

# **Carnegie Mellon University**

## **Carnegie Mellon University President's Committee on International Engagements**

### **Final Report**

First session: 2019  
Second session: 2021

**January 15, 2020 (first complete draft)**  
**June 30, 2021 (revised and final)**

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## Executive Summary

Carnegie Mellon University (CMU) is a renowned and important global research university with a long tradition of engaging international partners in the pursuit of its core education and research missions. It is also a center for fundamental research, some of which is critical to the economic and national security of the United States. As such, we must constantly ensure that we are balancing our commitments to pursue open research and provide education for the good of society with our need to protect our intellectual contributions and national security from malevolent influence. Recognizing this balance requires strategic policies and procedures for international engagements.

Cognizant of potential regulatory and procedural changes from our funding sources, and of the ongoing public debate, in the spring of 2019 CMU President Farnam Jahanian chartered a Committee on International Engagements. The committee was chartered to study the issues as they relate to CMU and make recommendations to ensure our policies, processes, and training allow us to best pursue our mission and meet our obligations. This report is the outcome of the Committee's work (including a year-plus hiatus due to the COVID-19 pandemic).

The report reaffirms our core principles regarding CMU's commitments to academic freedom, our global community, and to responsible management of the risks inherent in our international engagements, as well as our commitments to compliance with applicable laws and transparent processes to enable our work.

The report makes a total of sixteen specific recommendations in four areas:

**Policies and procedures** covering the review and approval processes that must be followed to permit international education, gift and sponsored research engagements, as well as the disclosure requirements to which individuals must comply.

**Training and education** addressing the resources the university should supply and the training individuals must complete to ensure compliance with laws, government sponsor requirements, and protection of intellectual property.

**Communications** covering what information should be readily available to educate the community, to maintain awareness of any changes in the issues and environment surrounding international engagements, and to support the effective roll out of the recommendations contained in this report.

**Going forward** addressing how university leadership should stay engaged in the national discussion and advocacy on the issues addressed herein, and how the Committee should continue its work in support of CMU global engagements.

## Background

Carnegie Mellon University (CMU), as one of the world's great research universities, has at its core two fundamental missions:

1. to educate the next generation of students who will serve as the world's creative, innovative, entrepreneurial, and informed leaders; and
2. to pursue fundamental research and technology development to help create the positive future that society needs.

From the University's earliest days, our pursuit of these two missions has been enhanced by engagement in the global community, welcoming faculty and students and collaborating with partners around the world.

CMU researchers have always been at the forefront of scientific and technological developments, transforming society through work that has been funded by a wide array of government, private, and foundation support. Increasingly, as nations around the world recognize the value of investing in fundamental research and the profound capabilities of CMU researchers, that sponsorship—and the philanthropy attendant with it—has increasingly included private sources from outside the United States.

The work pursued at CMU has had profound impacts on civil society and the University also has a long and productive history working in research areas that directly benefit national security or, increasingly, lead to dual-use capabilities that contribute to both civil society and national security. These areas of research place important obligations on the University and its people to ensure proper protection of valuable national assets. CMU has done this effectively as part of its history and continues to do so today.

Understanding the history of the international research landscape provides context important for navigating the research environment today. At the height of the Cold War, concerns about appropriation of critical technologies by the Soviet Union led to the creation of the security regimes still in place across the country. There was a clear recognition at that point in history of the importance of both academic freedom and open international collaboration in the pursuit of fundamental research. An overly restrictive environment was seen as a too-high price to pay to protect what at the time was considered a small number of critical technology areas.

The balance that evolved from this landscape was instantiated and memorialized in a foundational document, the 1985 National Security Decision Directive 189 (NSDD-189) which stated unequivocally, "The strength of American science requires a research environment conducive to creativity, an environment in which the free exchange of ideas is a vital component." NSDD-189 established a set of principles and procedures that recognized three types of research and the attendant protection mechanisms that would be employed to serve them. The first, and largest, area is fundamental research, which should be available to the public and unrestricted "to the maximum extent possible." Policy not only recognized that the

benefits of doing such research in an open fashion far outweighed the potential costs of any risks, but also clearly articulated that the benefit to U.S. prosperity and economic health was worth the potential cost of other nations having access to U.S.-developed science and technology.

The landscape described in NSDD-189 also recognized a set of technologies and areas of investigation that would “demonstrably...lead to military products in a short time” and as such should be protected by a well-defined classification system. This system has been the operant tool for protecting national security assets for decades.

A final area of science and technology consisted of a small (at the time) set of dual-use technologies that could be restricted through a series of measures, which were short of formal classification. Export control laws such as the International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR) were developed to protect these technologies and place limits on the sharing and exposure of these technologies to foreign nationals.

