

INTERNATIONAL RESEARCH & GLOBAL COLLABORATION

Guidance for the University of Rochester Community

Developed by the Committee on Science and Security:

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Executive Summary

The U.S. Congress and federal agencies have expressed increasing concern regarding specific types of scientific and research (including educational) collaborations with foreign entities. The concerns focus on arrangements directly or indirectly involving foreign governments that may compromise U.S. national security and/or weaken U.S. competitiveness. Several new federal policies are being implemented or under consideration. The University administration is actively involved in helping to address these concerns and mitigate risks, while advancing global engagement activities and maintaining non-discrimination and openness in research.

This interim guidance is designed to aid all those who participate in or support collaboration with international entities, whether for research, scientific, educational or other purposes aligned with the mission of the University. The interim guidance provides a more integrated framework to address a range of considerations and outlines specific actions, from disclosing international collaborations and various forms of support, to hosting visitors and international travel. Specific procedures and points of contact are also provided, while additional guidance and resources will be forthcoming to address specific topics and provide further clarity as Federal policies continue to evolve. A brief checklist is also provided to assist with this process.

Checklist for International Collaborations & Research

- Know what constitutes an international collaboration, i.e. any engagement with labs, institutions, entities, or persons originating or conducted in whole or part outside the US.
- Disclose all international collaborations to the University using one of the following mechanisms (see details on page 5):
 - To your [research administrator](#) in the [Office of Research and Project Administration](#);
 - To the [Office for Global Engagement](#);
- Disclose all international collaborations to US funding agencies using the mechanisms recommended by the respective agencies (details on page 5).
- Familiarize yourself with ORPA's [Export Control Guidance](#).
- Host international visitors appropriately (details on page 8).
- [Register your international travel](#) with the Office for Global Engagement (strongly advised).
- Protect your and the University's data (details on page 9).
- Follow the University's intellectual property (IP) and conflict of interest (Col) policies.
- Ensure your publications are affiliated appropriately with the University of Rochester.
- Follow the University's policy on secondary and honorific appointments abroad.

Introduction & Context

Recently, the U.S. government (USG) acting through several Federal agencies and the U.S. Congress have expressed increasing concern regarding various types of scientific and research (including educational) collaborations with foreign entities, including undisclosed foreign financial conflicts, undisclosed affiliations with foreign institutions and companies, foreign talent recruitment programs, breaches of confidentiality during the peer review process, shadow labs, and intellectual property theft.¹²³⁴⁵⁶⁷⁸ The USG has raised particular concerns with arrangements directly or indirectly involving foreign governments, where the underlying intent may compromise U.S. national security and/or weaken global competitiveness.

The University takes these concerns seriously and is working collaboratively with the USG, our national associations, and our peers to review existing policies and advance best practices to ensure that security controls are appropriately applied and that an appropriate balance is maintained between the open dissemination of scientific knowledge and requirements that guard scientific information to protect national security and U.S. competitiveness. The U.S. academic research enterprise and the University of Rochester have long benefitted from a culture of openness in research and from being a magnet for global research talent and training. The University of Rochester remains deeply committed to international collaboration and global engagement. As we explore the frontiers of innovation and knowledge, we are happy to welcome the world's best and brightest to the Rochester community. We have done this since shortly after our founding in 1850, and we will continue to do so. It is our pleasure and honor to be the destination for students and scholars from 140 countries around the world. Faculty and students study and conduct research with partners at locations across the globe. Indeed, it is how we "learn, discover, heal, create, and make the world Ever Better".

The University upholds its [non-discrimination](#) and [openness in research](#) policies throughout its global engagement activities. The University is committed to maintaining a teaching and research environment that fosters open research and exchange of ideas, encourages the creation and dissemination of new knowledge and promotes academic freedom. This applies regardless of field of inquiry and regardless of the physical location. University faculty and students should be comfortable that global research collaborations and scholarly engagement are permissible as long as basic proactive steps are taken to ensure that these activities are consistent with university policies and relevant laws and regulations.

