



## Principles and Values to Guide Actions Relevant to Foreign Government Interference in University Research

America's research universities are the envy of the world, underpinning both our economic prosperity and our national security. Given their significance to the nation, universities share and are actively responding to concerns from across the federal government regarding foreign government interference in university research. Such interference can take many forms, including misappropriation of research results and intellectual property, dishonest representations of researchers' personal interests, suborning of the peer review process, non-reciprocal sharing of information and resources in collaborative relationships, and conflicting commitments of researchers to foreign entities. The members of the Association of American Universities (AAU) and the Association of Public and Land-Grant Universities (APLU) are working closely with the federal government, including both science and security agencies, in addressing the issues associated with such foreign government interference. The universities are committed to collaboratively responding to threats posed by foreign government interference, and they have compiled and shared many of the [effective practices](#) that have been implemented.

At the same time as protecting university research from such foreign interference, universities must also protect the strength and vitality of the research enterprise. University research drives economic growth, it underlies modern health care and the strength of American industries, and it is essential to educating the workforce that powers both government and industry. Universities themselves are often key employers that drive a state or region's economic activity. Our research universities also attract the very best talent from around the world, which is key to ensuring the future of our innovation economy. The combination of all these contributions places the health and vitality of university research squarely at the heart of our sustained prosperity and national security. Actions taken in response to foreign government interference therefore must consider the essential character of the university research enterprise that makes it so valuable to the nation and humanity. This character in turn depends critically on upholding scientific integrity and honesty among researchers and the free flow of fundamental knowledge and talent as core tenets of modern research.

This document lists and summarizes fundamental principles and values of the AAU and APLU member institutions that are relevant to their approach to foreign government interference. The goal of articulating these principles and values is to foster protection against foreign government interference without damaging the contributions to national and economic security that the United States derives from the university research enterprise. The document is divided into three sections:

- 1. Common Values** - This section outlines common values of AAU and APLU universities relevant to foreign government interference in research. This outline can serve as a guide for the formulation of new initiatives and policies, including new partnerships with institutions in other nations that may not share all the same values. The list is not intended to be comprehensive, and each of the values should be considered in the context of specific situations.
- 2. Principles for Government Actions in Protecting and Ensuring the Future of the U.S. University Research Enterprise** - This section outlines broad principles that should guide

government actions in countering foreign government interference. The principles should be considered for any new legislation or policies in this arena.

- 3. Principles for Universities in Responding to Foreign Government Interference** - This section outlines broad principles for actions by universities themselves that can help counter the effects of foreign government interference and maintain and enhance the strength of the U.S. university research enterprise.

## 1. Common Values

The AAU and APLU Universities share common high-level values associated with their education, research, and economic development activities. While they may be framed differently by each institution, common elements relevant to foreign government interference include:

- **Academic Freedom** - Academic freedom of researchers to both pursue their scholarly interests and disseminate their findings, with emphasis on enabling the free participation of all researchers.
- **Free Expression** - Protection of free speech and the open exchange of ideas that form the cornerstone of intellectual discourse and the engine of impactful discovery.
- **Inclusion and Diversity** - Active promotion of principles of access, diversity, and non-discrimination in all research and creative activities. This encompasses both the proactive inclusion, support and encouragement of diverse researchers and viewpoints, as well as the consideration of the impacts of research on diverse groups in society.
- **National Interest** - Support of both national security interests and the economic security interests of the United States. This support is through the active pursuit of excellence in education, research and innovation, as well as the stewardship and protection of investments in the university enterprise.
- **Transparency** - Fully transparent and reciprocal sharing of the methods, data, and outcomes of research, while maintaining confidentiality when appropriate (e.g., during peer review or evaluation of intellectual property, or when working with controlled or classified information or personal health information).
- **Integrity** - Honest representations and actions in all aspects of research activities including strict adherence to the principles of research integrity regarding fabrication, falsification, and plagiarism. Integrity also includes respecting the rights of those who develop and own intellectual property of all sorts, and the open declaration of all sources of academic support and possible conflicts of interest, financial and otherwise, that could impact research outcomes.
- **Zero Tolerance for Harassment and Coercion** - Freedom of all members of the university ecosystem from harassment, bullying, or threats to their personal or family safety, whether by an individual, a group, an institution, or a government.
- **Collaboration** - Active pursuit of research goals with the best available partners who share the same goals and values. Many of the most challenging research topics require engagement with researchers from around the globe who bring a diversity of talents, capabilities, and perspectives.

## 2. Principles for Government Actions in Protecting and Ensuring the Future of the University Research Enterprise

The following principles are intended as broad guidance for how U.S. government actions and legislation or policies should counter foreign government interference while protecting and fostering the university research enterprise. These principles presume strong and sustained government funding of research, on which the health of the university research enterprise depends.