The philosophies and policies created in the mid-1980s have consistently been reaffirmed, including by Presidents George W. Bush and Barack Obama. They have also been endorsed by the National Science Board, which “strongly reaffirm[ed] the principle behind President Ronald Reagan’s NSDD-189” in 2018. Yet, while these mechanisms and approaches have provided an effective and workable framework for decades, two new realities are calling into question whether these regimes are sufficient two decades into the 21st century.

First, the massive, decades-long growth of the technology sector, in which CMU has played a major and defining role, has created a much larger dual-use landscape than was envisioned in the mid-1980s. Many of the technologies necessary for national security—advanced computing, autonomy, artificial intelligence, wireless and cellular networking, advanced manufacturing, etc.—are now being driven by the private sector and are critical to the growth of the modern economy. Many or most of these technologies are not currently classified or controlled by the U.S. Government, creating a tension between securing these technologies and ensuring that they can continue to benefit from advancements via a broad fundamental research ecosystem.

Second, the international competitive landscape, both militarily and economically—and especially between the United States and China—is creating new tensions. Documented cases of state-sponsored attempts to illicitly acquire intellectual property and / or to exert influence on U.S. research in ways that are incompatible with our definitions of integrity and cooperation are causing reexamination of the open nature of our research environment.

The CMU community sits squarely in the middle of this debate. As a premier research university, CMU has a significant population of international students and researchers; engages with leading researchers, collaborators, and sponsors from around the world; and performs research across a wide range of science and technologies that are important to the national security of the country. It is important that we, as the CMU community, engage in a respectful dialogue about how to best balance our multiple obligations—obligations to each other, to open research, to academic freedom, to global leadership and participation, and to national security.

It is also critical that we make clear that our recognition of the general existence of state-sponsored activities is not meant to suggest a concern about any specific international member(s) of our CMU community.

Defining the balance between these realities and the proposed paths forward are the basis for this report from CMU's President's Committee on International Engagements.

## **Committee Process**

On March 14, 2019, CMU President Farnam Jahanian established the President's Committee on International Engagements. (See the Committee Charter, Appendix 1. Committee member names are shown in Appendix 2.)

The Committee's work was accomplished through a series of regular discussions and meetings and by forming four subcommittees based on the major themes of the charter:

<b>Principles</b>	What guiding principles of the University's mission, culture, and responsibilities will be used in decision making and implementation plans with respect to evaluating and undertaking international engagements?
<b>Policies and Procedures</b>	What policies and procedures related to evaluating and executing foreign engagements will be developed, modified, or reinforced to ensure that the University may further its mission via international collaborations while protecting the University, its faculty, staff, and students?
<b>Training and Education</b>	What new or enhanced education and training programs are needed for issues related to pursuing and executing international engagements? What training should be mandatory and for whom?
<b>Communications</b>	How does the Committee most effectively communicate both its work and the resulting recommendations while respectfully taking into account a spectrum of stakeholders (e.g., faculty, students, staff, Board of Trustees, external audiences, federal, and non-federal sponsors)?

While the Committee's work was proceeding, the Office of the Vice President for Research (OVRP) coordinated a series of information and training sessions for the campus community on the current landscape and interim procedures for international engagements. Committee members took advantage of these meetings to solicit input and feedback from the campus on its work and views.

In addition, the Committee considered and addressed pressing issues regarding international engagements and gave timely feedback to university leadership, for example, in the development of campus-wide messaging from the President.

The Committee provided an interim report to CMU President Jahanian on May 15, 2019. (See Appendix 3.)

In early 2020 as the Committee had a near-final report, the work was sidelined by the COVID-19 pandemic. In the interim, the international landscape has evolved and the Committee reconvened in the spring of 2021 to reflect on any needed changes to its draft report. This document is the final product of the overall effort.

## Guiding Principles

At the start of its work, the Committee agreed that a set of guiding principles should be created to provide the foundation on which any analysis and recommendations would be developed for international engagements. This is not a new approach at CMU; the Committee's work was guided by a set of principles adopted by the Board of Trustees of Carnegie Mellon University, May 21, 2007 and known as the Pollock Principles (provided in Appendix 4). The principles recommended here are intended to build on, supplement, and broaden the Pollock Principles to provide a framework on which decisions for international engagements can be based.

A summary of the principles follows (the full set of principles is in Appendix 5):

**Celebrate Global Opportunities and Relationships.** CMU is a global university with a long and successful history of research partnerships and collaborations with international academic institutions. Carnegie Mellon's international footprint and identity impacts people, systems, and society across the globe. Such active engagement enriches the fabric of CMU and maintains and furthers CMU's competitive stature.