Nearly all forms of mutually beneficial international collaboration and global engagement are permitted and encouraged under University policies, as well as under relevant government laws and regulations. However, the failure by a researcher to comply with applicable laws, regulations or University policies could result in a loss of

¹ [China: The Risk to Academia](#), FBI Report

² [NIH presentation, Foreign Influences on Research Integrity](#), December 13, 2018

³ [Statement of the NSB on Security and Science](#), October 23, 2018

⁴ [Stealing Innovation](#), by Elizabeth Redden (Inside Higher Education)

⁵ [Science vs. Security](#), by Elizabeth Redden (Inside Higher Education)

⁶ [Letter to the United States Research Community](#), Kelvin Droegemeir, Director, OSTP, September 16, 2019:

⁷ [Letter to Research Community on Science and Security](#), DOD Under Secretary Michael D. Griffin, October 10, 2019

⁸ [Vast Dragnet Targets Theft of Biomedical Secrets for China](#), The New York Times, November 5, 2019

funding opportunities, personnel action, and even civil or or criminal liability for the researcher.⁹¹⁰¹¹¹² Accordingly, the University recommends all members of its community to take a series of steps to ensure that their international collaborations and activities are both transparent and in full compliance with relevant laws, regulations and University policies.

What follows is a guide for the University of Rochester community engaged in international collaborations and research within the current context.

Overview of Laws, Policies, & Procedures

All University research, scientific, and other forms of collaboration, whether conducted on campus or abroad, must be consistent with University policies and comply with applicable U.S. law as well as with local, in-country laws and regulations. Most relevant to the purposes of this document, these regulatory requirements include U.S. export control laws, promulgated by the [U.S. Department of State](#), the [U.S. Department of Commerce](#), and the [U.S. Department of the Treasury](#) as well as any applicable laws of the host country and jurisdictions.

- Specific information about each of these U.S. regulatory frameworks and the management of export compliance at the University is available through the [Office of Research and Project Administration](#) (ORPA). U.S. export control laws restrict, or require licensing for the export, even temporarily, of many items and technologies to countries around the world, and in some situations to foreign persons in the U.S. Releasing or otherwise transferring export controlled technology or source code to a foreign person in the United States is considered a “deemed export” to the person’s country or countries of nationality. University employees working internationally, particularly in or with sensitive countries (e.g., under U.S. Department of Treasury [Office of Foreign Assets Control sanctions](#)), should be familiar with these export control laws as described on the ORPA site and below.
- The [Office for Global Engagement](#) can assist with guidance and information for in-country (foreign) requirements.
- The Office of Counsel acts as the liaison between the University and the law enforcement community, including the FBI. A faculty member that is contacted by a member of the law enforcement community seeking information or requesting a meeting regarding their international collaborations (or broader research activities), is strongly encouraged to consult with their Dean/Chair and the Office of Counsel.

⁹ [Cancer Center Moves Against Scientists Over Data-Security Concerns](#), The Wall Street Journal, April 22, 2019

¹⁰ [Emory University Fires 2 Neuroscientists Accused of Hiding Chinese Ties](#), Time, May 25, 2019

¹¹ [Terminated Emory researcher disputes university’s allegations about China ties](#), Science, May 24, 2019

¹² [University of Kansas Researcher Indicted for Fraud for Failing to Disclose Conflict of Interest with Chinese University](#), Department of Justice News, August 21, 2019

Key Actions and Information Items

The USG and its agencies have expressed increasing concern regarding international collaboration that could be used to negatively impact national security and US competitiveness, and the University recommends that all members of the Rochester community follow the general principle of transparency in all of these activities. This includes proactively engaging the offices noted in this guidance when considering international engagements.

Researchers may contact the Office for Global Engagement at global@rochester.edu to indicate any international connections and seek advice regarding international collaboration.

Disclosing International Collaborations and Support

University researchers should disclose all international research connections and collaborations to the University and to any U.S.-based funding agencies supporting the research prior to the collaboration taking place. If the collaboration is already underway, researchers should apprise the University and relevant U.S. funding agencies of these collaborations, issuing updates as any changes occur and/or requests for information are made.

