

March 19, 2024



Dear JHU investigators,

I am writing to share an update on research security and the University's obligations under federal law.

As required by federal research funders, the University prohibits its investigators from participating in "malign foreign talent recruitment programs." Foreign talent recruitment programs are efforts directly organized, managed, and/or funded by a foreign government or institution to recruit students and professionals who have a primary affiliation with a U.S. academic institution.

"Malign foreign talent recruitment programs" can take two forms.

The first are programs organized, managed, or funded (by cash or in-kind compensation) by nations (or government entities based in those nations) identified by the U.S. Department of State as "countries of concern." These countries are currently Burma (Myanmar), the People's Republic of China, Cuba, Eritrea, Iran, the Democratic People's Republic of Korea, Pakistan, Russia, Saudi Arabia, Tajikistan, and Turkmenistan.

The second are programs organized and managed in such a way that participation requires violation of federal rules related to intellectual property ownership or disclosure of outside activities to domestic institutions.

Investigators must disclose to their grants and contracts officer any participation in a foreign talent recruitment program, whether or not the investigator believes the program to be malign. Upon disclosure,

March 19, 2024

the University will assess whether participation is prohibited under federal rules.

Federal funders continue to revise their expectations of extramural investigators, and the University recognizes that these changes may be confusing to faculty.

If you would like to have a representative from the Office of General Counsel and compliance leadership join an upcoming department or division meeting, please contact Stephanie Shea, Chief Compliance Officer and Senior Associate General Counsel, at sshea@jhu.edu.

More information and written guidance about federal requirements are available on the Office of the Provost website at: <https://jhura.jhu.edu/compliance-2/foreign-engagement/>.

Sincerely,

Denis Wirtz
Vice Provost for Research