

**THE ROCKEFELLER UNIVERSITY
FOREIGN TALENT RECRUITMENT PROGRAM POLICY**

POLICY STATEMENT

A foreign talent recruitment program (“FTRP” as further defined below) is an effort by a foreign government or foreign entity to recruit science and technology professionals or students (regardless of their citizenship or national origin). Participation in certain FTRPs, called malign foreign talent recruitment programs (“MFTRP”), is prohibited by federal law due to research security concerns and by this Policy. (See Definitions section below.) Participation in an FTRP may conflict with University policies or procedures.

The Rockefeller University (the “University”) prohibits participation in any MFTRP by any personnel who contributes in a substantive, meaningful way to the scientific development or execution of a research and development project at the University (“Contributing Personnel”), including a Covered Individual.

Contributing Personnel must provide to the University (i) a certification that they are not a party to a MFTRP, and (ii) a disclosure if they are a party to any FTRP.

Contributing Personnel whose project is proposed to be carried out with a federally funded award or who are designated by a federal funding agency to be a covered individual (“Covered Individual”) must provide (i) a certification that they are not a party to any MFTRP, and (ii) a disclosure of any FTRP to such federal funding agency.

Contributing Personnel should carefully review the terms and conditions of an FTRP to confirm that they do not conflict with University policies or procedures or those of existing third-party funders (e.g., Howard Hughes Medical Institute). The University reserves the right to limit or prohibit participation by Contributing Personnel in an FTRP where such participation would create a conflict, including any financial or business conflicts of interest.

PROCESS

1. **DISCLOSURES OF PARTICIPATION IN FTRP**

Contributing Personnel must disclose their participation, regardless of the type or amount of Compensation, in any FTRP to the University and in the case of a Covered Individual, to any applicable federal funding agency.

For disclosure to the University, Contributing Personnel must disclose their participation in an FTRP, within 30 days of beginning such participation, through RAS-COI (<https://RAS.rockefeller.edu>) and upload any applicable documentation (e.g., the contract between the Contributing Personnel and FTRP). University instructions must be followed.

For disclosure to a federal funding agency, a Covered Individual must disclose their participation in an FTRP (a) at the time of submission of any federally funded research grant application, and (b) annually thereafter during the term of any award. University instructions and/or agency procedures or instructions must be followed. These instructions or procedures may include disclosures in a Biographical Sketch Common Form, a Current and Pending (Other) Support Common Form, and any additional form required by the University. The University's Office of Sponsored Programs Research ("OSPA") can provide guidance on the applicable form(s) of disclosure that are required.

2. CERTIFICATION OF NON-PARTICIPATION IN MFTRP

Contributing Personnel must certify to the University and in the case of a Covered Individual, to the federal funding agency¹ that they do not participate in an MFTRP.

For certification to the University, such personnel will periodically certify that they do not participate in an MFTRP when they are (a) required to do so by the University and (b) completing a research certification to update their disclosures in RASCOI (<https://RAS.rockefeller.edu>). University instructions must be followed.

For certification to a federal funding agency, a Covered Individual must certify that they do not participate in an MFTRP (a) at the time of a federally funded research grant application and (b) annually thereafter during the term of any award. University instructions and/or agency procedures or instructions must be followed. These instructions or procedures may include certifications in a Biographical Sketch Common Form, a Current and Pending (Other) Support Common Form, and any additional form required by the University (including in the case of NIH). The University's Office of Sponsored Programs Research ("OSPA") can provide guidance on the applicable form(s) of disclosure that are required.

DEFINITIONS

Contributing Personnel is any individual who contributes in a substantive, meaningful way to the scientific development or execution of a research and development project at the University, including non-University employees such as HHMI employees and consultants, and excluding individuals who work on such projects under a sub-award from a federal research agency.

A **Covered Individual** is a Contributing Personnel whose project is proposed to be carried out with a research and development award from a federal research agency or who is designated by the federal funding agency as a covered individual. A Covered Individual may include persons listed on grants, regardless of whether they are paid or unpaid or are key personnel.

¹ Where a federal funding agency does not require such certification, including because it has not yet issued required certification forms, the certifications must be made to the University on the same schedule as would otherwise apply to disclosures to the federal funding agency under this Policy.

Foreign Talent Recruitment Program (FTRP) is (a) any program, position, or activity that (b) includes Compensation (c) directly provided by a foreign country at any level (national, provincial, or local) or their designee, or an entity based in, funded by, or affiliated with a foreign country, whether or not directly sponsored by the foreign country, (d) to an individual, (e) whether directly or indirectly stated in the arrangement, contract, or other documentation at issue.

