



Research Compliance & Integrity

February, 2024



FOREIGN INFLUENCE DISCLOSURES

Required disclosures

You should already disclose any of the following received from a foreign entity (or University):

- In-kind support
- Research funding
- Money to you
- Travel funding

[See NSF disclosure table](#)

"Principled international collaboration is critical to success, but improper foreign influence is a threat to international collaboration in the science and technology enterprise. It is important to distinguish the difference." [NSF](#)

Federal Rules

[Congress](#) prohibits participation in MFTRPs by federally funded researchers. Federal agencies are implementing this policy: [DOD](#) & [NIH](#) policies.

Effective [May 20, 2024, NSF Biographical sketch requires: 1\) disclosure of involvement with a foreign talent recruitment program and 2\) certification by key personnel that they are NOT associated with an MFTRP.](#)

Q: What is an MFTRP?

A: Malign Foreign Talent Recruitment Program

Q: How do I know a foreign program is "malign?"

A: The **program is sponsored by a foreign country of concern, or University or program on the ["Entity" list](#)** and provides you, or promises to provide you in the future, any of the above-left items in exchange for any of the following:

- Providing it material, data, or nonpublic information
- Being required to recruit trainees/enroll researchers in a program
- Undertaking employment or research in the foreign country
- Being unable to terminate the agreement
- Being required to apply for funding from the foreign government
- Omitting acknowledgement of affiliation with the foreign entity on publications
- Being required to not disclose the association to U.S. Federal agencies

Not an MFTRP activity:

- Presenting and publishing non-controlled scientific information
- Participating in conferences/exchanges in an open and reciprocal environment
- Advising a foreign student enrolled at a university, or writing a recommendation if requested by the student

Case studies of penalties

[Harvard professor guilty of not disclosing involvement in Thousand Talents Program](#)

[OSU professor guilty of not disclosing foreign funding](#)

For more information on what must be disclosed, take the [NSF training on disclosures](#)

For more information on research security, in general, and balancing the need for international collaboration with the need for research security, take the [full NSF training series](#):

For more information on research compliance and integrity, contact the University of Akron Research Compliance Officer
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