

Carnegie Mellon University

Collaborating Visitor Guidelines

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I. Introduction

Carnegie Mellon University (CMU) faculty are encouraged to collaborate with colleagues and students from other academic institutions, as well as scientists and scholars from industry or the public sector. This collaboration may involve inviting the collaborator to visit the university for a period of time, or spending time at the collaborator's home institution.

Before inviting a collaborator to visit CMU, the university must assure that granting Collaborating Visitor status and the attendant privileges will not violate applicable laws, regulations, institutional policies or contractual commitments to sponsors, and that appropriate documentation is in place. Therefore, before extending an invitation, the sponsoring faculty/staff host and the sponsoring department must assure that the below process has been followed.

II. Definition of a Collaborating Visitor

What is a “Collaborating Visitor”?

The term Collaborating Visitor is used throughout the University for a wide variety of purposes. For purposes of these guidelines only, a “Collaborating Visitor” is defined as an individual who visits CMU to collaborate with university personnel and/or to access the university's facilities, resources, or intellectual property that are not open or available to the public.

Collaborating Visitors may include, but are not limited to:

- a faculty member employed by another academic institution;
- a student who is enrolled in an academic program at another institution;
- an unpaid intern¹ who is not an enrolled CMU student;
- an individual who is employed in industry or the public sector; and
- in less common circumstances, a self-supported scholar.

For purposes of these guidelines, a Collaborating Visitor is **not** one of the following:

- Paid employees (faculty, staff, or students) and paid interns of CMU
- Students who are, or will be, enrolled at CMU while they are at CMU (including “visiting/non-degree students” who are enrolled in classes)
- Individuals on leave from another institution who are granted paid temporary “visiting faculty” status under one of the University's faculty policies (e.g. a faculty member on sabbatical from another institution who is temporarily employed by CMU as Special Faculty)
- Individuals visiting CMU as, or on behalf of, a contractor, subcontractor, or consultant where the purpose and tenor of the visit are covered by a separate written agreement with CMU (e.g. a subcontractor visiting CMU to perform duties under the contract)
- Individuals at CMU for limited purposes such as attending a conference open to the public, attending an academic conference, participating in a thesis review panel, participating in an interview, giving a talk, and touring public areas

¹ There are special standards and requirements that apply to unpaid internships. For more information regarding unpaid internships, see, <https://www.Carnegie Mellon.edu/hr/internship/index.html> and http://www.Carnegie Mellon.edu/career/employers/on-campus_employers/documents/types-of-student-work/unpaid-internship-considerations.pdf

- Spouses, domestic partners, and dependent children of faculty, staff, students, or Emeriti faculty and retired faculty/staff who access certain University facilities (e.g. athletic facilities) under a sponsored ID card
- Other individuals whose access to University property is governed by a separate written agreement or policy (e.g. individuals covered by consortium agreements with specific terms related to access to University property, individuals coming to the University as participants in human subjects research with a signed consent form)

NOTE: If a department decides to supplement the financial support that is provided to a Collaborating Visitor by his or her home institution, the individual may be deemed to be an employee of CMU for legal purposes (and NOT a Collaborating Visitor). Thus requiring that the University follow all employment practices and processes and meet applicable legal, regulatory, and policy standards.

If the individual does NOT fit any of the examples listed above, please contact CMU Collaborating Visitor Support at visitor-support@andrew.cmu.edu for assistance with making the appropriate determination.

In general, for what purposes may someone be invited to visit?

Collaborating Visitors are invited to spend time on our campus to collaborate with members of the CMU community, learn about the work of CMU, or make use of CMU facilities or resources. Ultimately, the Collaborating Visitor should not be at CMU to perform services for the benefit of CMU or doing the kind of work for which CMU pays its faculty and staff (e.g., teaching, advising graduate students, helping to create deliverables under a CMU sponsored research agreement, providing managerial or administrative services). Individuals performing services for the benefit of CMU generally should do so as an employee or as a contractor.

Please note that if a current Collaborating Visitor's activities on campus change at any point during his/her visit, you will need to contact CMU Collaborating Visitor Support at visitor-support@andrew.cmu.edu to reevaluate the individual's status as a Collaborating Visitor.

For what duration may someone be on campus as a Collaborating Visitor?

When determining whether an individual qualifies as a Collaborating Visitor under this process, the nature of the individual's activities on campus is determinative and the length of time on spent on campus is largely irrelevant. As such, the duration of a Collaborating Visitor relationship may vary and could be as short as a few hours or up to a year. In general, however, short-term guests at CMU (e.g. less than 1 week) are not considered Collaborating Visitors because they typically do not collaborate on university research and are not given access to the university's non-public facilities, resources, or intellectual property. However, short-term guests who do collaborate on university research and/or are given access to non-public facilities, resources, or intellectual property are Collaborating Visitors, even if the duration of the relationship is very short.

Collaborating Visitor relationships generally last no more than one year. But in some rare circumstances, it may be appropriate to extend a visit beyond a year in order to complete the collaborative work or achieve the other appropriate purpose for the visit. Visits lasting longer than 1 year are subject annual review by CMU Collaborating Visitor Support. Sponsoring departments and faculty/staff should be mindful of space and other resource limitations, and when committing these resources to Collaborating Visitors and they should consider the potential impact on other faculty, students, staff or even other potential Collaborating Visitors.

What distinguishes unpaid interns from visiting students?