**Sustain Academic Freedom.** CMU supports the freedom of its faculty to choose the objects of their research as well as the free generation and flow of their ideas into and out of the University. Individual researchers, subject to University policies and regulations and other relevant governing principles, are free to engage with sponsors and collaborators of their choosing.

**Mitigate Risk.** The University is committed to the responsible, considered management of all forms of risk associated with global engagements and relationships, including compliance risks in domains such as export control; security risks associated with potential theft of intellectual property (IP), sensitive, or controlled information; and reputational and opportunity risks associated with the decision to approve or not approve certain engagements, partnerships, or philanthropy. In managing these risks, CMU acknowledges that additional scrutiny of certain prospective international engagements may be needed.

**Compliance with Law.** CMU respects and obeys U.S. laws and regulations. When CMU approves a global engagement, we also respect and obey the laws and regulations of the relevant other entities, countries, and governing bodies.

**Transparent Administrative Process.** CMU promotes a transparent and efficient process for vetting, determining suitability, decision making, and execution of agreements with global sponsors, donors, and partner institutions.

## **Interim Processes**

While the Committee undertook its work, interim actions and processes were instantiated at CMU to provide guidance for those faculty and staff engaged or considering engaging with international collaborators, sponsors, or donors.

Communications were made through the OVPR, the college deans, the Associate Deans for Research, and through Advancement stating that all individuals who expected to participate in international engagements should attend at least one of a series of information sessions. These sessions were coordinated by the OVPR and conducted by the Vice President for Research, the Provost, and the General Counsel. Desired attendees included any researcher engaged with, or contemplating engaging with, a non-U.S. research sponsor, collaborator, donor, or educational participant; all OVPR staff; all University Advancement staff with international contacts; all college research administration, and all deans. These sessions provided background on the evolving national dialog on potential foreign influence, explained the governing laws and protections concerning fundamental research, reviewed disclosure requirements for government-funded researchers, described the interim approval procedures in operation, reinforced the extant policies governing international visitors to campus, and detailed resources and expertise available from which additional information could be obtained.

The interim process required all prospective international engagements – sponsored research, educational programs, and philanthropy – to be funneled through the OVPR for an assessment of risk and approval before proceeding through normal approval channels. This process applied to all prospective international engagements with extra diligence provided for those with Russia, China, Iran, Saudi Arabia, Syria, and North Korea.

Risk factors considered for prospective international engagements included:

- Agreements with any work being performed in the foreign country;
- Agreements that anticipated substantive collaboration where work would be performed by sponsor representatives either in country or in the U.S.;
- Agreements or MOU's without strict expectations and restrictive language about the use of CMU's name;
- Agreements or engagements that necessitated or provided an option for a public signing ceremony or significant announcement/public relations activity;
- Agreements that imposed significant publication restrictions; and



- Any up-front exclusive licensing of IP to a foreign entity.

A total of eight information sessions took place between April and October of 2019, with 164 attendees. Between April 1<sup>st</sup> and November 30<sup>th</sup>, 2019 over 8 specific international engagements were adjudicated through the interim process. (Most international collaboration we put on hold during the COVID-19 pandemic in 2020 and in early 2021.)

## Recommendations

The recommendations for approving and implementing international engagements for CMU are based on the Committee's conversations with stakeholders across campus and beyond, the experience gained via the interim approval processes, and observations about and engagement with the changing international landscape, especially during the time between Committee sessions. These recommendations seek to balance four key goals:

1. the need for diligence in protecting the University's intellectual property and reputation;
2. the freedom of and incentives for faculty, staff, and students to engage globally;
3. the necessity to comply with laws and regulations applicable to the University and its faculty, staff, and students; and
4. the desire to minimize the administrative burden on researchers, educators, support staff, and administrators created by any new processes. **The committee recognizes that there is significant work to be done to achieve this.**

The recommendations are also meant to complement the approaches individual colleges, departments, and / or programs use to guide their international engagements. All prospective international engagements must at least meet the criteria contained within this report. Colleges, departments, and / or programs may take a more conservative approach based on their own principles, financial and business considerations, and specific tolerance for risk.

Only after a prospective international engagement has passed the review of the college, department, and / or programs, should it be forwarded on for final approval and implementation, although the relevant offices are also available to provide advice as an engagement is being considered.

We also note that several of the recommendations noted below may require changes to university policy, and we will need to follow the standard procedures to do that quickly and effectively.

### **A. Policies and Procedures Recommendations**

The Committee recommends steps to ensure that an appropriate level of review is conducted on all potential international engagements, including international sponsored or collaborative research, educational partners, or philanthropic benefactors.

In line with the goals above, we have included recommendations that we feel will be effective in complying with the law and protecting the university while being implemented in the least burdensome and costly manner.

