

# DoE 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 Energy's](#) requirements for foreign influence disclosures.

## What do researchers disclose?

Researchers must disclose team members (including students) participating (paid or unpaid) on a DoE award who are also participating in a **Foreign Government-Sponsored Talent Recruitment Program (FGTRP)** of a **Foreign Country of Risk**.



The list of **Foreign Countries of Risk** change over time; current countries of risk include **China, Russia, Iran, and North Korea**.

Countries of Risk **foreign nationals** are subject to enhanced vetting by DoE and may be restricted from accessing technology or information. A *foreign national* is defined as any person who is not a U.S. citizen by birth or naturalization.

All FGTRP and foreign national personnel participating on a DoE project (regardless of position) must be disclosed to the DoE. Participation on the project includes involvement in contracted research, financial agreements, and/or access to Department of Energy sites, information, or technologies.



### Personnel Defined

- Personnel include faculty, post-docs, students, and visiting scholars.
- Disclosure requirements do not apply to dual citizens if one of the citizenships is the United States, but disclosure requirements do apply if personnel are U.S. lawful permanent residents.
- Virginia Tech may request exemption from the prohibition for post-docs and students.

### Access to DoE Resources



When a principal investigator adds a foreign national to a project, Virginia Tech must submit to DoE multiple documents for DoE review via Kiteworks. The request must include the following:

- Countries of affiliation
- Identification of the DoE physical sites, information, and/or technologies to be accessed
- Justification for the request, including specific activities or involvement
- Proposed start and end-date of the access request (not to exceed four years), a Curriculum Vitae, a Site Security Plan, and other documentation of immigrant or nonimmigrant status, citizenship, identity, and eligibility to be in and work in the U.S.

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### Activities to Disclose

- Compensation of any kind, including cash
- Research funding
- Career advancement opportunities
- Promised future compensation
- Remuneration of any kind, including in-kind compensation
- Honoraria for travel (if a foreign country of risk provides majority of sponsorship)
- Honorary titles associated with work for foreign countries of risk.

### Curriculum Vitae



- Foreign nations working in laboratories must provide a curriculum vitae (CV) that has no lapses for the past 10 years. The CV should include
- Academic background (teaching experience, degrees, research, awards, publications, presentations, and other achievements)
  - All employment activities since the age of 18 years, with all of the individual's science and technology specialties

## How and when do researchers disclose?

### *Pre-Award Phase*

- All involvement in a Foreign Government-Sponsored Talent Recruitment Program (FGTRP) must be identified in Current and Pending Support. Current, Pending, and Other Support may be provided on [SciENCv](#).
- Researchers must read and sign a faculty agreement confirming that they are not participating in an FGTRP.
- On identification of a FGTR participant, Virginia Tech has 30 days to remove the individual or for the participant to terminate the FGTR relationship. If the individual is not removed, DoE may alter or terminate the funding contract.
- In addition to Current and Pending Support, the DoE sponsor may require disclosure of past support (up to 5 years).

### *Post-Award Phase*

- During the life of the award, any previously submitted disclosures by principal investigators or other senior/key personnel must be kept current.
- Individuals added as principal investigator or other senior/key personnel must submit disclosures within 30 days of the change or on the timeline as directed by the DoE sponsor.
- VT must also file reports on a quarterly basis providing the information for each disclosed or otherwise identified activity.

### *Additional Resources*

- [DOE O-486.1: Foreign Government Sponsored or Affiliated Activities](#)
- [DOE O-142.3 Unclassified Foreign National Access Program](#).
- [Department of Energy Current and Pending Disclosure Requirements Financial Assistance Letter](#).

**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.