Policy on External International Engagements

I. Purpose and Scope

Northeastern University is committed to supporting its faculty’s external activities and collaborations in keeping with its core mission as a global, academic research institution that is dedicated to applying use-inspired research to areas of critical global need. The university is equally committed to sound stewardship of the private and governmental resources supporting its research and other endeavors, and to conducting its activities in keeping with the highest standards of excellence, transparency, and adherence to regulatory requirements.

This policy recognizes the potential for conflicts of interest or commitment, as well as national security and compliance concerns attendant to some international engagements, particularly in light of the inherent vulnerabilities of an open academic environment and growing national concerns about threats to U.S. intellectual property and the integrity of federally-funded research endeavors.

The policy applies to faculty members with primary commitments to the university and research staff responsible for the design or conduct or extramurally funded research.

II. Definitions

For purposes of this policy,

**External Engagement** means, regardless of title or remuneration, an obligation that requires a faculty member to make a commitment to, or perform work for, an unaffiliated, international entity whether for academic, research or other business purposes. For the purposes of clarity, this definition is inclusive of consulting arrangements (i.e. acting as a scientific
reviewer or on a scientific advisory board or as a business consultant). This term does NOT include the following external international engagements to lecture/present/visit/collaborate for a period of less than 14 days:

a) international travel to conferences, or
b) international travel related to approved visiting researcher/scholar appointments, or
c) sabbaticals.

**International** means any country, region or territory beyond the United States of America and its recognized territories.

**Primary commitment** means the faculty member has an appointment to Northeastern University as documented in an appointment letter and is subject to the Personnel Policies on Faculty Outside Professional Activities.

**Secondary commitment** means an honorary, visiting, adjunct, part-time or any other title or appointment at any international entities.

### III. Policy

The university requires all faculty with primary appointments at Northeastern to seek prior approval of any external international engagement at least thirty (30) days prior to the commencement of the planned engagement. This requirement recognizes that certain types of external international engagements can be potentially problematic, especially when such commitments include or require extensive leaves of absence, significant investment of university resources, the operation and oversight of a separate research lab, the promise to exchange data, the establishment of a joint venture / institute, the assignment of intellectual property, or a pledge to engage in the supervision and/or mentoring of non-Northeastern students and research fellows, among other obligations. Secondary or honorary appointments / engagements / positions at external international institutions must be disclosed to the university and also to any of its federal sponsors of research, in accordance with applicable sponsor policy.

To obtain approval, the faculty member must submit a copy of any contract or agreement defining the parameters of the international engagement, as well as the questionnaire available at NU-RES Research Compliance’s [International Engagements Compliance website](#). If no contract or agreement is available, the faculty member is
expected to provide sufficient detail to clarify the scope, duration and location of the international engagement in the intake form.

If the relevant contract or agreement is only available in a language other than English, the university will procure an accurate translation.

Notwithstanding the above, the faculty member is encouraged to consult the Chief Research Compliance Officer as a resource as early as possible as the engagement is being contemplated.

**Non-research Related:** If the pending external international engagement is purely academic (i.e., the faculty member does not have any active externally funded research projects and/or recent research proposals) or if the faculty member submitting the request is not engaged in research, Research Compliance will provide the information to the appropriate college dean or designee and the final approval will rest with the college.

**Research Related:** If the scope of the pending external international engagement includes research or the faculty member has active externally funded research projects and/or recent research proposals or seeking funding for research projects, then prior approval of both the college dean’s office and the Office of the Provost, are required to accept the engagement.

Additionally, investigators applying for research funds on behalf of the university are expected to verify the accuracy and validity of all administrative, fiscal, and programmatic information appearing in research funding proposals and reports, as mandated by funding agency regulations and university policy and guidance. Any external international engagement approved through this policy will likely require investigators to update their respective sponsored research documentation, including but not limited to, their CV/Biosketch, Other Research Support and/or Current and Pending Support documentation.

**Appeals:** In very limited circumstances, the external international engagement may pose a risk to the institution. In such circumstances, the college dean or the Office of the Provost may ask the faculty member to decline the engagement. Should the faculty member wish to appeal the decision, they may work with Research Compliance to submit an appeal to the Provost.
IV. Additional Information

The obligation set forth in this policy is distinct from and in addition to faculty and employee obligations described related policies, including but not limited to, Financial Conflicts of Interest in Research (FCOI) Policy and the Conflict of Interests and Commitment Policy (COIC). FCOI/COIC policies both require retrospective and on-going reporting of both international and domestic engagements.

Some engagements and agreements may have a negative impact on federal funding decisions for individual researchers. In addition, failure to disclose secondary or honorary appointments / engagements / positions at external international institutions to federal research sponsors can result in significant civil and criminal liability to individual researchers and their respective primary research institutions.

Additional guidance and information are available at NU-RES Research Compliance’s Research Security and Transparency website.

V. Contact Information

For research-related inquiries: Chief Research Compliance Officer (617) 373-2508 researchcompliance@northeastern.edu

For all other inquiries: Compliance Department (617) 373-5893