



Foreign Research Collaborations Disclosure – A Working Guide for CU Boulder Researchers

Why It Matters

- **Collaboration is encouraged** – CU Boulder actively supports foreign research partnerships as core to its mission and global impact.
- **Risk-based review** – each collaboration is weighed **in proportion to the actual risk** it presents, not treated as inherently suspect. Note: for NASA (current guidance based on interpretation of Wolf Amendment) and NSF (once its restricted-entity prohibition takes effect), certain collaborations are categorically barred regardless of assessed risk.
- **Federal guidance drives the process** – assessments follow current **U.S. government** direction and expectations.

The Regulatory Context

- **Chips and Science Act (2024)** – prohibits participation in **malign foreign talent recruitment programs**.
- **NSPM-33 Presidential Memorandum** – sets research-security requirements, including disclosure of **foreign affiliations, resources, and conflicts of interest**.
- **NASA-specific restrictions** – bar bilateral or coordinated activities with the **Chinese government, universities, or Chinese-owned companies**.
- **NIH foreign component policy** – requires disclosure and **prior approval before proceeding** for most foreign co-authorship and other significant scientific activity performed outside the U.S., even when no NIH funds are expended abroad.
- **NSF-specific restrictions** – a **forthcoming** prohibition (announced July 8, 2026; not yet in effect; expected Fiscal Year 2027, approximately October 1, 2026) on collaboration with entities on 12 U.S. restricted-party lists, requiring certification by senior/key personnel and the Authorized Organizational Representative at proposal submission.

What Counts as a Collaboration

- **Research design:** if a covered-entity researcher helps design the study, disclose it, whether or not they are named as an author.
- **Data collection or analysis:** if a covered-entity researcher collects or analyzes data for the project, disclose it, whether or not they are credited.
- **Manuscript work (writing or editing):** if a covered-entity researcher writes or edits any part of the manuscript, disclose it, whether or not their contribution is extensive.
- **Pre-publication sharing of results:** sharing a draft, dataset, or preliminary results with a covered-entity researcher before submission is a collaboration, disclose it even if that person never becomes a co-author.
- **Joint equipment development:** developing instruments, code, or methods together with a covered-entity researcher is a collaboration, disclose it whether or not it is mentioned in the paper.
- **Travel in support of any of the above:** travel undertaken to carry out any of these activities with a covered-entity researcher is part of the collaboration, disclose it.



The Two Disclosure Questions (in the DEPA)

- **Question 1 – Geography:** Have you collaborated (or intended to) with anyone, including **former post-docs**, in a country of concern? The list names **China, Cuba, Hong Kong, Iran, Myanmar, North Korea, Russia, occupied regions of Ukraine (e.g. Crimea), Syria, and Venezuela**? A "yes" requires documenting **each** collaboration (entity and collaborator name).
- **Question 2 – Value received:** Have you received **monetary** (payments, funding, stipends, honoraria) or **non-monetary** value (free space/equipment, restricted-data access, support services, visiting personnel) from a foreign entity?

The Manuscript-Only Exception

- **Generally exempt:** if your entire contribution is **only writing or revising** a manuscript.
- **Still disclose when:** the work involves an **entity of concern**, or when you work **directly with all co-authors** on multi-author reviews, meta-analyses, or special-topic overviews.
- **Scope of this exception:** this carveout applies to the DEPA/COI disclosure question only. It does not exempt a NASA or NIH-funded researcher from separate agency-level analysis, both NASA's Wolf Amendment and NIH's foreign component policy can treat writing-only co-authorship with a covered entity as the relevant trigger, regardless of disclosure status here.

Bottom Line

- **The default rule is "when in doubt, disclose".**
- **Support is available** – questions go to the **Office of Conflicts of Interest & Commitment** coi@colorado.edu.
- **Beyond routine disclosure:** for a suspected past compliance gap, or a direct inquiry from a funding agency, an Inspector General, or DOJ, contact RIO Research Security and the Office of General Counsel immediately, do not respond directly, and do not wait for the next annual DEPA cycle.