The [Office for Global Engagement](#) (Global) supports the University's international collaborations, including academic and research links abroad. This office should be consulted whenever an agreement with an entity outside the US is being negotiated. The [Office of Research and Project Administration](#) (ORPA) exists to support the management of funded research projects and related agreements, including funded activities abroad, and this office, equally, can serve as a central point of contact for any funded research projects involving international collaboration.

Full Disclosure of Other Support

University researchers should ensure they disclose all applicable “Other Support” as required by federal sponsors. “Other Support” may include resources and/or financial support, domestic or foreign, available in support of a researcher's research endeavors. Such support should be disclosed on an “Other Support” or “Current & Pending” form. Sponsor guidelines may specify that all sources of support be disclosed, regardless of whether they are awarded through the University, through another institution, or provided directly to the researcher.

Most U.S. federal sponsors will have their own guidance on how to complete “Other Support” forms. A compilation of U.S. federal agency Other Support requirements can be found [here](#). It is ultimately the responsibility of the individual researcher to ensure that the Other Support statement is complete and accurate to the best of his or her knowledge. If a Principal Investigator (PI) identifies an omission or error in a previously submitted proposal or progress report, he or she should contact his/her [ORPA Research Administrator](#) to have the error corrected.

Foreign Talent Programs

An issue that is garnering a great deal of scrutiny by the federal government is participation in **foreign talent programs**.¹³ For example, the Department of Energy federal and contractor employees are now prohibited from

¹³ [U.S. Targets Efforts by China, Others to Recruit Government Scientists](#), The Wall Street Journal, June 10, 2019

participating in certain foreign government talent recruitment programs¹⁴. Not only should participation in a foreign talent program be disclosed to U.S. federal sponsors **PRIOR** to participation, University researchers should also reach out to their Dean or Research Dean to discuss such activity, even if they've previously disclosed their participation to other university officials. Depending on an individual's research portfolio, he or she may be advised to reconsider his or her affiliation with the foreign talent program.

Grants for Research from Foreign Entities

Always involve ORPA early in the process when considering research funding from international sponsors. ORPA will assist researchers to ensure that grants and contracts protect University research, including the ability to publish without unreasonable delay, protection of Intellectual Property (IP), and that international sponsors are financially viable and in compliance with U.S. regulatory requirements.

Gifts from Foreign Entities

Researchers may also be presented with gifts, which may include donations of money, property or resources from foreign entities, with no clear expectation of direct benefit to the donor. These may fall into one or more categories and there are several important considerations and requirements:

Gifts to the University. If an employee is presented with or receives a gift from any source in connection with their research, this should be reported to Advancement for proper handling. If the gift is intended to support the employees research, the University and researcher may have additional reporting requirements to applicable research sponsors. For example, the gift may need to be disclosed as "Other Support" to the National Institutes of Health (NIH) or to the National Science Foundation (NSF). Please see disclosure of other support above and contact your [ORPA Research Administrator](#) if you have additional questions regarding agency reporting requirements.

In addition to funding agency requirements, the Department of Education requires the University to report gifts received from any foreign source, contracts with a foreign entity, and any ownership interests in or control over the institution by a foreign entity. Thus, failure of employees to report these items internally could place the University at risk for financial penalties.

Gifts to individuals. An employee may need to disclose an individual gift pursuant to the University's Faculty Conflict of Interest and Commitment Policy described below. Additionally, a general overview on the University's policy regarding the receipt of gifts is found in the [University of Rochester Code of Conduct](#). For these individual gifts, foreign gifts above a [minimal value](#) (currently \$390 or less) should be reported. In some cases, the University and researcher may have additional reporting requirements to applicable research sponsors. As noted above, a gift (regardless of value) may need to be disclosed as "Other Support" and contact your [ORPA Research Administrator](#) if you have additional questions regarding agency reporting requirements.

Agency reporting policies regarding foreign gifts continue to evolve and additional guidance will be provided as these requirements are finalized.

