute awards, patent, and publications to the foreign institution, even if U.S. funded
- Include time obligations that create conflict of commitment
- Give preferential treatment to members of the foreign institution
- Replicate or transfer U.S.-funded work to the foreign institution

# What should researchers do?

Foreign Influence



Understand that it is better to err on the side of reporting than not



Follow existing COI and Outside Activity reporting requirements



Review funding agency expectations and UCSB guidance



Ensure your Biosketch lists all foreign appointments



Fully report “Other Support” in proposals and progress reports



Work with the Office of Research if a sponsor asks for information

# Export Control

Brian McCurdy – Export Control Officer

# Global Leader in the Sciences

Export Control



In its 2013 ranking of the world's top 500 universities, Leiden University ranked UC Santa Barbara number 2 for research impact in the sciences.



#1 public university for engineering research impact in 2016 Leiden Rankings.

## Export Controls

United States federal regulations that regulate the distribution of items, information, software and services to foreign nationals and foreign countries.



# U.S. Export Control Regulations

## ITAR (International Traffic in Arms Regulations)

- Department of State
- Military technologies; e.g. firearms, missiles, tanks and military vehicles but also includes spacecraft & satellite technology

## EAR (Export Administration Regulations)

- Department of Commerce
- Broader dual-use technologies; e.g. computers, marine technologies, sensors and lasers; and controls are very technology-specific

## OFAC (Office of Foreign Assets Control)

- Department of the Treasury
- Sanction programs are country specific and controls may cover any and all technologies and activities

# Campus Partners



# Impacted Activities

- International shipping
- Procurement
  - Purchasing controlled items (commodities, software, and technology)
  - Sending commodities back to international suppliers for repair
- Hosting foreign visitors (students and scholars)
- Agreements with industry partners (e.g. MTAs and NDAs)
- Contracts and grants
- Surplus sales
- Foreign travel
  - Iran, Cuba, North Korea, Syria, Crimean Region of the Ukraine

# How Does UCSB Comply?

Restricted party screening practices

Screening international shipments

Work with industry and government contacts to understand export control compliance obligations

Ensure an open research environment

- Freedom to publish research results
- No restrictions on research personnel

# ORBiT Datasheet

## Assurance #11 (A, B, C)

Does the proposed research involve any of the following: foreign sponsor, foreign collaboration, foreign sub-recipient(s), or international shipments of any commodities or technology (e.g. materials, software, etc.). Additionally, does the proposal involve travel to Cuba, Iran, Syria, Sudan, North Korea, Ukraine (Crimean Region) or research at any listed country by UCSB personnel? Please contact Research Integrity staff at [exportcontrol@research.ucsb.edu](mailto:exportcontrol@research.ucsb.edu) for any questions regarding this assurance.

- **11A.** Covers high risk countries under comprehensive sanctions (Cuba, Iran Syria, Sudan, North Korea, Ukrain (Crimean Region)
- **11B.** Covers shipments and transfers to foreign countries
- **11C.** Covers foreign sponsors, foreign collaborators, foreign subcontracts, and financial support to a foreign entity

## Examples

Purchase of an ITAR-controlled infra-red camera for a fundamental research project on campus

Research samples being sent to a foreign collaborator for specialized testing

Faculty member traveling to Iran for a conference

Remote work and learning requests



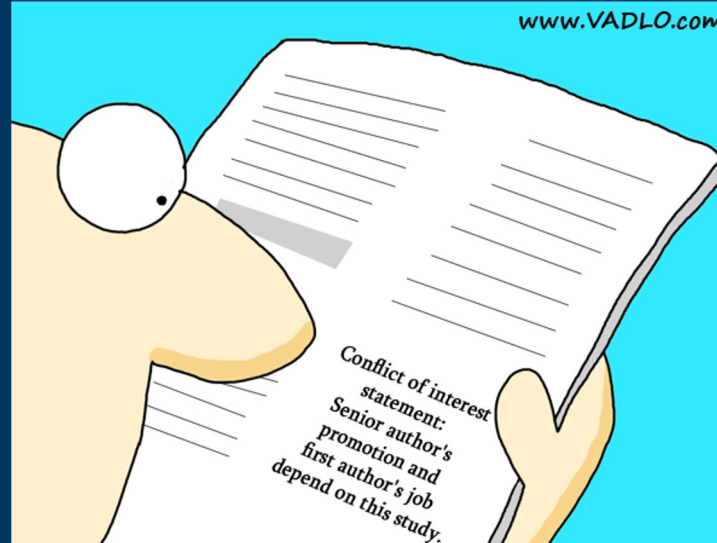
If you have **ANY** questions, please  
contact us at:



[exportcontrol@research.ucsb.edu](mailto:exportcontrol@research.ucsb.edu)

# Conflicts of Interest in Research

Monica Woltmon– COI Analyst





# Conflict of Interest (COI)

Definitions & Principles of COI

UCSB COI related policies

National Science Foundation

Public Health Service

Department of Energy

California state requirements for private funders

Conflict of Interest Committee review

Examples of COI

ORCOI

# Conflict of Interest - definitions

## Conflict of Interest

- ❖ Occurs when an individual's decisions, actions, plans or priorities could be affected by external influences or pressures.

