

At George Mason, investigators must disclose any participation in a *foreign talent recruitment program* (FTRP) as they do with all outside activities. Importantly, federal regulations prohibit investigators from receiving federal funds if they participate in a *malign* foreign talent recruitment program (MFTRP). **For NSF proposals submitted on or after May 20, you must certify that you are not participating in any MFTRP.**

### Foreign Talent Recruitment Program - Disclosure

Participation in a FTRP involves any activity that includes compensation or promised compensation (e.g., cash, complimentary travel, honorific titles) provided by a foreign country or an entity affiliated with a foreign country.

#### Are there foreign-related activities that are not FTRPs?

Yes. As long as they are not associated with an MFTRP, the following are not considered foreign talent recruitment programs:

- Routine scientific exchanges (e.g., invited lectures, peer review panels, international conferences)
- Publishing written materials regarding scientific information
- Research that involves the open exchange of information aimed at advancing international scientific understanding
- Advising and writing recommendations for foreign students enrolled in higher education
- Activities sponsored by the United States (e.g., serving as a government appointee to a joint scientific fund)
- Participating in international technical, multilateral scientific, and standards setting organizations (e.g., the International Telecommunications Union)
- Participating in a Fulbright Commission program
- National or international academies or professional societies that produce publications in the open scientific literature
- Taking a sabbatical, serving as a visiting scholar, or engaging in continuing education activities such as receiving a doctorate or professional certification at an institution of higher education
- Receiving awards that enhance the prestige of your sponsoring federal research agency (e.g., Nobel Prize)
- Other international activities approved by the sponsoring federal research agency

#### Who has to disclose this info?

For NSF-funded projects, anyone who is responsible for the design, conduct, or reporting of the research is required to disclose. This disclosure requirement aligns with the category of all Investigators in George Mason policies 4001 and 4021. [1,2]

#### Where (and how) do you disclose this info?

You disclose your participation in FTRP in your RAMP COI Disclosure Profile.

### Malign Foreign Talent Recruitment Program - Certification

#### What is an MFTRP?

A FTRP is considered malign when two conditions are met:

- (1) It is associated with a *country of concern*:      (2) It requires an individual:
- People's Republic of China (including Hong Kong & Macau)
  - Democratic People's Republic of Korea
  - Russian Federation
  - Islamic Republic of Iran
  - engage in the unauthorized transfer of IP, materials, data, etc.; or
  - recruit others to join the activity; or
  - establish a laboratory or company; or
  - accept a position or appointment with a foreign country or entity; or
  - not terminate a contract or agreement; or
  - limit their capacity to carry out research or work; or
  - apply for/receive funding from foreign funding agencies; or

- omit acknowledging George Mason or the sponsoring federal agency; or
- not disclose participating in the activity; or
- have a conflict of interest or conflict of commitment.

To see the full definition of what constitutes an MFTRP check here: [White House Definition of MFTRP](#) [3]

To see a list of known MFTRPs check here: [Countering Unwanted Influence in Department Funded Research](#) [4]

### What are the risks associated with MFTRP?

MFTRP pose risks to individual investigators, as well as risks to George Mason and threats to U.S. national and economic security, including:

- Disqualification or loss of federal funding.
- Theft of intellectual property.
- Conflicts of commitment violations.

### When (and where) do you have to certify?

Investigators will certify that they are not participating in a MFTRP when submitting a proposal, upon award, and annually thereafter. For NSF proposals, individuals must certify that they are not participating in a MFTRP on their Biosketch and Current & Pending Support forms. Check with pre-award personnel to learn more about when in the proposal preparation process this certification will need to happen.

## More information

### Who do I contact at George Mason with questions?

Joel Thurston, Director of Research Integrity  
Office of Research Integrity and Assurance, Research Hall, Room 134  
4400 University Drive, MSN 6D5, Fairfax, Virginia 22030  
Phone: 703-993-1168 | Email: [jthurst4@gmu.edu](mailto:jthurst4@gmu.edu) | Web: <https://oria.gmu.edu/>

### Where can I find additional information on relevant university and federal policies?

[1] George Mason University Policy 4001: Conflict of Interest - <https://universitypolicy.gmu.edu/policies/financial-conflicts-of-interest-in-university-contracts-with-businesses-under-virginia-law/>

[2] George Mason University Policy 4021: Outside Professional Activities and Conflict of Commitment - <https://universitypolicy.gmu.edu/policies/outside-professional-activities-and-conflict-of-committment/>

[3] Office of Science and Technology Policy Memorandum on Guidelines for Federal Research Agencies Regarding Foreign Talent Recruitment Programs - <https://www.whitehouse.gov/wp-content/uploads/2024/02/OSTP-Foreign-Talent-Recruitment-Program-Guidelines.pdf>

[4] Under Secretary of Defense Memorandum on Policy for Risk-Based Security Reviews of Fundamental Research - <https://media.defense.gov/2023/Jun/29/2003251160/-1/-1/1/COUNTERING-UNWANTED-INFLUENCE-IN-DEPARTMENT-FUNDED-RESEARCH-AT-INSTITUTIONS-OF-HIGHER-EDUCATION.PDF>