- **Limit restrictions on research** - Government-funded research should normally be categorized as “fundamental research”, as defined in [National Security Decision Directive 189](#), for which there should be no restrictions on dissemination of research results or on participation by foreign nationals. There are natural exceptions, e.g., for national security, protection of research participants, and protection of proprietary commercial results.
- **Protect the integrity of the research enterprise** - Government agencies should partner with universities to develop and implement clear and consistent standards for all aspects of integrity for individual researchers. These standards should be implemented with a high degree of consistency and clarity across all federal funding agencies. Integrity in this context includes the appropriate attribution of intellectual ownership of research results and intellectual property, as well as other legal, regulatory, and ethical expectations.
- **Encourage sharing of research results** - The government should continue to advocate for the open and reciprocal sharing of fundamental research advances, with the expectation that the integrity of ownership and attribution will be maintained. Specific agency mandates for open data and dissemination should be accompanied by appropriate financial and other resources.
- **Provide clear guidance for any controls on information** - Government controls on the distribution and accessibility of research information should be narrowly defined and focused on specific technologies that are essential to national security. Such controls should be consistent across government agencies and not subject to the interpretation of individual sponsors or program managers. They should not be applied to commercial technologies that are widely available outside the United States nor should they be applied to broad technology areas. Before adding any restrictions over new emerging and foundational technologies, the government should consider unintended consequences that could impede the creation of new knowledge that is in the long-term best interest of the United States.
- **Enable the recruitment and retention of talent** - The government should enable and encourage the recruitment and retention of new talent in the research ecosystem. This includes both international talent and the full range of domestic talent, i.e., members of groups traditionally underrepresented in STEM fields. The government should provide an efficient process through which international students and scholars can be recruited after sufficient vetting for security or other concerns. Government policies should also enable and encourage talented international trainees to pursue their careers in the United States, rather than seeking opportunities abroad.
- **Support the establishment and maintenance of international collaborations** - The government should minimize administrative barriers to the establishment of both informal collaborations and formal agreements with international researchers, assuming such arrangements embody a transparent research partnership that maintains the integrity of the research enterprise and embodies a reciprocal sharing of knowledge and research findings. The government should also offer accessible options for universities to explore possible governmental concerns regarding

international corporations and research institutions with whom institutional partnerships may be developed.

- **Build transparency regarding foreign interference** - Government agencies should keep universities informed regarding the evolving scope and nature of foreign talent recruitment plans and foreign government interference in the U.S. research enterprise. Federal government agencies should identify and communicate specific threats of foreign government interference, since universities typically do not have the capacity or expertise for such identification.

### 3. Principles for Universities in Responding to Foreign Government Interference

The following principles can guide action by universities in developing both policies and practices in response to possible foreign government interference.

- **Protection of Institutional Values** - Each university should employ review processes to ensure that formal institutional engagements with foreign governments and other foreign entities are consistent with the values of the university and are not leading to an abrogation of those values either explicitly or implicitly. Universities should develop clear criteria through which the risks of such engagements can be assessed. Universities should also develop relationships with the appropriate federal agencies to allow for confidential and voluntary consultation regarding potentially problematic engagements.
- **Protection of the Status of Fundamental Research** - Universities should work with the government to ensure that, to the maximum extent possible, research is categorized as “fundamental research”, for which there should be no restrictions on dissemination of research results or on participation by foreign nationals.
- **Transparency and Accountability Regarding External Interests and Activities** - Universities should require all employees involved with research to fully disclose all external interests and activities relevant to conflicts of interest and conflicts of commitment, so that sponsors and the universities themselves can appropriately benefit from the research results. External interests and activities may include, for example, personal financial incentives from external organizations (e.g., via consulting arrangements) or affiliation with organizations whose interests do not align with the university’s (e.g., serving as a member of a foreign military). Universities should have policies and structures to both evaluate and manage activities in the context of such conflicts.
- **Protection of Information and materials** - Universities have the responsibility to maintain appropriate physical and cyber security measures to protect all non-public research information and research materials. They have special responsibilities when they work with research and information that is classified, subject to export controls, or protected as “controlled but unclassified information” or “dual use research of concern.” They should fulfill all these responsibilities through clear and enforceable policies and procedures consistent with government requirements. Part of this responsibility includes appropriate training for researchers regarding the protection of information, both at their universities and when on travel.
- **Informing Researchers Regarding Risks** - Universities have the responsibility to inform researchers within their communities of the risks of foreign government interference and the researchers’ own individual responsibilities. Universities should also inform researchers regarding the principles and values underlying the concerns relevant to foreign government interference, as well as the mechanisms and processes available to protect themselves, their collaborators, and their research results.
- **Engagement with International Talent** - Universities should actively recruit the best intellects to their ranks as students, staff, and faculty, regardless of national origin. A welcoming and inclusive environment should be fostered to support such recruitment, with particular attention to fighting discrimination based on race or national origin. Universities should develop policies and the infrastructure through which to host international scholars and students and engage in

international collaborations while appropriately regulating access to computer networks, laboratories, and other facilities relevant to research activities that require confidentiality, e.g., for national security purposes.

- **Support for Commercialization and the Protection of IP** - Universities should proactively support and enable the commercialization of intellectual property (IP) that is developed by faculty and other researchers. University ownership of such IP is a well-established principle of the U.S. research enterprise that should be upheld because it incentivizes the personal, institutional, and societal benefits accrued by such commercialization. Ownership should be protected against loss or theft through international engagements.
- **Access to Research Results** - Universities should actively support the open sharing of research results and data, with appropriate exceptions, e.g., for national security, protection of research participants, and protection of proprietary commercial results.
- **Continued Engagement and Investment in Research** - Universities should continue to engage in leading research and to invest their own resources in the research enterprise. Such engagement and investment will incentivize U.S. researchers to contribute to our research enterprise and will allow the United States to attract and retain the best global talent.
- **Engagement with Government on Standards for the Integrity of the Research Enterprise** - Universities should work with U.S. government agencies to provide clear and government-wide consistent standards for all aspects of integrity for individual researchers that will protect the overall integrity of the research enterprise. Universities should also work with government agencies to gain and maintain a common understanding of the scope and nature of foreign talent recruitment plans and foreign government interference in the research enterprise.