

From: DOF Regular Faculty (non-visiting, non-summer) <dof-faculty-reg@Princeton.EDU> **On Behalf Of**
Office of the Dean of the Faculty
Sent: Thursday, October 26, 2023 3:21 PM
To: DOF-FACULTY-REG email list <dof-faculty-reg@princeton.edu>
Subject: New federal funding restrictions in 2024



Dear Colleagues,

We are writing to inform you of new federal rules regarding [malign foreign government talent recruitment programs \(MFGTRPs\)](#) as defined in the CHIPS and Science Act of 2022. Starting in 2024:

- University researchers who participate in MFGTRPs **will not be eligible for federal research funding.**
- Federal agencies will require University researchers to **certify personally that they are not members of a MFGTRP** in the proposal submission and annually thereafter throughout the duration of the award.

More details are at the end of this message, including information about specific agencies and how you can get advice on complying with the changing policy landscape. We also remind you to follow these standard compliance practices:

1. Fully disclose throughout the year your outside engagements (domestic and foreign) to the University, e.g., in the COI system, and to your research funders, e.g., in any biosketches and current and pending/other support materials;
2. Exercise due diligence when accepting appointments, or commitments of financial or nonfinancial resources from foreign institutions and particularly in [foreign countries of concern](#) (defined by the law to include the People's Republic of China, Russia, North Korea, and Iran), as these appointments or commitments may meet the CHIPS Act definition of MFGTRPs;
3. Review [mandatory training materials](#) developed for faculty on disclosure integrity, and review [guidance from OGC](#) regarding your current or planned outside agreements.

Princeton remains steadfast in its commitment to supporting international collaborations; an open, diverse, and welcoming environment; and the numerous beneficial aspects of faculty engaging in outside activities, domestic and international. This message, along with previous ODFR/ODOF [communications](#) regarding research security, aims to protect Princeton researchers' ability to propose and manage federal funding for research and help them navigate international collaborations effectively and safely.

Thank you for your attention to this important matter.

Best wishes,

Peter Schiffer
Dean for Research

Professor of Physics

Gene Jarrett
Dean of the Faculty
William S. Tod Professor of English

How to get additional help on this topic

If you have any questions about how to address the issues in this memo, please contact John Jenkins, Associate Director of Export Control, who is leading the University's research security efforts, at researchsec@princeton.edu or 609-258-3819.

In addition, please note, the University has established a program to cover up to two (2) hours of consultation with an outside attorney for principal investigators (PIs or co-PIs) who wish to receive personal legal advice on their foreign appointments, engagements, contracts, or activities – whether existing or contemplated. Additional details on that program, including a list of attorneys, can be found [here](#).

The definition of a MFGTRP and agency-specific information

The CHIPS and Science Act of 2022 defines a MFGTRP and instructs federal agencies to prohibit personnel on federally-sponsored projects if they are participating in MFGTRPs. It is anticipated that all federal grantmaking agencies will implement this CHIPS Act provision by **August 9, 2024**.

At present, there is a lack of uniformity among agencies. For example:

1. The National Science Foundation will implement the MFGTRP prohibition on 1/1/24.
2. The Department of Defense published a policy in summer 2023 that details the process it will use to assess award applicants' connections to foreign entities, including their participation in malign FGTRPs. Some parts of DOD, such as the Defense Advanced Research Projects Agency and the Army Research Office, have already implemented the above type of review procedure.
3. The Department of Energy has restricted talent program participation under research contracts and subcontracts since 2019 via DoE Order 486.1A (updated 2020).

While some foreign government talent recruitment programs may be legitimate and beneficial, others may not align with Princeton's academic values or U.S. national interests, may represent conflicts of commitment or conflicts of interest for researchers, or may be inconsistent with University policy.