¹⁴ [DEPARTMENT OF ENERGY FOREIGN GOVERNMENT TALENT RECRUITMENT PROGRAMS](#), June 7, 2019

Other Remunerations from Foreign Entities

Significant financial interests received from any foreign entity, including governments, universities, and companies, must be disclosed in accordance with the [University's Faculty Conflict of Interest and Commitment Policy](#). The definition of "significant financial interest" is included in this policy, which requires disclosure of remuneration from foreign entities greater than \$5K, while investigators sponsored by U.S. Public Health Service agencies are required to disclose any reimbursed or sponsored travel paid from foreign entities related to institutional responsibilities. Significant financial interests could include income from consulting activity, teaching at foreign universities, direct equity or ownership in companies or other entrepreneurial ventures related to one's area of research. If you are unsure whether a particular interest or remuneration meets this definition, please contact your Dean or ORPA.

An important mechanism by which faculty may receive material support from foreign universities or a foreign government is through the existence of laboratories in a foreign country, over which a faculty member has oversight or in which they have access to laboratory resources. These arrangements are receiving significant scrutiny at the federal level, and create potential conflicts of interest/effort at the faculty member's home institution. While not prohibited, these arrangements must be handled with extreme care, and should not be undertaken without prior agreement from the faculty member's Dean and ORPA. Once established, resources accruing to the faculty member through such laboratories must be reported as Other Support in grant applications and progress reports.

Foreign Components of Federally Funded Research

Foreign components of federally funded research should be disclosed on proposals, progress reports, and final technical reports. Under the NIH Grants Policy Statement, a **Foreign Component** is defined as "any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, **whether or not grant funds are expended.**" The definition of "foreign component" (which can be found [here](#)) may include a large number of collaborative activities, including "collaborations with investigators at a foreign site anticipated to result in co-authorship; use of facilities or instrumentation at a foreign site; or receipt of financial support or resources from a foreign entity." Other sponsors have similar requirements to disclose foreign components. Additional guidance on other agency positions can be found [here](#).

There are multiple ways in which foreign components can be disclosed, including:

- Identifying a "foreign component" in a grant application;
- Listing a "non-U.S. performance site";
- Identifying foreign relationships and activities in a biosketch;
- Checking "yes" to the question on the [University Proposal Sign-off Form](#) asking, "Does this project involve international partnerships, activities or employment in foreign countries?"
- Financial resources should be disclosed even if they relate to work that is performed outside of a researcher's appointment period. For example, if a researcher with a 9-month appointment spends two months at a university outside of the U.S. during the summer conducting research under a foreign award, that activity should be disclosed.

PIs should review all pending proposals and active awards to ensure that all foreign components have been disclosed. If a PI identifies an omission or error in a previously submitted proposal, the PI should contact the relevant [ORPA Research Administrator](#) to have the error corrected.

Other Agreements and Arrangements (MOUs, Exchange, Affiliations, etc.)

The [Office for Global Engagement](#) serves as the coordinating office for international agreements that do not pertain to grants or funding coming to Rochester. Contact [Global](#) for guidance, agreement templates, copies of existing agreements, assistance with negotiation, and any other questions related to international partnerships and collaboration.

Hosting Visitors

The University fully supports the hosting of foreign visitors, including students, researchers, officials and other individuals to advance our mission. Certain actions are required before issuing an invitation or sponsoring a visa, in part to ensure that the proposed activities may be legally performed at the University. Steps to ensure a successful visit without subsequent complications vary with the type of visitor, the duration of their stay, and their activities while they are here. The sections below describe these steps based on the type of visitor (Visiting Student, Visiting Faculty and Researchers, etc.). If you still have questions after reviewing these guidelines, please contact the [Office of Global Engagement](#).

Special measures may need to be taken if the individual has an ongoing affiliation with a restricted party or if the University site being visited contains export controlled equipment, software, source code or other confidential information. Access to such facilities may need to be restricted or a license issued by the USG may be required to allow the visitor access. Please contact the University's [Export Control Officer](#) for assistance in determining if a license is required.

Follow the appointment processes below for students and visiting faculty/researchers to ensure that appropriate screenings are undertaken and policies are followed.

Visiting Students

Visiting Students pursue activities of an educational or academic nature, often to further their undergraduate or graduate studies at their home institution. All visiting students must have a home department and a faculty sponsor while at Rochester. Global Engagement coordinates the application and onboarding process for all [visiting students](#), including restricted party screening, and departments should follow the process outlined on their site.