**Recommendation 1. A restricted party screening (RPS) process must be conducted on all prospective international collaborators, sponsors, or donors.** The overall RPS process should be owned and managed by the Export Compliance Group (ECG) within the OVPR. The RPS process should consider the appropriate level: individuals, entities, and nations, and should take into account both general (e.g., government) lists and Carnegie Mellon's own lists. As needed, the ECG should train and advise other stakeholders, such as members of University Advancement, college leadership offices, and the Office of the Vice Provost for Education (OVPE), on the RPS process.

**Recommendation 2. A list of countries and entities of concern should be identified and used to help assess whether to proceed with prospective international engagements.** This list should be managed by the OVPR in collaboration with the Office of General Counsel (OGC) and informed by (but may be broader than) related lists published by the U.S. Government. The list should be publicly available on the OVPR website.

A number of actions are recommended by the Committee for sponsored research activities.

**Recommendation 3. All research projects to be sponsored by a country or entity of concern, reasonably expected by OVPR staff to be influenced by individuals or entities in a country of concern, or otherwise flagged by the RPS process must be reviewed for approval by the OVPR.** The criteria for assessing risk should be based on the risk factors identified in the interim process (above) and should be publicly available on the OVPR website.

**Recommendation 4. All faculty and staff directly or indirectly engaged in federally or internationally sponsored research, international education, international philanthropic development activities, or outside activities related to research must complete an accurate Conflict of Interest disclosure and Conflict of Commitment disclosure and ensure they are reviewed and, if necessary, updated on an annual basis and anytime there is a change.** OVPR and OGC should provide a list of roles and/or activities that would cause an individual to be covered by this requirement<sup>1</sup>. The Office of Research Integrity and Compliance (ORIC) should establish a straightforward, on-line method to accomplish this requirement. The disclosure should provide a staged level of reporting based on the particular activities of each respondent, consistent with the relevant University policies, and aligned with the necessary reporting requirements for those participating in various sponsoring agency activities.

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<sup>1</sup> Examples might include: researchers engaged with, or contemplating engaging with, a non-U.S. research sponsor, collaborator, donor, or educational participant; OVPR staff; University Advancement staff with international contacts; college research administration, and deans, academic, and administrative department heads; as well as those staff materially supporting them in this work.

***Note that all internationally-sponsored research must also still follow normal OVPR processes including proposal submission, contract negotiation, export control, and other regulatory review, etc.***

The Committee recommends that all international educational programs receive a level of review similar to that done via the processes established for sponsored research activities.

**Recommendation 5. Proposed international educational programs must be submitted to the Provost to be reviewed for approval.** If projects are approved by the Provost (after college/department approval), they will go through standard contract processes.

Examples of proposed international education programs include collaborations with non-US universities.

For all international gifts, the Committee recommends that in addition to the RPS screening noted in Recommendation 1, University Advancement should continue its added level of review.

**Recommendation 6.** Additional review for international gifts, consistent with Recommendations 1 and 2, should be applied under existing university policy, as appropriate. CMU has a [policy](#) on the acceptance of gifts, and employs a variety of practices and precautions to manage our growing community of donors and prospects so that we know from whom we are accepting philanthropic gifts and to comply with any external reporting requirements. These practices include reviewing all gifts of \$1,000 or more to confirm we know the donor, and utilizing gift agreements for new gifts of \$25,000 or more.

Experienced and knowledgeable people in each college will be important resources to ensure up-to-date information is available and that new processes are followed.

**Recommendation 7. Each college must designate points of contact (PoCs) for their international engagements.** These people should clearly communicate process changes for international engagements, manage the flow of accurate information, and serve as the interface with the OVPR, OVPE, or University Advancement (UA) as appropriate for decision making and approvals. The PoCs should be at the Associate Dean level (for Education, Research, Advancement, or similar roles, as appropriate).

Note that the Committee is not recommending that colleges conduct significant investigation of prospective partners, and instead, suggests a common-sense awareness and guidance approach. If there are any concerns about the credibility or nature of a prospective partner, please contact the ECG.

## **B. Training and Education Recommendations**

During the course of the Committee's work, several areas emerged where training and education would benefit those who engage in international collaborations. These recommendations take into account the need for researchers and educators to have sufficient

knowledge to understand and mitigate risks, and at the same time, not to burden them with unnecessary or overly complex requirements.

**Recommendation 8. The Office of Research Integrity and Compliance (ORIC) should develop and maintain export control training.** This training should include a brief, online overview module that can be completed in less than ten minutes and that ends with a straightforward decision rubric that will determine if the individual, upon completion of that module, should continue with more detailed on-line module(s). Among situations indicating the requirement that the more detailed module(s) need to be completed will be the individual's participation in activities with at-risk countries or in research/education areas where export control is a clear risk factor. ORIC should maintain records of completion of the training modules that are accessible to each participant. The OVPR website should provide information about and the link to the export control training. The overview module should be made available within three months and the additional modules within six months of the approval of these recommendations.

