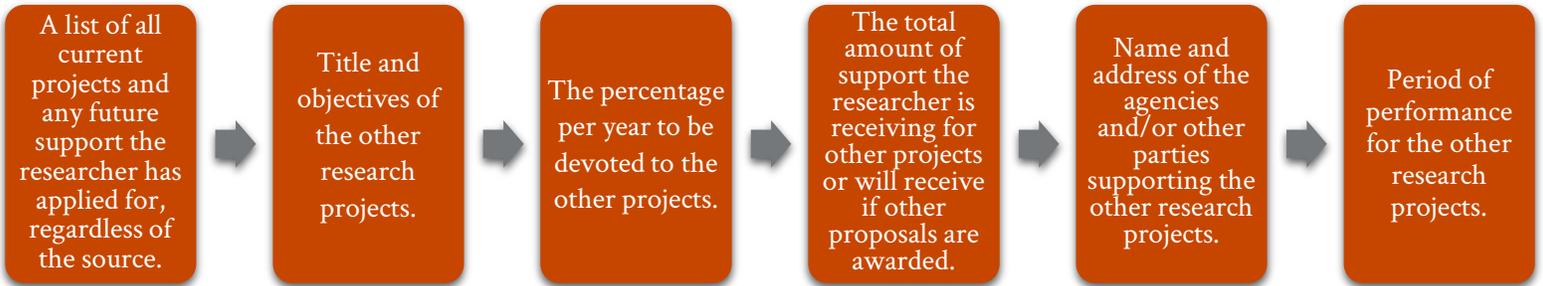


# DoD Foreign Influence Disclosures Guidance for VT Researchers

Virginia Tech remains committed to meeting regulatory compliance in all areas of education and research activities so that stakeholders are responsible stewards of public and private funding. Federal sponsors issue requirements for researchers to disclose their foreign and domestic affiliations, interests, and activities; therefore, researchers must promptly disclose to federal sponsors all relevant activities and information that bear on potential conflicts of interest and commitment. Disclosure remains part of the broader set of researchers' responsibilities to ensure objectivity, honesty, transparency, fairness, accountability, and stewardship. The information below specifies the Department of Defense's (DoD) requirements for foreign influence disclosures.

## What and when do researchers disclose?

In proposals for non-procurement research and research education supported by the Department of Defense (e.g., grants, cooperative agreements), researchers must submit information for all key personnel, whether or not the individuals' efforts under the project are to be funded by DoD.



## How do researchers disclose?

Researchers should disclose foreign interest activities in the pre-award/proposal phase.

- Use [Standard Form \(SF\) 424 Research and Related \(R&R\) OMB number 4040-001 Optional Form Senior/Key Person Profile \(Expanded\)](#).
- Make disclosures part of Biographical Sketch or Current and Pending Support.

## Disclosures to DoD & Virginia Tech

Virginia Tech exercises due diligence to identify foreign components or participation by Senior/Key Personnel in Foreign Government Talent Recruitment Programs and agrees to share such information with the government upon request. Participation in a Foreign Talent Program may preclude participation in DoD-sponsored programs.

To comply with DoD and other government agencies, Virginia Tech maintains internal disclosure procedures. Select each link to learn more.

- [Foreign Talent Programs](#)
- [Conflicts of Interest and Commitment](#)
- [Research Integrity](#)

## Special DARPA Requirements

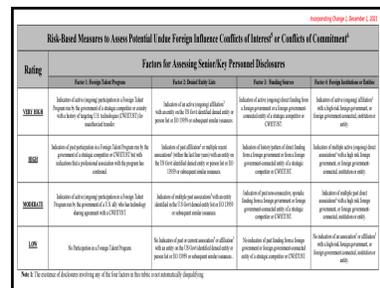
The Defense Advanced Research Projects Agency (DARPA) includes foreign influence disclosure requirements in Broad Agency Announcements (BAAs).

DARPA will evaluate researchers' biographical sketches and other support documentation to evaluate the foreign influence risk across four risk factors:

- 1 Past or present participation with a strategic competitor or countries with a history of targeting U.S. technologies.
- 2 Past or present affiliation with an entity on the U.S. identified-denied-entity-or-person list or similar issuances.
- 3 Past or present direct funding from a strategic competitor or countries with a history of targeting U.S. technologies.
- 4 Past or present affiliation with a high-risk foreign institution.

## Risk Assessment

If during a project subject to BAA conditions, Virginia Tech learns information that affects DARPA risk assessment, VT must notify the Government Contracting Officer or Agreements Officer within five business days.



Rating	Factors for Assessing Senior/Key Personnel Disclosures		
	Factor 1: Strategic Competitor	Factor 2: Denied Entity List	Factor 3: Funding Source
VERY HIGH	Indicates of active ongoing participation in a Strategic Competitor program or project that is identified as a strategic competitor in the DoD 15X list.	Indicates of active ongoing affiliation with an entity on the DoD 15X list identified as a strategic competitor in the DoD 15X list.	Indicates of active ongoing funding from a Strategic Competitor program or project that is identified as a strategic competitor in the DoD 15X list.
HIGH	Indicates of past participation in a Strategic Competitor program or project that is identified as a strategic competitor in the DoD 15X list.	Indicates of past affiliation with an entity on the DoD 15X list identified as a strategic competitor in the DoD 15X list.	Indicates of past funding from a Strategic Competitor program or project that is identified as a strategic competitor in the DoD 15X list.
MEDIUM	Indicates of active ongoing participation in a Strategic Competitor program or project that is identified as a strategic competitor in the DoD 15X list.	Indicates of active ongoing affiliation with an entity on the DoD 15X list identified as a strategic competitor in the DoD 15X list.	Indicates of active ongoing funding from a Strategic Competitor program or project that is identified as a strategic competitor in the DoD 15X list.
LOW	No participation in Strategic Competitor program.	No affiliation with an entity on the DoD 15X list identified as a strategic competitor in the DoD 15X list.	No funding from a Strategic Competitor program or project that is identified as a strategic competitor in the DoD 15X list.

To assist researchers in determining whether or not their foreign interest or activity is subject to DARPA's risk evaluation, DARPA provides more information about what must be disclosed on the [Risk-Based Measures to Assess Potential Undue Foreign Influence Conflicts of Interest or Conflicts of Commitment table](#).

Questions? Contact [foreigninfl@vt.edu](mailto:foreigninfl@vt.edu).

For additional training, the Office of Sponsored Programs (OSP) offers [brief courses on foreign influence disclosures](#).