

To: Northwestern Community
From: Office for Research, Vice President for Research
Re: Restricted Parties – Research Visitors

DATE: 04/15/2025

Research Visitors to Northwestern University are an essential component of our research enterprise. Allowing research visitors to engage in Northwestern research keeps us at the leading edge of science. When visitors are international, however, NU must consider the export control and research security regulations and avoid possible violations. When the risk of violation is too high, research visitors may be denied.

Overview: The federal government maintains lists of restricted parties, both individuals and organizations. Hosting Research Visitors from restricted parties (organizations/universities/companies) can create export control risks, including federal violations, as well as raise researchers' risk profile with the federal government. The risk matrices vary by agency, and the restricted party lists change over time, so the [Export Controls & International Compliance](#) (ECIC) team will conduct regular screenings.

Northwestern will not routinely sponsor **Research Visitors**, including interns, from the following U.S. restricted lists or similar U.S. restricted lists if the person themselves is on a U.S. restricted list or their home institution/employer/funder is on a U.S. restricted list. There is a limited appeal/waiver process for certain instances.

List Name	Description
U.S. Denied Persons list And U.S. Denied Entity List	Requires a federal license to share/export anything with a denied person or entity. Presumption of denial, which means the U.S. government will almost certainly reject the license.
U.S. OFAC Specialty Designated List	The person or entity's assets are blocked, and U.S. persons are generally prohibited by federal law from dealing with any entity on the OFAC list.
DOD 1286 List	Foreign institutions engaging in problematic activity and foreign talent programs posing a threat to national security.
U.S. "Unverified List"	Parties listed on the Unverified List (UVL) are ineligible to receive items subject to the Export Administration Regulations (EAR) by means of a license exception.
Malign Foreign Talent Recruitment Program (MFTRP)	The CHIPS & Science Act provides a definition of MFTRP—essentially a talent program requiring one or more problematic actions and having problematic sponsorship. A detailed definition is available here . Research visitors cannot be MFTRP members.

What does this mean? The Office for Research will no longer accept Research Visitors, including interns, on U.S. restricted lists or who are employed/supported/funded by a restricted entity unless an appeal/waiver is granted.

- **Potential Research Visitor is on a U.S. Restricted List:** If a potential Research Visitor is on a U.S. restricted list the Office for Research will **not** approve the visitor request. There is no appeal or waiver process for individuals on restricted lists as they will almost certainly not be granted a Visa, and they pose a very high export control and international compliance risk.
- **Potential Research Visitor's Current Home Institution/Employer/Funder is on a U.S. Restricted List:** If the potential Research Visitor's home institution, employer, or funding agency is on one of the above U.S. restricted lists, the Office for Research will also **not** approve the request. With the approval of the department leadership (Dean, ADR, and Chair), the sponsoring department may request a waiver from the VPR, Office for Research. Waivers may be granted under rare circumstances due to the risk level. For example, if the potential Research Visitor has special and unique technical abilities or experience that cannot be found elsewhere. If the waiver is approved, the sponsoring faculty and department leadership will sign a control plan, developed by the ECIC team, to mitigate the risks. *Email your appeal/waiver request to exportcontrols@northwestern.edu*
- **Potential Research Visitor's Former Home Institution/Employer/Funder is on a U.S. Restricted List:** The Research Visitor **may** be approved, and a cautionary letter will be issued from the Office for Research, ECIC team, to the sponsoring faculty member with guidance and control recommendations.

Scope: The scope of this guidance is [Research Visitors](#) including interns. This guidance supersedes any previous guidance from the Office for Research. Please continue to use the Research Visitor process which includes screenings.

Contact the Export Controls and International Compliance (ECIC) team for any questions at exportcontrols@northwestern.edu