**Recommendation 9. All faculty and staff who are or may be participating (directly or indirectly via materially supporting roles) in international sponsored research, education, or philanthropic development activities must complete export control training. (Graduate students materially participating in research activities related to the above must also complete the training.) OVPR should provide further guidance on what constitutes participation.** All such faculty, staff, and students must complete the on-line export control training described in Recommendation 8. The overview module of the training should be completed within six months of the deployment of the export control training (or within three months after starting at CMU). Where warranted (and when available), individuals should also complete the more detailed training within two months after the overview.

**Recommendation 10. The Office of the Chief Information Officer (OCIO) should provide guidance for all mobile devices (e.g., laptops, tablets, and phones) that connect directly to CMU's network for those traveling internationally.** The OCIO should also provide and manage a loaner program for mobile devices, provide suggestions for their use (including VPN capability), and establish procedures for verifying device hygiene upon return to the U.S. The OCIO should ensure this capability is available across the University in partnership with the colleges.

### **C. Communications Recommendations**

In order to update the University community on the findings and recommendations of this Committee, be responsive to the international political landscape, and create increased awareness for those who do or may have international engagements, a number of communication channels are recommended.

**Recommendation 11. The OVPR should create and maintain a webpage with information about international engagements.** This webpage should be part of the University website and maintained with up-to-date information, including how to have prospective international engagements reviewed for approval, access to international travel support resources, recommended and required training, and agency disclosure requirements. Information about international sponsored or collaborative research projects, education, and gifts should also be included.

**Recommendation 12. The OVPR should continue to provide information sessions about international engagements.** These sessions should occur on at least a quarterly basis for the college PoCs, who should provide updated information from these sessions to faculty and staff who are or may be engaging in international activities. At least one generally available information session per semester should target new employees (as part of the orientation process) and those newly involved with international collaborations.

**Recommendation 13. OVPR should review CMU's Visitor Policy and information about the policy should be included as part of OVPR's information sessions about international engagements.** The visitor policy should address international visitors of all kinds, including but not limited to faculty and students from foreign universities, as well as employees of foreign sponsors.

#### **D. Recommendations for Going Forward**

The issues prompting the formation of this Committee and the recommendations contained in this report are meant to address the current complex and fluid international political landscape. While some might contend that the attention being paid to university engagement with foreign entities, particularly with China, is partly a result of the previous U.S. Administration, it is unlikely to quickly fade. The debate regarding China as both a national security adversary and as an economic competitor crosses party lines. The Committee believes that CMU has an important role in advocating for understanding and reasonable approaches to international engagements. This role is defined by the University's long history of leadership both as an open, global research university and as a significant contributor to national security through work in policy, research, and education. The last three recommendations from the Committee follow.

**Recommendation 14. University senior leadership should advocate externally for realistic, balanced approaches to guide international engagements with U.S. academic institutions.** College and University senior leaders should work to develop positions and advocacy by participating in peer groups, such as the Association of American Universities (AAU), the Council on Governmental Relations (COGR), and the Association of University Export Control Officers (AUECO); in Congressional briefings; and in agency working groups. CMU participation in these activities should be continual, concerted, and coordinated.

**Recommendation 15. University leadership should maintain awareness of emerging trends, threats, and (proposed or enacted) regulations about international engagements that might affect the University's ability to execute its mission.** The primary responsibility for maintaining this situational awareness should rest with the OVPR, the OGC, and the Government Relations team, and should be informed by other national-level thought leadership groups.

**Recommendation 16. This International Engagements Committee should continue to meet at least quarterly.** The Committee should monitor implementation of the recommendations contained in this report and provide periodic updates to the CMU leadership and community on changes to threats, policies, and procedures. Committee chairs will meet periodically with the President to determine if committee membership should be modified.

## **Summary**

The recommendations from CMU's President's Committee on International Engagements contained within this report will help to ensure thoughtful and intentional approaches for the University's international engagements. The recommendations are meant to build upon the practices that already exist in the University's colleges, departments, and programs. They are meant to provide a framework that can be adapted into the future for navigating a complex international landscape.



## Appendix 1 – Committee Charter

**Subject:** President's Committee on International Engagements

**Date:** Thursday, March 14, 2019 at 2:43:49 PM Eastern Daylight Time

**From:** Farnam Jahanian

*Please forward this email to your constituencies, as you deem appropriate.*

Dear Colleagues:

Carnegie Mellon's leadership in research has placed this institution at the forefront of disciplines that are changing the world in fundamental ways. The pursuit of new knowledge informs our teaching and contributes to national and global economic growth, while providing service to our public and private sponsors.

