Research Integrity & Undue Foreign Influence

Why Foreign Influence Matters

As tensions between the U.S. and various foreign governments increase, accusations of academic espionage by foreign-supported researchers at U.S.-based research institutions are on the rise. The NIH, NSF, DOE, and other agencies are increasingly warning institutions of researchers who have not disclosed foreign associations in compliance with grant funding regulations and other laws. The government continues to initiate enforcement actions and we expect this to increase in frequency and scope during the coming months.

As a result, research and academic institutions in the U.S. need to be ever more vigilant to mitigate brand risk, the loss of federal funds, intellectual property assets and exposure to enforcement actions.

Know Your Collaborators and Sources of Talent

- The U.S. Senate's Permanent Subcommittee on Investigations has raised concerns that Chinese talent recruitment contracts may violate U.S. standards for research integrity, and listed examples of alleged research misappropriation involving the following recruitment programs:
 - Thousand Talents Plan

Jinshan Scholars Program

973 Program

- Changjiang Scholars Program
- **Shuguang Program**
- The Subcommittee has also identified a number of agencies and recruitment programs as essential to China's Strategic Plan for Talent Recruitment and therefore programs worthy of additional scrutiny:
- CPC Central Committee Organization Department
- Chinese Academy of Sciences
- Chinese Academy of Engineering
- National Natural Science Foundation
- China Association for Science and Technology
- Ministry of Education
- Ministry of Science and Technology
- **Foreign Experts Bureau**
- Ministry of Industry and Information Technology
- National Development and Reform Commission

- Ministry of Human Resources and Social Security
- State-owned Assets Supervision and Administration Commission
- People's Bank of China
- . Ministry of Finance
- **United Work Front Department**
- **Communist Youth League of China**
- Ministry of Foreign Affairs
- Ministry of Public Security

Further, arms of foreign governments have also been listed on the OFAC's Sanctions List: e.g., Iran, Libya, North Korea

If you have sourced talent through any of the above agencies or recruitment programs and have questions about managing institutional risk, please connect with our Foreign Influence Compliance team:



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