

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 Purdue University Conflict of Interest and Reportable Outside Activities disclosures?

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

Disclosure and approval is required before engaging in any Reportable Outside Activity. Disclosure is also required whenever a new or altered Financial Interest develops. More information can be found in the policies on [Conflicts of Commitment and Reportable Outside Activities](#) and [Individual Financial Conflicts of Interest](#).

What do you need to disclose to funding agencies?

Disclosure to funding agencies is required through the submission of your biosketch and your current and pending/other support document.

- 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 Purdue University (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 and Export Controls 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 [Research Security and Export Controls \(RSEC\) 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. Purdue University implemented these changes and prohibitions by updating the [Interim Research Security Program Policy](#) in January 2024.

How can you request Restricted Party Screenings for your collaborators? Email the [Research Security and Export Controls](#) team to request Restricted Party Screenings for any current or future collaborators including potential appointments, international co-authors, 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 faculty, staff, and students 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 the [Research Security and Export Controls team](#) for general questions about talent programs or other international engagements.