The university has reached this position by, almost exclusively, the performance of fundamental research on an open campus, the results of which are freely publishable by researchers who have the academic freedom to pursue lines of inquiry of their choosing.

Carnegie Mellon research is funded in a variety of ways. The United States government, and its various agencies and Departments, fund the largest portion of our research (as is the case with most of top U.S. research universities). Private sector sponsorship of research by U.S. and non-U.S. companies and organizations also has developed into a significant funding source. In recent years, foreign companies and institutions have become more actively interested in sponsoring research at U.S. academic institutions, including CMU. When our faculty wish to accept research sponsored by any international sponsor, it must be conducted in accordance with U.S. law, particularly export control laws.

In addition to our research portfolio, individuals and organizations are increasingly interested in the educational capabilities and philanthropic mission of CMU. Just as with our research sponsorships there are unique issues we must consider when we contemplate these kinds of international engagements.

In recent months we have seen expanded dialogue amongst our primary U.S. Government funding agencies on the topic of how best to protect vital U.S. economic and national security interests while maintaining global participation and leadership in research. There is an elevated focus on conflict of interest disclosure requirements and growing debate about potential changes to U.S. export control laws. These are developments that are tied directly to the University's core research mission. Based on a preliminary review of this subject by then Vice Provost for Research, Gary Fedder, we have been operating with additional oversight through the Office of the Vice President for Research for all foreign engagements under consideration. We are also in the process of rolling out enhanced export and foreign investment compliance training for such activities.

Given the importance of this topic, I have asked Provost Jim Garrett and Vice President for Research Michael McQuade to co-chair the newly established President's Committee on International Engagements. The Committee is chartered to:

1. Develop high level principles to be used to guide the establishment of new engagements with foreign sponsors.
2. Formulate specific criteria for evaluating and approving engagements.
3. Examine our processes for review and approval of foreign sponsored research, educational activities and philanthropy and make recommendations on any process changes we need to implement, all while ensuring transparency and efficiency in those processes.

4. Examine our visitor policies for international visitors of all kinds, including but not limited to faculty and students from foreign universities, employees of foreign sponsors, and make recommendations for any changes needed.
5. Recommend any modifications or additions needed to both optional and mandatory training programs to ensure compliance with applicable laws, rules and regulations.

I am grateful to the following members of our community who have agreed to serve on the Committee:

- Burcu Akinci, Professor, Civil and Environmental Engineering, Associate Dean for Research, College of Engineering;
- Mary Jo Dively, Vice President and General Counsel;
- Brian Junker, Professor, Statistics, Associate Dean, Dietrich College of Humanities and Social Sciences;
- Philip Lehman, Associate Dean for Advancement, School of Computer Science;
- Krzysztof Matyjaszewski, Professor, Chemistry, Mellon College of Science;
- Scott Mory, Vice President for University Advancement; and
- Ken Koedinger, Professor, Human Computer Interaction, School of Computer Science.

I am asking the Committee to provide its initial findings and recommendations by May 15, 2019; and to complete its work so that any necessary changes can be implemented by the start of the next academic year.

Our international engagements are vital elements that help define CMU as an innovative global university. The work of this Committee will help us preserve and enhance our ability to engage broadly with partners across our society and continue to contribute to our collective prosperity.

Please join me providing any necessary input and support to the Committee.

Sincerely,

Farnam Jahanian  
President  
Henry L. Hillman Chair  
Carnegie Mellon University



## Appendix 2 – Committee Members

### Co-Chairs

James Garrett	Provost and Chief Academic Officer
Michael McQuade	Vice President for Research

### Committee Members

Burcu Akinci	Professor, Civil and Environmental Engineering, Associate Dean for Research, College of Engineering
Tara Branstad *	Associate Vice President, Research Operations
David Creswell *	Professor, Psychology, Associate Dean for Research, Dietrich College
Mary Jo Dively	Vice President and General Counsel
Brian Junker †	Professor, Statistics, Associate Dean for Academic Affairs, Dietrich College of Humanities and Social Science
Ken Koedinger	Professor, Human Computer Interaction, School of Computer Science
Philip Lehman	Associate Dean for Advancement/Strategic Initiatives, School of Computer Science
Krzysztof Matyjaszewski †	Professor, Chemistry, Mellon College of Science
Curtis Meyer *	Otto Stern Professor of Physics, Associate Dean for Research, Mellon College of Science
Scott Mory	Vice President for University Advancement
Key Nuttall †	Vice President for Marketing & Communications

