

DEPARTMENT OF HEALTH AND HUMAN SERVICES

NATIONAL INSTITUTES OF HEALTH

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Between the United States and the Chinese Communist Party**

Protecting American Innovation: The Federal Research Security Enterprise

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Chairman Moolenaar, Ranking Member Khanna, and distinguished Members of the Committee,

Thank you for the opportunity to testify 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. For nearly a decade, I have led NIH's efforts to strengthen research security, promote research integrity, and address foreign interference in federally funded biomedical research.

NIH is the world's largest public funder of biomedical research, supporting discoveries that improve health, drive innovation, and strengthen America's leadership in science and technology. With this investment comes a responsibility to ensure that taxpayer-funded research is conducted with integrity, transparency, and accountability.

Research security is fundamental to that responsibility. NIH is committed to protecting the U.S. biomedical research enterprise from foreign interference, undisclosed conflicts of interest and commitment, funding overlap, and other activities that threaten the integrity of federally funded research. At the same time, NIH recognizes that appropriately managed international scientific collaboration remains essential to scientific progress and U.S. competitiveness. Our approach is designed to protect both security and openness through clear disclosure requirements, risk-based oversight, strong institutional partnerships, and close coordination with our Federal partners.

The United States leads the world in biomedical research because it has fostered an open, collaborative, and innovative research enterprise. However, that openness has also made the research enterprise an attractive target for foreign governments and other malign actors seeking to acquire research, expertise, technologies, and intellectual capital developed through U.S. taxpayer investments. NIH's research security efforts are designed to address these risks while preserving the collaborative environment that has long fueled biomedical innovation. Knowing where every taxpayer dollar is going, and to whom, is fundamental to NIH's stewardship responsibilities.

Since 2018, NIH has significantly strengthened its research security program by improving disclosure requirements, expanding compliance oversight, increasing institutional engagement, and enhancing coordination across the Federal government. NIH has issued updated guidance regarding foreign Other Support, conflicts of interest, conflicts of commitment, and disclosure requirements; implemented a research security training requirement and a prohibition on participation in malign foreign talent recruitment programs; and enhanced its internal capabilities to identify potential disclosure noncompliance and indicators of foreign interference. Most recently, NIH established a new award structure for foreign collaborations that replaces traditional foreign subawards with linked foreign subprojects. Under this approach, foreign collaborators receive separate, directly linked NIH awards rather than being nested under a domestic recipient's grant, providing NIH with greater transparency into foreign research activities, stronger financial accountability, improved tracking of Federal funds, and enhanced oversight of international collaborations while continuing to support appropriately managed

global scientific partnerships. This new award structure also addresses recommendations from the Government Accountability Office (GAO) to strengthen NIH's oversight of foreign collaborations and the use of foreign subawards.

NIH employs a risk-based approach to identifying and addressing potential research security concerns throughout the grant lifecycle. NIH reviews disclosures submitted with grant applications and throughout the award period to identify potential risks, including undisclosed foreign research support, scientific and budgetary overlap, conflicts of interest and commitment, and participation in malign foreign talent recruitment programs. NIH also takes actions to mitigate risks to the peer review system including breaches of peer review integrity.

Consistent with the NIH Grants Policy Statement, NSPM-33, the NSPM-33 Implementation Guidance, and 2 C.F.R. § 200.206, NIH uses its Decision Matrix for Assessing Potential Foreign Interference for Covered Individuals or Senior/Key Personnel ¹ to guide the initial assessment of potential foreign interference concerns involving covered individuals and senior/key personnel. The Decision Matrix provides a consistent, objective, and transparent framework for evaluating indicators related to foreign talent recruitment programs, foreign funding, and affiliations with foreign institutions or entities. Based on these indicators, NIH determines whether mitigation measures are required, recommended, suggested, or whether no mitigation is needed. Active participation in a malign foreign talent recruitment program is the only factor that is automatically disqualifying. All other foreign engagements and activities are evaluated on the specific facts and circumstances and may increase an individual's risk rating or result in mitigation recommendations, including requests for additional information from recipient institutions.

For most allegations, NIH closes its compliance reviews internally without outreach to recipient institutions. When institutional engagement is warranted, NIH works closely with institutional leadership to obtain additional information, clarify disclosures, and implement corrective actions where appropriate. The majority of cases are resolved through administrative actions and institutional oversight. When the facts indicate potential fraud, intentional misconduct, or other violations of Federal law, NIH coordinates with the HHS Office of Inspector General and the Department of Justice.

NIH's research security efforts have produced measurable results. Since 2018, NIH has received over 700 allegations involving potential foreign interference, undisclosed foreign research support, conflicts of commitment, funding overlap, and undisclosed financial interests, and has identified possible non-compliance in 273 of those matters. Most cases have been resolved through administrative actions taken by NIH and recipient institutions. In 55 cases involving

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<https://grants.nih.gov/sites/default/files/NIH%20Decision%20Matrix%20for%20Assessing%20Potential%20Foreign%20Interference%20for%20Covered%20Individuals%20or%20Senior%207%2026%2024%20clean.pdf>

more serious concerns, NIH coordinated with the Department of Justice and the HHS Office of Inspector General, resulting in approximately \$39.6 million in recovered funds.

NIH has also seen meaningful improvements in institutional compliance. Allegations related to foreign interference peaked in 2018 and 2019 and have declined substantially in subsequent years. During that same period, institutions have become increasingly proactive in identifying and reporting potential concerns. Whereas institutional self-disclosures represented just over 10 percent of reported cases in the early years of NIH's research security efforts, they now account for more than half of all reports received by the agency. This shift reflects stronger institutional oversight, greater awareness of disclosure requirements, and a shared commitment to protecting the integrity of federally funded biomedical research.

Research security requires sustained coordination across the Federal government. NIH works closely with the White House Office of Science and Technology Policy, the HHS Office of National Security, the National Science Foundation, the Department of Defense, the Department of Energy, and other Federal partners to strengthen research security policies, improve information sharing, harmonize disclosure requirements where appropriate, and provide research security training and guidance to the extramural community.

Research security is essential to protecting the integrity of the Nation's biomedical research enterprise and ensuring that taxpayer-funded research advances U.S. interests. NIH will continue to strengthen its research security program through implementation of its Decision Matrix, enhanced oversight of foreign collaborations through linked foreign subprojects, close collaboration with research institutions, and coordination with Federal partners while supporting the international scientific collaborations that remain critical to scientific discovery, innovation, and America's global leadership in biomedical research.

Thank you for the opportunity to testify today. I look forward to answering your questions.