

DEPARTMENT OF HEALTH AND HUMAN SERVICES

NATIONAL INSTITUTES OF HEALTH

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Subcommittee on Investigations and Oversight

Research Security: Examining the Implementation of the CHIPS and Science Act and NSPM-33

Patricia Valdez, Ph.D.

Chief Extramural Research Integrity Officer

National Institutes of Health

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Chairman McCormick, Ranking Member Sykes, and distinguished Members of the Subcommittee,

Thank you for the opportunity to testify before you today on behalf of the National Institutes of Health (NIH). My name is Dr. Patricia Valdez, and I serve as the Chief Extramural Research Integrity Officer at NIH. I've been involved in NIH's efforts on research security and foreign interference for almost 10 years now. NIH plays a central role in shaping the biomedical research landscape of the United States. The scale of NIH's investment and partnerships reflects not only a mission to advance health and discovery, but a duty to protect the integrity of taxpayer-funded science. NIH executes this responsibility through a comprehensive approach that integrates clear disclosure requirements with coordinated risk-review and compliance systems.

NIH must guard against misuse of its funding and resources, and the agency must pursue such collaborations judiciously, acknowledging that risks may not always be immediately apparent. Therefore, knowing exactly where every dollar is going and to whom is of paramount importance. NIH has no tolerance for breaches of integrity or misuse of federal taxpayer funds. It is particularly concerning when problematic behavior occurs at the instigation or support of malign foreign actors.

NIH's compliance efforts aim to ensure proper stewardship of Federal funds and to safeguard the research enterprise from foreign interference while protecting the integrity of research. NIH is specifically tackling undisclosed sources of foreign research support that can lead to misinformed funding decisions, conflicts of interest that result in awards being overseen without appropriate mitigation, violations of peer review integrity rules, and repeated misrepresentations reported to institutional officials and NIH during compliance inquiries. Our approach is multi-faceted and drives NIH's risk-review and institutional engagement approach to ensure oversight remains focused on protecting the integrity of U.S. -funded biomedical research and strengthening research security in partnership with institutions across the country.

For example, in 2018, NIH undertook an extensive effort to ensure recipient institutions are prepared to mitigate against undisclosed foreign employment, undisclosed research support, conflict of interest, and breaches of peer review integrity. Over the next several years, NIH released reminders and clarifications for the community about policies on disclosures of foreign other support and financial interests and maintaining security and confidentiality in peer review. In 2021, NIH strengthened disclosure forms by requiring certification of other support by senior key personnel who are accountable for reporting. NIH has also strengthened internal capacity to detect signs of foreign interference or disclosure non-compliance among covered individuals including senior/key personnel. This year, in 2025, NIH implemented a system to fund foreign collaborations as direct sub-project grants instead of subawards to improve oversight of funds going to foreign sites. At the same time, NIH continues to support international scientific cooperation as an essential part of innovation and global competitiveness and recognizes that

properly conducted international collaborations are integral to the United States remaining competitive.

Consistent with the NIH Grants Policy Statement, NSPM-33, the NSPM-33 Implementation Guidance, and 2 CFR 200.206, NIH applies its disclosure assessment Matrix for initial assessment. Only active participation in a malign foreign talent recruitment program is automatically disqualifying under this Matrix. All other foreign engagements and activities may increase risk ratings or trigger mitigation recommendations, including contacting recipient institutions for additional information. NIH's compliance review process remains risk-based, consistent, and applied without discrimination or assumptions tied to national origin or identity.

For most allegations, NIH closes compliance reviews internally without reaching out to institutions. When institutional outreach does occur, NIH works in coordination with institutional leadership, who may carry out their own internal investigations and impose administrative or employment actions according to their policies and considerations of due process.

Since 2018, NIH's Office of Extramural Research has received almost 700 allegations and has contacted institutions regarding 271 of these allegations focused on undisclosed foreign research support, some of which overlapped NIH-funded work, conflicts of commitment, and undisclosed financial interests leading to financial conflicts of interest. Nearly all cases were resolved through administrative remedies involving hundreds of grants and institutional actions. Escalation to Inspectors General or Department of Justice (DOJ) offices occurs only depending on material facts, intent, pattern, or potential harm to agency or US interests. In 53 cases, NIH has worked closely with DOJ and the Department of Health and Human Services Office of Inspector General to recover approximately \$37.8 million in repayments, again the majority through administrative processes.

Policies implemented under NSPM-33 have prioritized clarity over ambiguity. They emphasize transparency, fairness, and risk-based review and explicitly caution against retroactive application of requirements, which could fuel prejudice or create negative effects on researchers. NIH supports this policy intent and applies its disclosure assessment Matrix, accordingly, using automatically disqualifying criteria only when active participation in malign talent recruitment programs is identified. Grant documents submitted to the agency must contain information that is true, complete, and accurate, and senior/key persons must personally certify the accuracy of their reported other support. Institutions have indicated that NSPM-33-aligned requirements offer clearer expectations and more centralized guidance. While establishing new processes can feel significant, institutions have been strong partners as they recognize the seriousness of these issues.

This administration has made review and prevention of foreign interference at the NIH a priority. To this end, NIH continues to coordinate with HHS' Office of National Security. NIH conducts regular foreign interference compliance reviews to protect the integrity of federally funded

research while preserving legitimate international scientific collaboration. Allegations related to foreign influence, funding overlap, conflicts of commitment, and undisclosed financial interests peaked in 2018 and 2019, and have declined sharply beginning in 2020. In those earlier years, institutional self-disclosures represented just over 10 percent of foreign inference cases, but in recent years, institutional self-disclosures account for over half of all reports to NIH. This shift likely reflects improved awareness and compliance with disclosure requirements at universities and research institutions rather than increased interference activity.

NIH recently announced research security training requirements for senior/key personnel listed on NIH grant applications, in accordance with the CHIPS and Science Act, to strengthen knowledge and compliance related to topics of cybersecurity, international collaboration, disclosure requirements, conflict of commitment, and conflict of interest. The National Science Foundation (NSF), in partnership with NIH, the Department of Energy (DOE), and the Department of War (DOW), have provided online training modules as a resource to the extramural community. Along with our agency partners, NIH has implemented common disclosure forms in which senior key personnel must certify that they do not participate in a malign foreign talent recruitment program. NIH has been transparent in its efforts, and all policies can be found on NIH's website.¹ NIH has partnered with the White House Office of Science and Technology Policy, NSF, DOW, DOE, and other federal science agencies to strengthen research security standards and streamline disclosure processes so that compliance expectations, application materials, and guidance remain clear, practical, and consistent for the research community. NIH continues to support research-security program development, interagency coordination, and international engagement while reinforcing that honesty, transparency, and funding-overlap prevention remain non-negotiable requirements. NIH will continue to protect the integrity of U.S. government-funded biomedical research by partnering with institutions and investigators, prioritizing compliance corrections where possible, and escalating concerns only when facts warrant it, consistent with federal law and nondiscrimination obligations.

NIH values its ongoing collaboration with Congress and appreciates the Committee's partnership in strengthening research integrity and ensuring that security measures support scientific collaboration.

Thank you again for the opportunity and I look forward to answering your questions.

¹ grants.nih.gov/policy-and-compliance/policy-topics/foreign-interference