### Additional Participants

Heather Bragg *	Executive Director, Office of Research, Integrity and Compliance
Becky Culyba	Associate Provost
Gera Jochum *	Senior Director, Communications for Research and Strategic Academic Initiatives
Lisa Krieg	Associate Vice President, Director of Enrollment Services and International Programs
David Quinn	Assistant Vice President, Strategic Research Initiatives, Office of the Vice President for Research
Emily Rybinski *	Assistant Director, OVPR

† First Session 2019 only

\* Second Session 2021 only

## Appendix 3 – Interim Report

**Carnegie Mellon University**

Office of the Vice President for Research  
Carnegie Mellon University  
5000 Forbes Avenue  
Pittsburgh, Pennsylvania 15213-3890

**J. Michael McQuade**  
Vice President for Research  
[mmcquade@andrew.cmu.edu](mailto:mmcquade@andrew.cmu.edu)

### MEMORANDUM

To: Farnam Jahanian  
From: Jim Garrett & Michael McQuade  
Date: May 15, 2019  
Subject: Update on International Engagement Committee

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Dear President Jahanian,

This note provides an interim update on the activities of the President's Committee on International Engagements.

The full committee has met three times since being chartered on March 14. As a reminder, the goals of the committee are to:

1. Develop high level principles to be used to guide the establishment of new engagements with foreign sponsors.
2. Formulate specific criteria for evaluating and approving engagements.
3. Examine our processes for review and approval of foreign sponsored research, educational activities and philanthropy and make recommendations on any process changes we need to implement, all while ensuring transparency and efficiency in those processes.
4. Examine our visitor policies for international visitors of all kinds, including but not limited to faculty and students from foreign universities and employees of foreign sponsors, and make recommendations for any changes needed.
5. Recommend any modifications or additions needed to both optional and mandatory training programs to ensure compliance with applicable laws, rules and regulations.

We are tasked to provide recommendations by late summer so that any implementation plans can be started in the fall 2019 semester.

The committee has divided its work into four areas and is using a subcommittee structure with each subcommittee being coordinated by an EMT member:

Principles	Garrett	What guiding principles of the university mission, culture and responsibilities will we use in decision making and implementation plans with respect to evaluating and undertaking international engagements?
Policies and Procedures	McQuade	What policies and procedures related to evaluating and executing foreign engagements will be developed, modified or reinforced to ensure that the University may further its mission via international collaborations while protecting the university, its faculty, staff and students?
Training and Education	Dively	What new or enhanced education and training programs do we need on issues related to pursuing and executing international engagements? What training should be mandatory and for whom?
Communications	Mory	How do we most effectively communicate both the work of the committee and the resulting recommendations respectfully taking into account a spectrum of stakeholders (faculty, students, staff, BOT, external audiences, federal and non-federal sponsors)?

Much of the work to date has focused on briefing the committee on relevant regulatory issues and conversations out of Washington D.C. and with other Universities so they have the relevant background and guidance to inform their work and recommendations. Sub-groups have begun their meetings and substantive progress has been made toward drafting a Guiding Principles document that will inform the rest of the committee recommendations. Attached is a copy of the latest working draft of that document.

In addition, there has been significant discussion regarding the issue of training and awareness of relevant compliance domains such as export control and visitor policies and procedures. The committee continues to iterate on these issues. However, several themes and preliminary recommendations have emerged:

- In general, CMU Faculty, staff and students would benefit from more systematic and structured resources aimed at increasing **awareness** and **understanding** of export control regulations and how those regulations can or should govern their work;
- However, the programs and resources for increasing **awareness** versus **understanding** should be differentiated. For example, resources aimed at increasing awareness should be short, concise and relevant for most or all of the CMU community. Resources aimed at increasing understanding should be more detailed and targeted at specific stakeholders based on their role (PI, researcher, administrator);
- Final recommendations for the degree to which training can or should be mandatory should balance compliance risks against the opportunity and adherence risks posed by imposing new requirements on faculty and staff time and resources.

The Vice President for Research has already directed the Export Compliance Group (ECG) to develop new or revised training materials and programs in the interest of meeting these needs. This includes reviewing and leveraging comparable materials and programs at the SEL. The committee will continue to inform the work of the ECG on this topic.

In parallel to the committee work, we continue to host interim guidance sessions for those with current or projected international engagements - researchers, advancement and educational programs. As part of the committee's outreach to the campus, we are also using these sessions to ask for additional input to the committee as it performs its work.

We thank you for the opportunity to lead on this important topic. The committee will provide you another update at the end of June. In the interim, we are available at your convenience for any specific questions or comments.