Visiting Faculty and Researchers

All visiting faculty and researchers undertaking significant research or teaching activities at Rochester should have a formal appointment at the University.¹⁵ Departments should follow their school's process for appointing visiting faculty and researchers. This process should include ensuring that the visitor signs a Visiting Scientist Agreement.

¹⁵ See University of Rochester [Faculty Handbook](#), IV.B.1 Faculty Policies, Special Faculty Titles, Visiting Faculty

In the case of international visitors, hosts should contact Global Engagement early in the process to assist with obtaining the appropriate Visa and to conduct restricted party screening.

It is also important to ensure that visiting collaborators and researchers understand the University's [Intellectual Property Policy](#) and limitations on their use of University owned resources and intellectual property after they have returned to their home institutions.

Additional guidance to clarify categories of visiting faculty and researchers and related processes are under development at the time of this writing.

Short-Term Visitors:

Including Lab and Facility Visits; Guest Lecturers; Speakers

The University welcomes visitors to our campus, including tours of our state of the art research facilities. While visitors conducting research, teaching or involved in related activities on campus should have a formal appointment (detailed above), this section is focused on brief visits/tours that could include foreign students, researchers, faculty, international officials or other individuals. (Note: the precise definition of what is meant by short-term is an area of active review, and more explicit guidelines are expected within the year.) Best practices for hosting any international visitors include the following steps:

- Ensure that no confidential or proprietary information is visible or discussed at the time of the visit, and appropriate measures for safeguarding sensitive information are in place.
- Escort visitors throughout lab and facility tours, ensuring that visitors are not left unattended during their visit.
- Ensure that no University material or equipment is removed from campus without appropriate prior review and approval by University administration. (For example, when transferring biological material to another institution, please contact ORPA to implement a material transfer agreement).
- If you have any questions whether a visitor appears on any USG restricted party list that would impact the University's ability to host the visitor or collaborate with their home institution, please contact [ORPA](#) or the [Office for Global Engagement](#) to perform restricted party screening prior to the visitor's arrival on campus.
- For researchers and facilities focused on areas of competitive research and emerging technologies that may lead to sensitive results (e.g., nanotechnology, quantum, genomics, advanced manufacturing) additional measures should be considered. Such measures may include mandatory restricted party screening and maintenance of a permanent log of visitors in the facility. This will provide a tiered risk-based approach, where the highest risk facilities, such as the Laboratory for Laser Energetics, have its own rigorous process for hosting visitors that supersedes these guidelines. Additional details on this tiered risk-based approach and a guide/protocol for short-term visitors will be provided in the future as federal guidelines evolve.

Data Security

It is critical to ensure the appropriate use of data, including all aspects of the access, handling and management of data. The University has established [data security classifications](#) to help guide in the appropriate controls for

different types of data. Additionally, broader data governance initiatives in the [Office of the Provost](#) provide additional resources to address aspects of data storage, use and security. Proper protocols for ensuring data security should be followed at all times, particularly when the data relate to competitive research and emerging technologies.

Visas

The University of Rochester is authorized to sponsor visas for foreign nationals to enter the U.S. and be present at the University for study, research and exchange, and for employment. For students, faculty, staff or researchers on the University's visa sponsorship, all U.S. immigration procedures should be coordinated through the [International Services Office \(ISO\)](#). Once on campus, any change in the student's or scholar's department, field of study, access, funding, or any other immigration affirmations must be reported and coordinated through ISO; otherwise individuals risk jeopardizing their visa status.

Departments and units hosting individuals who are on visas not sponsored by Rochester should notify the [Office for Global Engagement](#) of the visitor's name, home institution, citizenship and nationality, purpose and duration of visit.

Travel Abroad

International travel is an integral part of the academic, research, and healthcare mission of the University of Rochester, and the University broadly encourages and supports international travel by its faculty, staff, and students in support of that mission. Global Engagement works to support Rochester's travelers abroad and provides a variety of [pre-departure checklists and resources](#) for faculty and staff. University of Rochester travelers are recommended to take the following steps prior to travel. Note: Faculty traveling with students or devising arrangement for students traveling abroad should follow the steps outlined in the University's [International Travel and Program Development Policy](#).

