



Research Security and
Compliance

University of Missouri-Columbia

Standard Operating Procedure

RSC Coordination with the Conflicts of Interest Team

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Table of Contents

Purpose
Scope
Policy/Procedure

1.0 Purpose

To describe the procedures for coordination between Research Security and Compliance (RSC) and the Conflicts of Interest (COI) team to ensure that research security concerns are highlighted to university faculty and their supervisor ensuring that they make decisions about potential conflicts with all of the relevant facts.

2.0 Scope

The SOP applies UM/MU COI disclosures.

3.0 Policy/Procedure

In support of each other and to ensure that research security concerns are highlighted to faculty appropriately, RSC and the COI Team will work collaboratively to perform research security reviews for disclosures of engagement with international activities made through the COI Disclosure process.

COI Team responsibilities

1. Identify foreign parties disclosed via the COI Disclosure process.
 - a. If the foreign party is located in a Country of Concern, as defined in the CHIPS and Science Act of 2022 or is located in a comprehensively sanctioned jurisdiction (e.g., Cuba, China, Iran, North Korea, Russia, Syria, or the Crimea, Donetsk, or Luhansk regions of Ukraine), route the COI Disclosure to RSC for a research security review.
 - b. If the foreign party is not located in a Country of Concern, as defined in the CHIPS and Science Act of 2022 and is not located in a comprehensively sanctioned jurisdiction, ensure the following language is embedded withing the COI response

letter.

The activities described in your disclosure may meet the threshold for an ongoing collaboration, relationship, or other engagement that must be reported to a federal research sponsor. If you are or will be engaging in U.S. federally funded research, you must carefully review your federal sponsor's guidelines and requirements related to pre and post award disclosures, and, if required, disclose these research interests or activities to your federal sponsors.

Additional information is available at: <https://research.missouri.edu/sponsored-programs-administration/guidance-for-disclosing-all-financial-interests>

Please note: International activities may raise export control and sanctions compliance risks. As this is an outside activity, MU is not able to provide further specific guidance or compliance advice on these scenarios. Compliance concerns related to export control and sanctions should be addressed with your own attorney or consultant.

RSC Responsibilities

1. Review COI Disclosures, with input from the disclosing employee and COI team, to determine if there are any research security risks that need highlighted to the disclosing employee or MU.
2. Screen non-U.S. entities disclosed via COI against government lists of prohibited and risky parties.
3. Highlight if activities may be considered Malign Foreign Talent Recruitment Programs or could otherwise jeopardize federal funding.