Is My Talent Program Malign?

1. Are you being paid or receiving any form of compensation (i.e. recognition, awards, money, funding, reimbursement, land, etc.) from a country other than the US (including the promise of future compensation of any kind)?

2. Is the program from China, Iran, Russia, or North Korea?

3. Contact the Export Controls & International Compliance team if you are asked to engage in or are participating in any of the following activities:

   • Recruit others (trainees, researchers, speakers, etc.) to participate in a talent program with a foreign entity.
   • Hold a position, an appointment, a laboratory, or a company in a foreign country
   • Engage in a contract/agreement where termination is not an option or is difficult
   • Unauthorized transfer of (IP) intellectual property, materials, data, or other nonpublic information
   • Engage in work for or in another country that overlaps with U.S. Federal dollars
   • Apply for or receive funding from a sponsoring foreign entity where you did NOT engage Sponsored Research
   • Omit a recipient affiliation, or being told/required to make omissions
   • Conceal program participation in any way

*Simply holding a position or appointment does not constitute a “malign” talent program but if it’s with a country of concern it maybe problematic

Engagement in a malign foreign talent program from a country of concern precludes an individual from applying for or receiving U.S. federal dollars.

Countries of concern are currently defined by the U.S. federal government.

China  Iran  Russia  North Korea

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