

Guidance:

Protecting Against Improper Foreign Influence in Research

Overview: The federal government has ongoing concerns about Improper Foreign Influence and Malign Foreign Talent Recruitment Programs with respect to research. This document provides brief guidelines for disclosure of foreign interests and best practices in future and ongoing research activities.

- **What do you need to disclose in your Northwestern Conflict of Interest disclosure?**

- All foreign and domestic Significant Financial Interests (e.g., payments, equity, reimbursed travel);
- All external positions and appointments (e.g., board service, visiting or honorary appointments);
- Any participation in a foreign talent recruitment program, malign or otherwise.

Disclosure is required in [eDisclosure](#) within 30 days of acquiring or becoming aware of a new relationship or financial interest. More information can be found in the [Policy on Conflict of Interest in Research](#).

- **What do you need to disclose to funding agencies?**

- All foreign and domestic academic, professional, and institutional positions and appointments must be included in your biosketch per agency requirements.
- All current and pending support, including grants, contracts, agreements, in-kind support, and external support for students and postdoctoral fellows,
- Any research performed outside of Northwestern (e.g., via consulting or other appointments)
- Any participation in programs sponsored by foreign governments, instrumentalities, or entities, including talent recruitment programs must be listed in your Current & Pending Support.

Federal agencies vary on when this documentation is required. Work with your research administrators to understand the terms of any project, and review Sponsored Research's [agency-specific resources](#).

- **What is a Foreign Talent Recruitment Program and a Malign Talent Recruitment Program?** Definitions can be found on the [Office of Research Security website](#). If you are receiving compensation (of any kind – monetary or non-monetary including honorariums) from a designated country of concern (China, Iran, North Korea, or Russia) review this [website resource](#) and reach out to the [Export Controls & International Compliance \(ECIC\)](#) team.

- **What has changed?** The federal government broadened the foreign talent plan definitions (malign and non-malign) and has prohibited participation in Malign Talent Recruitment Programs if you receive federal funding. Northwestern implemented these changes and prohibition by updating the [Policy on Conflict of Interest in Research](#) in January 2024.

- **How can you request Restricted Party Screenings for your collaborators?** Email the [ECIC](#) team to request Restricted Party Screenings for any current or future collaborators including potential appointments, international co-authors, and international conference organizers, etc. The screenings will identify if a person or organization is on a U.S. restricted list.

- **Where can I learn more?** To assist employees in navigating international partnerships and avoiding inadvertent issues, the Office for Research maintains a [webpage](#) with guidance on improper foreign influence.

Who can you contact with questions? If you have any questions related to disclosure, contact [NUCOI](#). Contact the [ECIC team](#) for general questions about talent programs or other international engagements.