## Business/ Procurement

- ❖ Occurs when an employee or officer may influence UC business decisions for the personal gain of the employee or his/her family or friends.

## Research conflict

- ❖ Occurs when a researcher's external interests have the potential to influence the research project, or the interpretation of research results.

# Why Conflicts of Interest Matter?

## Conflicts can be perceived or real

- ❑ It's important to identify all conflicts in research to avoid circumstances such as:
  - ❖ personal gain
  - ❖ compromise in design, conduct, or reporting
  - ❖ Distorted or inaccurate data
  - ❖ Withholding results
- ❑ It's important to maintain UCSB's integrity as well as that of the researcher

# Policies related to Conflict of Interest

- ❑ **Principles of Academic Freedom (APM-010)**
  - ❖ As a public university, UCSB has a responsibility to disseminate knowledge for public benefit. UCSB must retain the freedom to publish research results, assure that the teaching and research environment remains open and retain unfettered freedom to pursue research.
- ❑ **Outside Professional Activities (APM-025)**
  - ❖ Outside professional activities are limited to 39 days per academic year, which includes weekend days, but excludes summer months.
- ❑ **Conflict of Interest in Graduate Education (APM-028)**
  - ❖ Faculty cannot use University resources or facilities on a significant scale for personal, commercial, political, or religious purposes.

## Policy

- ❖ Investigators must disclose ***project-related*** outside financial interests at time of proposal, on an annual basis or within 30 days of acquiring a new outside financial interest that is above the threshold of 10k in the trailing 12 months.

## How?

- ❖ Datasheet assurance NSF “yes” populates COI queue
- ❖ Lead PI indicates to liaison all the Key Personnel responsible for Design, Purpose, Conduct & Reporting in project
- ❖ Liaison enters Key Personnel and checks complete
- ❖ All investigators on the project receive an email from ORCOI with a link to complete an NSF disclosure.
- ❖ Subrecipients who do not have their own COI policy must also complete an NSF disclosure in ORCOI

# Public Health Service

## Policy

- ❖ Investigators must disclose all outside financial interests related to their ***institutional responsibilities*** at time of proposal, on an annual basis or within 30 days of acquiring a new new outside financial interest that is above the threshold of 5k in the trailing 12 months. They also must disclosure all reimbursed travel related to their institutional responsibilities that when aggregated is more than \$5k in the trailing 12 months.

## How?

- ❖ Datasheet assurance PHS “yes” populates COI queue
- ❖ Lead PI indicates to liaison all the Key Personnel responsible for Design, Purpose, Conduct & Reporting in project
- ❖ Liaison enters Key Personnel and checks complete
- ❖ All investigators on the project receive an email from ORCOI with a link to complete a PHS disclosure. PI and all KP must also complete COI training in UCSB Learning Center
- ❖ Subrecipients who do not have their own COI policy must also submit a PHS disclosure and complete training

# DOE- Department of Energy

## Policy

- ❖ Investigators must disclose all outside financial interests related to their ***institutional responsibilities*** at time of proposal, on an annual basis or within 30 days of acquiring a new outside financial interest. They also must report all reimbursed travel regardless of amount as it relates to their institutional responsibilities.

## How?

- ❖ Lead PI indicates to liaison all the Key Personnel responsible for Design, Purpose, Conduct & Reporting in project
- ❖ Liaison enters Key Personnel and checks complete
- ❖ All investigators on the project receive an email from ORCOI with a link to complete a DOE disclosure. (No datasheet entry needed). PI and all KP complete COI training in UCSB Learning Center

# California State Requirements for Private Funders

## Policy

- ❖ UCSB PI's must submit 700-U disclosure at the time of award for all private contracts, grants or gifts.

## How?

- ❖ Datasheet assurance 700-U "yes" populates COI queue
- ❖ PI receives an email from ORCOI with a link to complete the 700U.



## Conflict of Interest Committee Review

- ❑ Meets monthly to review “positive” disclosures
- ❑ Sends recommendations to the VCR suggesting:
  - ❖ Best practices memo
  - ❖ Management conditions
  - ❖ Needs further review
  - ❖ Denial

# Examples of COI in research

## Consulting

### Outside consulting

- ❖ Concerns: bias in research
- ❖ Mitigation: transparency & disclosure

## Equity

### Holding equity in a company that is sponsoring research or has interest in outcome of research

- ❖ Concerns: bias in research, intellectual property rights
- ❖ Mitigation: non-conflicted co-PI or advisor, transparency & disclosure

## Startup

### Founding a company & subcontracting to UCSB

- ❖ Concerns: use of resources, bias in research, graduate student protection, intellectual property rights
- ❖ Mitigation: non-conflicted co-PI or potential removal from project

## Office of Research Conflict of Interest Disclosure System (ORCOI)

- ❖ ORCOI will auto send emails to investigators when a disclosure is due and will continue to send notices until disclosure is completed
- ❖ Once the disclosure is completed ORCOI will either auto approve or send to COI team for review.
- ❖ The COI office in conjunction with IT continue to improve ORCOI's capabilities making it more efficient



If you have **ANY** questions, please contact us at:



[coi@research.ucsb.edu](mailto:coi@research.ucsb.edu)

# Questions

