



Dear Colleagues,

With increasing guidance from federal sponsors on collaborations with foreign institutions and entities, there have been more frequent inquiries to sponsored research staff regarding potential collaboration opportunities between Harvard University researchers and students, visiting scholars or appointees from institutions that have been placed on a federal restricted party list. These opportunities have included paid or unpaid appointments, internships, visitors, and joint research projects from the respective entities to Harvard laboratories. We wanted to provide you with updated information and guidance on these collaborations.

U.S. [restricted party lists](#) include certain foreign persons, businesses, research institutions, and government and private organizations that are subject to specific license requirements for collaboration with them, or the export, reexport and/or transfer (in-country) of specified items. Often, there is a "presumption of denial" for any license application to engage such individuals or entities.

Other lists such as the Department of Defense (DoD) NDAA [Section 1286](#) and [Section 1260H](#) lists, identify entities that the DoD has identified as posing elevated risks which will be considered during assessment of research funding.

In response to these inquiries, we have developed a guidance document "[Appointments with Restricted Party Affiliations: Procedures for Identifying and Managing Risk](#)," which provides detailed information on steps to be taken in advance of initiating a research appointment, internship, visit, or other institutional research relationship with an individual employed or otherwise affiliated with an entity that is on a U.S. Government Restricted Party list. Your School Export Control Administrator (ECA) will assist in identifying such entities. The determination of risk will be based on U.S. Government Restricted Party List screening, information provided to the University by a federal agency, and/or information in the public domain.

Please review the guidance document for additional information and questions regarding this guidance should be directed to your School ECA or [Melissa J. Lopes](#), Senior Research Compliance Officer, OVPR, or [Russell Ashenden](#), Senior Research Compliance Officer, OVPR.

Regards,

John H. Shaw
University Vice Provost for Research