Best Regards,



James Garrett  
Provost



Michael McQuade  
Vice President for Research

## Appendix 4 – The Pollock Principles

### The Pollock Principles Resolution Regarding Global Initiatives

**Whereas**, Carnegie Mellon University has a tradition and history of advancing knowledge through research and teaching; and

**Whereas**, Carnegie Mellon University has operated since its founding to reach out to otherwise underserved individuals whose educational opportunities have been limited; and

**Whereas**, Carnegie Mellon University has grown in capabilities to become one of a select number of premier American universities respecting both its research competence and its intentional approach to student learning through open inquiry and development of critical thinking skills with, both research and teaching, emphasizing interdisciplinary entrepreneurship; and

**Whereas**, Carnegie Mellon University has long attracted students, researchers and teachers from diverse cultures, countries and socio-economic backgrounds; and

**Whereas**, Carnegie Mellon has a comparative advantage relative to many of its peers in the form of distinctive strengths in education and research which are of special interest to governments, corporations, and other organizations involving global delivery of services; and

**Whereas**, Carnegie Mellon has a comparative advantage relative to many of its peers in its extensive experience in a range of modes of delivery, pedagogical approaches, and the creative use of information technologies to expand educational and research interactions into global presence and global interactions.

**Now, therefore, be it resolved**, that as Carnegie Mellon University extends its international presence for the purpose of advancing human knowledge and understanding, it shall be guided and governed by the following Principles:

1. Carnegie Mellon University shall control admissions, curriculum and faculty appointments consistent with existing policies in the Faculty Handbook.
2. Carnegie Mellon University standards shall be maintained for all programs and activities.
3. Programs and activities shall not compromise the operational or financial integrity of associated academic units or that of the university.
4. Undergraduate programs shall emphasize development of critical thinking skills in addition to acquisition of competence in selected arts and sciences.
5. Interaction among and between research and learning locations shall be encouraged.
6. Carnegie Mellon University policies of academic freedom of inquiry and freedom of expression shall be assured.
7. Professional masters programs may be tailored to meet local requirements consistent with the overall mission and policies of Carnegie Mellon University.

*From May 21, 2007 Annual Meeting of the CMU Board of Trustees*

## Appendix 5 – CMU Principles on Global Engagements

Carnegie Mellon University has welcomed faculty, students, and staff from around the world since our very founding. We believe that being part of the global community enriches all of us, including our vibrant network of more than 113,000 alumni worldwide. We are committed to sustaining this community.

As a member of the global community, with commensurate impact and reach, Carnegie Mellon University is committed to improving the human condition through our research and educational missions. The University's many successes situate us as leaders in disciplines that are changing the world in fundamental ways. Through the intellectual contributions of our faculty, researchers, students, alumni, and staff from many countries and from diverse cultures and backgrounds, our pursuit of new knowledge informs our teaching and research foci and contributes to national and global economic growth. The following core principles guide the University's engagement with global educational partners and research partnerships with public and private sponsors:

**Celebrate Global Opportunities and Relationships.** CMU engages with institutions, individuals, communities, and industries across the globe to impact people, systems, and societies, acknowledging that valuable new research and educational opportunities benefit our faculty and students. Such active engagement within and across boundaries enriches the fabric of CMU. This global reach and impact serve to maintain and further CMU's competitive stature. When considering global opportunities, CMU will continue to abide by the Pollock Principles, adopted by the University's Board of Trustees at their Annual Meeting on May 21, 2007.

**Sustain Academic Freedom.** As a premier U.S. research university committed to academic freedoms inherent within US higher education, CMU supports the freedom of its faculty to choose the object of their research as well as the free generation and flow of their ideas into and out of the university. CMU strives to maintain an environment in which each individual researcher, subject to the boundaries set by policies and regulations and other relevant governing principles, is free to engage with sponsors and collaborators of their choosing, independent of the choices of their peers.

**Mitigate Risk.** The University is committed to the responsible, considered management of all forms of risk associated with global engagements and relationships. This includes, but is not limited to, compliance risks in domains such as export control and security risks associated with potential theft of intellectual property (IP) and sensitive or controlled information that may also extend into risks to national security as well as reputational and opportunity risks associated with the decision to approve or not approve certain engagements, partnerships, or philanthropy. The University will continually evaluate and balance these risks in the interest of maximizing the ability of the entire community to fulfill its overall education and research missions. In doing so, we acknowledge that additional scrutiny of certain prospective international engagements may be needed. The University is committed to expeditiously completing such reviews.

**Compliance with Law.** CMU respects and obeys U.S. law and regulation wherever it is applicable. When we approve a global engagement, CMU will respect and obey the laws and

regulations of other entities, countries, or governing bodies. In considering prospective global engagements, CMU will consider how compliance with the laws of other entities, countries, or governing bodies is or is not compatible with other principles of the University and its mission as a not-for-profit institution of higher learning.

**Transparent Administrative Process.** CMU promotes a transparent and efficient process for vetting, determining suitability, decision-making, and execution of agreements with global sponsors, donors, and partner institutions.