Participation in Malign Foreign Talent Recruitment Program Initial Attestation

May 20, 2024

Dear Colleagues,

Action Required

As a follow up to my March 27, 2024 email you are now receiving this notification to log into the Research Administration Portal to attest either that [I am not], [I am], or [I am unsure if I am] currently a party to a malign foreign talent recruitment program (MFTRP)* as soon as possible but no later than July 1, 2024. If you select “I am” or “I am unsure if I am,” a school representative will contact you with guidance and next steps.

Background

On August 9, 2022, the CHIPS and Science Act (Public Law 117-167) was signed into law which requires Covered Individuals (e.g., PI, Co-PIs, investigators, key or senior personnel) to meet the initial and annual certification requirements regarding their non-participation in a MFTRP.

The Harvard University Foreign Talent Recruitment Program Policy is effective May 20, 2024, for National Science Foundation awards and August 9, 2024, for all other Federally and non-Federally funded awards. Additional information is available in FAQs.

If you have any questions about this Policy, its implementation, or the required attestation, please refer to the Foreign Talent Recruitment Program section of the Office of Vice Provost for Research (OVPR) website for contact information, or contact Russell Ashenden, Senior Research Compliance Officer, OVPR, at russiahlhashenden@harvard.edu, or myself at ara_tahmassian@harvard.edu.

Best regards,

Ara Tahmassian
University Chief Compliance Officer
Harvard University

* A MFTRP is sponsored by or based in a foreign country of concern (FCOC) and offers cash or in-kind compensation in exchange for activities such as unauthorized transfer of intellectual property, materials, data, or other nonpublic information; recruiting or training other talent program members circumventing merit based processes; establishing a laboratory or company or accepting a faculty position or other employment in the FCOC without allowing disclosure to Harvard or sponsors; attributing awards, patents, publications, and projects to the foreign institution, omitting Harvard or U.S. funding agency; or applying for and receiving funding from the foreign institution’s government without disclosure to and approval from Harvard.