Compensation, regardless of the amount, may be in the form of:

- cash;
- in-kind compensation, including research funding, space, staff, and materials;
- promised future compensation;
- complimentary foreign travel;
- things of non de minimis value;
- honorific titles;
- career advancement opportunities; or
- other types of remuneration or consideration.

An FTRP does not include international collaboration activities (unless funded, organized, or managed by an MFTRP) as follows:

1. Making scholarly presentations and publishing written materials regarding scientific information not otherwise controlled under current law;
2. Participating in international conferences or other international exchanges, research projects or programs that involve open and reciprocal exchange of scientific information, and which are aimed at advancing international scientific understanding and not otherwise controlled under current law;
3. Advising a foreign student enrolled at an institution of higher education or writing a recommendation for such a student, at such student's request; and
4. Engaging in the following international activities:
 - a. Activities that are partly sponsored or otherwise supported by the United States such as serving as a government appointee to the board of a joint scientific fund (e.g., the U.S.- Israel Binational Industrial Research and Development Foundation); providing advice to or otherwise participating in international technical organizations, multilateral scientific organizations, and standards setting bodies (e.g., the International Telecommunications Union, Intergovernmental Panel on Climate Change, etc.); participating in a Fulbright Commission program funded in whole or in part by a host country government; or other routine international scientific exchanges and interactions, such as providing invited lectures or participating in international peer review panels;
 - b. Involvement in national or international academies or professional societies that produce publications in the open scientific literature that are not in conflict with the interests of the federal research agency (e.g., membership in the Pontifical Academy of Sciences or The Royal Society);
 - c. Taking a sabbatical, serving as a visiting scholar, or engaging in continuing education activities such as receiving a doctorate or professional certification at an

- institution of higher education (e.g., the University of Oxford, McGill University) that are not in conflict with the interests of the federal research agency;
- d. Receiving awards for research and development which serve to enhance the prestige of the federal research agency (e.g., the Nobel Prize);
- e. Other international activities determined appropriate by the federal research agency head or designee.

Malign Foreign Talent Recruitment Program (MFTRP) involves certain activities with an FTRP, sponsored by a Foreign Country of Concern or Foreign Entity of Concern.

- ***Foreign Countries of Concern***: Foreign Countries of Concern are defined in accordance with federal law (42 U.S.C. § 19237(2)) and, as of April 22, 2025, mean the People’s Republic of China, the Democratic People’s Republic of Korea, the Russian Federation, and the Islamic Republic of Iran.
- ***Foreign Entities of Concern*** include certain programs sponsored by, based in, or affiliated with a Foreign Country of Concern, whether or not directly sponsored by the Foreign Country of Concern. Additionally, the U.S. Department of Defense has compiled a list of Congressionally-designated academic institutions and foreign talent recruitment programs whose programs are considered malign, as referenced in Section (B)(ii) and (B)(iii) below, at:
<https://basicresearch.defense.gov/Portals/61/Documents/Research%20Security/1286%20List.pdf?ver=nEagju7uAK3DCdfMt9yZGg%3D%3D>.
- The lists of Foreign Countries of Concern and Foreign Entities of Concern are subject to change, so please check for updates when you are certifying.

An MFTRP is an FTRP, involving Compensation, by a Foreign Country of Concern or Foreign Entity of Concern, to an individual, in exchange for the individual—

- (i) engaging in the unauthorized transfer of intellectual property, materials, data products, or other nonpublic information owned by a United States entity or developed with a Federal research and development award to the government of a foreign country or an entity based in, funded by, or affiliated with a foreign country, regardless of whether that government or entity provided support for the development of the intellectual property, materials, or data products;
- (ii) being required to recruit trainees or researchers to enroll in such program, position, or activity;
- (iii) establishing a laboratory or company, accepting a faculty position, or undertaking any other employment or appointment in a foreign country or with an entity based in, funded by, or affiliated with a foreign country if such activities are in violation of the standard terms and conditions of a federal research and development award;
- (iv) being unable to terminate the foreign talent recruitment program contract or agreement, except in extraordinary circumstances;

- (v) through funding or effort related to the foreign talent recruitment program, being limited in the capacity to carry out a research and development award or required to engage in work that would result in substantial overlap or duplication with a federal research and development award;
- (vi) being required to apply for and successfully receive funding from the sponsoring foreign government's funding agencies with the sponsoring foreign organization as the recipient; being required to omit acknowledgment of the recipient institution with which the individual is affiliated, or the federal research agency sponsoring the research and development award, contrary to the institutional policies or standard terms and conditions of the federal research and development award;
- (vii) being required to not disclose to the federal research agency or employing institution the participation of such individual in such program, position, or activity; or
- (viii) having a conflict of interest or conflict of commitment contrary to the standard terms and conditions of the federal research and development award.

Approved by the Administrative Working Group on February 17, 2026.