Implementation Status of the Recommendations from the [Report from the President's Committee on International Engagements](#)
Status as of: March 15, 2022
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No.	Recommendation	Status and Details (as of Date indicated above)
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.	Status: Complete Details: The Export Compliance Group has developed and deployed screening processes that leverage the Amber Road restricted party database and CMU's own lists. All sponsors, collaborators and donors that appear on proposals, awards, gift agreements and other contracts are screened according to these processes either by the Export Compliance Group or via trained members of other units including; the Office of Sponsored Programs (OSP), University Advancement (UA), the Software Engineering Institute (SEI), the Center for Technology Transfer and Enterprise Creation (CTTEC), and the University Contracts Office (UCO). Members of the Provost Office are also currently being identified for similar training in the review of prospective educational partnerships and programs. Other units or individuals interested in taking advantage of this screening process in other contexts (ie, informal collaboration, prospective consulting arrangements etc.) should contact the Export Compliance Group [export-compliance@andrew.cmu.edu].
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.	Status: Complete Details: The Office of Research Integrity and Compliance (ORIC) in the OVPR maintains [this list of countries of concern](#). Questions about the list should be directed to the Export Compliance Group (export-compliance@andrew.cmu.edu).
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.	Status: Complete/Nearly Complete Details: The escalation and review process for countries of concern, projects reasonably expected by OVPR staff to be influenced by individuals or entities in a country of concern, and/or those flagged by the RPS screening process is part of a [larger checklist and escalation procedures within the OVPR](#) [link to checklists behind andrew authentication]. This process is well defined for individuals or entities that are identified in the relevant contract documents.
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 [1]. 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. [1]: 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.	Status: In Progress Details: Implementing this plan is highly dependent on evolving federal regulations regarding Conflict of Interest, Conflict of Commitment and "Current, Pending and Other Support" requirements for federal agencies. In the time since the committee report was issued, federal agencies and the National Science and Technology Council (NSTC) have issued several updates or clarifications to existing policies as well as signaled the direction of future policy. Most recently, the NSTC issued [guidance to federal agencies for implementing National Security Presidential Memorandum 33 (NSPM-33)](#). ORIC is expanding participation in and implementing changes to the COI and COC processes (over two phases) to ensure compliance with these evolving regulations and support required agency disclosures. These changes will be communicated to all faculty and staff ahead of their implementation
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.	Status: In progress Details: The OVPE is developing specific guidelines and criteria for the review and approval of prospective international education programs. In the interim period, anyone contemplating any partnership or program that involves any of the following are required to consult with the OVPE: • a written agreement with a foreign entity (including non-binding memoranda of understanding); • delivering course content that is not: typically used in teaching (i.e. information released during instruction in a

		catalog course or associated teaching laboratory of CMU or another academic institution), or otherwise is information already published or in the public domain (e.g. books, newspapers, pamphlets; publicly available technology and software; information presented at conferences, meetings, and seminars open to the public; information included in published patents; websites freely accessible by the public). Contact VPE@andrew.cmu.edu if any prospective engagement meets the above criteria or you are unsure. All such inquiries should be made at least 30 days prior to the date by which the unit intends to begin the associated program. This and subsequent guidance will be captured on the OVPR International Engagements guidance website as well as disseminated via appropriate channels such as college-level international engagement POCs, associate dean groups, departmental leadership meetings and Faculty Senate.
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.	Status: Complete Details: The review of international gifts is coordinated between University Advancement and the OVPR as part of a broader international agreement review and escalation process.
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).	Status: In progress Details: Deans have been asked to identify their respective international partnership POCs. POCs will be briefed and trained on relevant processes and policies so they may act as a resource for their unit(s) and as a communication channel between their units and central leadership and compliance offices. When POCs are named and trained, this information will be posted on the OVPR International engagements and partnerships website.
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.	Status: In progress Details: A draft/beta version of the overview training has been developed and deployed on the Canvas platform. This training is currently used for training researchers on projects that require technology control plans due to the use of export controlled materials or information. The module and to whom it is made available and/or required is currently being refined by ORIC in light of the committee recommendations and other evolving training requirements from federal agencies.
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-lineexport 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.	Status: In progress Details: See update on recommendation #8, noting that new and evolving federal requirements may broaden what should be included in the overview training and may influence the definition of "participation" for the purposes of training requirements.
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 theUniversity in partnership with the colleges.	Status: In progress Details: The OCIO and the Information Security Office (ISO) have generated relevant international travel guidance covering what to do before, during, and after travel. This augments the general guidance for secure computing and complements other related international travel guidance from the Office of Research Integrity and Compliance. The OCIO is currently exploring options with college and departmental colleagues for broader loaner and device hygiene programs. As these programs are being developed, those

		interested in loaner devices and/or assistance in scanning or cleaning devices after travel should reach out to their department IT organizations and/or it-help@andrew.cmu.edu.
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.	Status: Completed Details: The OVPR has launched an International Partnerships and Engagements guidance page that is intended to aggregate the information and guidance related to pursuing, reviewing and executing international partnerships and engagements.
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 (aspart of the orientation process) and those newly involved with international collaborations.	Status: Ongoing Details: Information about information sessions can be found on the OVPR International Partnerships and Engagements page.
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.	Status: Completed Details: Information about the CMU Collaborating Visitor Process was included in the most recently delivered Information session from the OVPR. Similar information will be included in all future sessions.
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.	Status: Ongoing/Continuous Details: The President, Provost, VPR, deans, and leadership from their respective offices continue to participate in a host of activities which they continue to advocate for a balanced approach from lawmakers and agency leadership that preserves non-discriminatory and minimally burdensome policies that support fundamental research and preserve security. These activities include participating in and leading subgroups from the aforementioned peer groups (AAU, COGR etc.) as well as responding to requests for information and comment on prospective federal policies and rules around export control and research security.
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.	Status: Ongoing/Continuous Details: Members of the OVPR, OGC and Government relations remain active in their respective peer groups (AAU Senior Research Officers, COGR, AUECO, EDUCAUSE and others) as well as in congressional briefings to remain apprised of the national and international landscape.
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 CMUleadership 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.	Status: Ongoing/Continuous Details: The membership of the International Engagements Committee is being re-evaluated by the Provost and VPR in light of leadership transitions within CMU, the college level points of contact that have been/will be identified as a result of recommendation #7, and the evolving federal regulatory landscape. Previous membership is being consulted regarding the current status of the implementation of recommendations and future directions. A reconstituted committee will meet quarterly as per the recommendation.