



Foreign Influence on U.S. Research

The U.S. Government is currently acting to protect U.S. research interests from undue foreign influence, by increasing government oversight in an attempt to thwart those seeking to threaten our position as a global leader in research and technology development.

The U.S. Government is especially concerned about the active recruitment of foreign scholars into “foreign talent (recruitment) programs” by governments overseas, and their apparent attempts to influence foreign nationals to misappropriate federally funded research results and intellectual property from U.S. institutions of higher education. Although there is no agreed-upon government definition of a “foreign talent program” or “foreign talent recruitment program”, one example is China’s “Thousand Talents Plan”. The University of Miami (UM) is committed to national security and economic prosperity, as well as to openness in research, the free exchange of scholarly ideas, and appropriate international collaboration.

UM's Support for Global Engagement

UM's Office of Hemispheric and Global Affairs aims to foster global connections by building and sharing platforms to catalog the University's hemispheric and global engagement, and to create new and strengthen existing connections with international partners. **Global engagement is clearly a net positive for UM, and international collaboration and exchange are major UM priorities.** However, in limited circumstances, such activities could pose a risk of harm, loss of funding, or legal consequences for UM, its trainees, and/or its faculty. Taking steps in accord with established University practices will help ensure that international collaborations and other global engagement activities are transparent and in full compliance with applicable policies and regulations.

Best Practices for Foreign Relationships and Activities

The University expects faculty to be transparent about their professional activities on behalf of the institution and of outside entities. This allows institutional officials to more effectively support and coordinate high priority initiatives, comply with regulatory and sponsor requirements, and identify and manage risks, including, but not limited to, conflicts of interest and conflicts of commitment.

Some specific examples are below:

Faculty Annual Performance Review. Each faculty member generally submits an annual report summarizing teaching, research, service, and outside consulting activities, as well as other information deemed relevant by the provost, dean, department chair, division chief, or center director. Such an annual report should identify all international activities and engagements, funded or not, such as honorary appointments, consulting activities, student advisory committees, corporate boards, government advisory committees, and/or involvement with a talent development program.

Significant Financial Interests. A UM researcher who has a personal financial interest, related to his/her institutional responsibilities, that reaches UM's significance threshold must disclose this to the University; this requirement includes foreign financial interests as well as domestic. For more information, visit the [UDisclose](#) web page.



Sponsored Research Disclosures.

“Other Support” or “Current & Pending Support” Disclosure Requirements. “Support” in this context includes all financial resources, foreign and domestic, available to aid an individual’s research. University researchers are expected to disclose all such support as part of their federal funding proposals, typically on the “Other Support”, “Current & Pending Support”, or other similarly named sections. Recently, federal sponsors have become particularly concerned about participation in “foreign talent” programs. While participation in such programs is not banned, it is a source of support that must be disclosed. Depending on the sponsor and proposed research, Key Personnel may be advised (or required) to terminate their affiliation with the foreign talent program in order to receive an award.

Foreign Components Requirements. Under the NIH Grants Policy Statement, “foreign components” must be disclosed on proposals, progress reports, and final technical reports. Adding a foreign component or transferring substantive programmatic work from a domestic recipient to a foreign component requires prior approval from NIH. A “foreign component” is defined as the performance of 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. Other federal and non-federal sponsors may have similar requirements. Faculty should work with the school/college or departmental research administration staff, or the [Office of Research Administration](#), to ensure compliance.

Restricted Party Screening. Restricted party screening is a best practice that should be conducted prior to investing significant time or effort in developing collaborations or agreements with new international entities. Restricted party screening identifies entities and individuals subject to U.S. export control restrictions, denial or debarment orders, sanction programs, as well as state and federal non-procurement programs. Restricted party screening is performed as part of normal business processes for export assessments, new vendor registration, risk assessment of new sponsors, subcontractors/subawardees, and parties to non-funded agreements, and to review international visitors. Additional information is available on the [Office of Research Administration’s Export Control Compliance](#) page.

International Travel

Basic information for individuals traveling abroad for University purposes is available on the [Risk Management](#) web page, and on the [Travel and Export Compliance](#) page of the Office of Research Administration.

Export Controls and Sanction Programs. Everything you take with you on international travel is considered an export, even if you bring it back or use it up while on travel. While licenses aren’t typically required for standard items to most destinations, it’s smart to request an assessment well in advance of travel to allow time to obtain licenses when necessary. Licenses are routinely required for University travel to and activities in or involving comprehensively sanctioned countries (e.g., Cuba, Iran, North Korea, Sudan, and Syria). Other countries, such as Pakistan, India, China and Russia, have either severely regulated or banned encryption technology. For additional information visit the [Export Control Compliance](#) page.



Federal/National Resources

- [NIH:Francis Collins memo on August 20, 2018](#)
- [NSF:Board statement](#)
- [DOD:John S. McCain National Defense Authorization Act for Fiscal Year 2019 \(NDAA FY19\)](#)
- [DOD: March 20, 2019, memo Under Secretary of Defense, Research and Engineering, Michael Griffin, directed that all new DOD Notices of Funding Opportunities pertaining to research and research related educational activities include a requirement that proposers provide the additional information on the other support and commitments of all key personnel, whether or not funded.](#)
- [APLU Statement on New Efforts to Bolster NIH-Funded Research Security](#)
- [DOE: Deputy Secretary of Energy issued memos on December 14, 2018, and January 31, 2019, detailing agency concerns related to inappropriate foreign influence and identifying specific actions that will be taken to manage risks.](#)

The first DOE memo directs the creation of a list of emerging “research areas and technologies that are in the U.S. national interest to limit sensitive country foreign nationals (SCFN) access,” referred to as the Science & Technology (S&T) Risk Matrix; sets enhanced vetting requirements for all foreign nationals visiting or assigned to DOE labs; prohibits SCFNs from certain activities; and generally prohibits travel to sensitive countries. DOE further plans to impose limitations on the activities of DOE personnel and those working on DOE contracts, as detailed in the second memo.

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