

## NASA China Prohibitions 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 [NASA's requirements](#) for China prohibitions.

### What is prohibited and allowed?

According to federal law, researchers may be ineligible for funding if their on-going or proposed work involves bilateral activity with the **People's Republic of China (PRC)** or PRC-owned companies or entities. *PRC-owned company* indicates any company owned by the PRC or any company incorporated under the laws of the PRC. Chinese universities and other similar institutions are considered to be incorporated under the laws of the PRC; therefore, the funding restrictions apply to grants and cooperative agreements that include bilateral participation, collaboration, or coordination with Chinese universities. See [NASA funding FAQs](#) for more information.

#### Prohibited participants

- PRC students and student interns from PRC institutions of higher education on a J-1 visa
- Visiting scholars from PRC institutions of higher education
- Adjunct faculty from PRC institutions of higher education
- VT faculty, staff, post doctoral candidates, and students (regardless of nationality) having bilateral participation, collaboration, or coordination with businesses and entities of the PRC. Note: NASA considers all Chinese institutions of higher learning to be entities of the PRC.

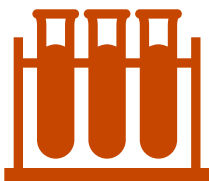


#### Allowed participants

- Students with PRC citizenship in the USA on an F-1 visa
- Post-doctoral candidates and research faculty with PRC citizenship in the US on an H1-B visa
- Faculty, staff, and students with PRC citizenship who are also United States Resident Aliens

#### Prohibited bilateral activities

- Attending conferences in PRC
- Publishing papers that include authors from only the USA and PRC
- Data sharing agreements with PRC organizations
- Reviewing manuscripts from PRC journals



#### Allowed Activities

- General scientific discussions with PRC researchers
- Participating in research funded by non-NASA sponsors that involve scientists affiliated with PRC institutions
- Attending multilateral, widely-attended conferences in PRC
- Publishing papers that include authors from USA, PRC, and other countries
- Reviewing journal manuscripts not from PRC, even if they include authors from PRC
- Using PRC data that is publicly available

### Pre-Award Proposal Disclosure

When submitting a proposal, VT is required to make the following assertion in the contract:

*"By submission of its proposal, the proposer represents that the proposer is not China or a Chinese-owned company, and that the proposer will not participate, collaborate, or coordinate bilaterally with China or any Chinese-owned company, at the prime recipient level or at any subrecipient level, whether the bilateral involvement is funded or performed under a no-exchange of funds arrangement."*

### Foreign Influence Disclosure Courses

The Office of Sponsored Programs (OSP) offers a [series of brief training courses](#) on *what, how, and when* to disclose to each federal sponsor. The courses range 15-20 minutes and include a brief knowledge check at the end of each course.

When proposing sponsored research with federal sponsors, researchers and their research team are highly encouraged to take the sponsor-specific course before submitting a proposal. Visit [NASA China Prohibitions](#) course to get started.