Travel Registry

Registering travel (individually or completed by department) in Rochester's [travel registry](#) is strongly recommended; doing so ensures that the University can assist individuals and their family in the event of an emergency abroad. Options exist in the Registry to upload a copy of a passport or photo into the registry which allows Global Engagement to assist more efficiently in the event of loss of passports or in the event of an evacuation. Additionally, travel registration provides an efficient mechanism to further report foreign collaborations and provide travelers with information regarding potential risks. If you have U.S. federal funding and intend to pay for this travel from your grant/contract, sponsor approval may be necessary. Please contact your [ORPA Research Administrator](#) if you have any questions regarding sponsor approval; contact Global Engagement's [travel security manager](#) for questions about the Travel Registry or about international travel.

Visa Assistance

Obtain a visa for your destination. Rochester utilizes a visa expediting service, [Visa Central](#), which makes the application process easier. This portal allows the traveler to input specifics (nationality, destination, etc.) and to receive specific guidance and instructions.

Protecting your Data While Abroad

Protecting University data while traveling is extremely important. Review [University IT's guidance for international travel](#) and consult with [Information Security](#) for guidance on safeguarding data while traveling abroad, considering your destination and the potential risks. Check with your department to see if a sanitized "loaner" laptop is available to help avoid exposing your data to inspection. Avoid carrying any sensitive, confidential, or proprietary data. Additionally, avoid using a USB ("thumb") drive or other portable media given to you while traveling.

Publications, IP & Other Collaborations

Publications

1. **Affiliations** – Authors should list their primary/home institution (University of Rochester) as their primary affiliation in all publications.
2. **Publication Approval Restrictions** – If a sponsor or collaborator imposes any restrictions (e.g., the right to approve) on a University publication, this means that the research results may no longer be defined as being the product of fundamental research and consequently may be subject to U.S. export control laws, including potential deemed export restrictions (see definition on page 4). Any publication restrictions must be approved by the President in accordance with the University's Openness in Research Policy. Additional information can be found [here](#).

Intellectual Property

Faculty should notify [UR Ventures](#) early in the process when their research may lead to potential new inventions. ORPA and UR Ventures work together to negotiate, administer and address IP issues at the University of Rochester. The following [site](#) is intended to outline the University IP Policy, while this [link](#) provides guidance on related IP issues to consider when conducting research. Sensitive or confidential research results or methods should only be shared under an appropriate Non-disclosure Agreement or Material Transfer Agreement.

If you have concerns or have reason to believe that there has been a theft of University intellectual property, please contact the [University's Office of Counsel](#).

Visiting, Secondary, or Honorific Appointments Abroad

Rochester's Faculty Handbook includes general language about visiting professorships (p. 31¹⁶):

It is often appropriate that a faculty member of the University of Rochester hold simultaneously an appointment at another institution. Examples would be during a summer period (for those on nine-month appointments) or an academic leave. It is quite common for faculty to visit other institutions at such times, and entirely fitting if (for instance) a "visiting professorship" or something like it is arranged to give the individual appropriate status and access to facilities at the institution that is being visited. When the individual is not being paid full time by the University of Rochester for such a period, they are free to negotiate such a title – with or without salary – with the other institution for whatever fraction of time is not paid by the University of Rochester.

By contrast, during periods in which an individual is on full-time pay from the University of Rochester and is not on leave, the simultaneous holding of a title, with or without salary, at another academic institution, or at any institution if remuneration is involved, must be with the concurrence of the department and school of the University of Rochester. In such circumstances, the individual should begin by discussing the matter with the chair (or the dean if there is no chair). In considering whether to approve an appointment at another institution when remuneration is involved, the chair should be guided by the present policy on consultation. (See "Consulting.") If the chair approves an arrangement with the professor, the professor should set down that approval in writing along with an explicit statement of their understanding of the terms of the agreement. If there is any consideration of a substantial amount of time away from the University, in association with an appointment elsewhere, the chair should discuss the matter with the dean.

¹⁶ http://www.rochester.edu/provost/assets/PDFs/Faculty_handbook.pdf