



NSF 19-200

Dear Colleague Letter: Research Protection

July 11, 2019

Dear Colleagues,

I am writing about a sensitive and important challenge that affects our entire science and engineering community. As you know, the National Science Foundation (NSF) is dedicated to maintaining a vibrant and diverse research community that thrives on the values of openness, transparency, and merit-based competition. With the support of NSF, this community is a major contributor to U.S. economic growth, national security, and global leadership. To maintain our robust research ecosystem, it is important that we understand and vigilantly address emerging risks to the nation's science and engineering enterprise.

A great strength of the U.S. research and engineering enterprise is the diversity of talent—both domestic and international—and that is a strength we are committed to maintaining. International collaboration is essential to pursuing the frontiers of science, as dramatically demonstrated by the incredible imaging of a black hole event horizon, the ambitious MOSAIC project to study Arctic changes, and the detection of gravitational waves on Earth.

Our science and engineering enterprise, however, is put at risk when another government endeavors to benefit from the global research ecosystem without upholding the values of openness, transparency, and reciprocal collaboration. Faced with such a risk, we must respond.

Our values have not changed. What has changed is the scope and sophistication of the activities threatening our research community, such as certain foreign-government-sponsored talent recruitment programs. These activities create new risks to the integrity of NSF's mission and operation. NSF is therefore taking multiple steps to mitigate these risks in concert with other agencies and stakeholders, as outlined below.

To ensure that NSF is applying consistent standards to all staff members, each of whom has access to sensitive merit review and other information, we issued a requirement in April 2018 that rotators working onsite at NSF must be U.S. citizens or have applied for U.S. citizenship.

Earlier this year, we sent a note to NSF staff reminding everyone that government ethics regulations require accurate and timely financial disclosure reports and that Federal ethics rules, which apply to both our career and rotator personnel, cover emoluments issues and gifts from foreign governments.

Since 1978, NSF has required senior project personnel on proposals to disclose all sources of support, both foreign and domestic. A renewed effort is now underway to ensure that existing requirements to disclose current and pending support information are known, understood, and followed. For example, in May, we published in the Federal Register a proposed clarification of our proposal disclosure requirements (open for

public comment through July 29). Our draft NSF Proposal and Award Policies and Procedures Guide includes clarifications regarding reporting requirements for both current and pending support and professional appointments.

To streamline the process for providing these disclosures to NSF, we are proposing use of an electronic format for submission of biographical sketches, including disclosure of all appointments. As currently envisioned, this will become effective in January 2020. We are also working to develop an electronic format for disclosure of current and pending support information.

We want to ensure we have expert input into issues related to open science and security, so we have commissioned the independent scientific advisory group JASON to conduct a study. This study will assess risks and recommend possible practices for NSF and its awardee organizations to achieve the best balance between openness and security of science. They will complete their report by the end of the calendar year.

Finally, we are issuing a policy making it clear that NSF personnel and IPAs detailed to NSF cannot participate in foreign government talent recruitment programs. There is a risk that participation in foreign government talent recruitment programs by NSF personnel and IPAs will compromise the ethical principles that bind us. Moreover, such participation poses significant risks of inappropriate foreign influence on NSF policies, programs, and priorities, including the integrity of NSF's merit review process—risks we simply cannot accept.

We recognize this issue is difficult. We won't be able to make the changes needed to address this new challenge to our community without your input and support. We want to hear from you and look forward to working together to develop solutions, even if it means making changes to long-standing policies and practices. In the end, the steps we are taking and will take are aimed at protecting your vital research and continuing the kinds of international collaborations that are needed to promote the progress of science, to advance the national health, prosperity, and welfare, and to secure the national defense.

Thank you for your continued support of our mission and we look forward to hearing from you. If you have any questions, please send those to research-protection@nsf.gov (mailto:research-protection@nsf.gov).

Sincerely,

France Córdoba
Director

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