Unpaid interns are a sub-category of Collaborating Visitors. Unpaid interns typically are students or recent graduates who perform work for the university as part of a training/learning program that is related to the intern's academic studies. Unpaid internships must comply with the U.S. Department of Labor guidelines for trainee/learning programs – see <https://www.CarnegieMellon.edu/hr/internship/>. Interns who do not meet the Department of Labor criteria must be paid.

Visiting students typically come to CMU to work on their own academic projects and do not provide services or work for CMU or for individual staff or faculty. However, faculty and staff may provide visiting students with advice and guidance. Visiting students may also seek to use CMU facilities or resources to further his/her own project.

For example, a visiting student from another institution may visit CMU in order to use a particular laboratory or perhaps to seek advice from a CMU faculty/staff member to further the Visitor's own research project. An unpaid intern, on the other hand, may work on a faculty/staff research project at CMU in connection with a training/learning program designed to teach the unpaid intern research skills and techniques.

III. Collaborating Visitor Process Summary

1. Determine if the individual is a Collaborating Visitor

Check that your proposed Collaborating Visitor meets the definition of a Collaborating Visitor to CMU in Section II.

If the individual does NOT fit any of the examples listed in Section II, please contact CMU Collaborating Visitor Support at visitor-support@andrew.cmu.edu for assistance with making the appropriate determination.

2. Follow the Process for Screening and Approving Collaborating Visitors to CMU

Section	Step	Required Action	Time Frame
1		Gather Information and Submit Collaborating Visitor Request	
1.1		Non-U.S. Person Collaborating Visitors*	
	1	IF the Collaborating Visitor is a Non-U.S. Person, faculty/staff host shall gather the following information and supporting documentation: <ol style="list-style-type: none"> 1. CMU OIE Forms: https://www.cmu.edu/oie/ 2. Completed FCPA Form 3. Completed Collaborating Visitor Questionnaire 4. CV/Resume 	
	2	Faculty/staff host shall submit the OIE Forms to OIE at least 90 days in advance of a Collaborating Visitor's expected arrival at a CMU U.S. Campus(es).	Minimum of 90 Days in Advance
	3	Faculty/staff host shall submit the Completed FCPA Form, Completed Collaborating Visitor Questionnaire, and CV/Resume To CMU Collaborating Visitor Support at: Visitor-support@andrew.cmu.edu with the email subject line Collaborating Visitor Request at least 60 days in advance of a Collaborating Visitor's expected arrival at a CMU U.S. Campus(es).	Minimum of 60 Days in Advance
1.2		U.S. Person Collaborating Visitors	
	1	IF the Collaborating Visitor is a U.S. Person, faculty/staff host shall gather the following information and supporting documentation on the Collaborating Visitor: <ol style="list-style-type: none"> 1. Completed Collaborating Visitor Questionnaire 2. CV/Resume 	
	2	Faculty/staff host shall submit all items above to CMU Collaborating Visitor Support at: Visitor-support@andrew.cmu.edu with the email subject line Collaborating Visitor Request at least 30 days in advance of a Collaborating Visitor's expected arrival at a CMU U.S. Campus(es).	Minimum of 30 Days in Advance

Section	Step	Required Action	Time Frame
2		Centralized Processing of ALL Collaborating Visitor Requests	
	1	CMU collaborating visitor inbox shall send an automated acknowledgement to the requesting faculty/staff host .	Immediately after request is sent
	2	CMU Collaborating Visitor Support shall: <ol style="list-style-type: none"> 1. Review the information provided and will contact faculty/staff host if any relevant information is missing and/or if the Collaborating Visitor has been incorrectly categorized; and 2. Conduct restricted party screening on the Collaborating Visitor, their home institution, any other current affiliations, and/or funding sources for their visit. 	Within 2 Business Days After Receipt
	3	After receiving and reviewing the completed Collaborating Visitor Questionnaire, CMU Collaborating Visitor Support shall: <ol style="list-style-type: none"> 1. Send a formal acknowledgement email to the faculty/staff host with a case number; and 2. Forward the information to the impacted CMU departments (ECG, OSP, and/or OGC) for their review. 	2 Business Days After All Information is Obtained
	4	Each impacted CMU department will communicate directly with the faculty/staff host with any questions pertinent to their individual review. IF OSP is an impacted CMU department on a case, OSP will send any recommended custom language for collaborating visitor letters and/or recommended category for the collaborating visitor agreement directly to the faculty/staff host , copying CMU Collaborating Visitor Support .	Dependent on Departmental Case Loads & faculty/staff host's Responses to Requests
	5	Each impacted CMU department will provide their final determination to CMU Collaborating Visitor Support for distribution to faculty/staff host and centralized recordkeeping.	Same as 2.4
	6	CMU Collaborating Visitor Support shall send an email to the faculty/staff host notifying them of the final determinations from all impacted CMU departments and instruct faculty/staff host to issue any applicable documentation (e.g. Collaborating Visitor invitation letter and Collaborating Visitor Agreement) in that email and return both the signed Collaborating Visitor Invitation Letter and Collaborating Visitor Agreement to the CMU collaborating visitor inbox.	2 Business Days After Receipt of All Answers
	7	Faculty/staff host shall email all signed required applicable documents in a reply all email to CMU	2 Business Days After

Section	Step	Required Action	Time Frame
		Collaborating Visitor Support , who shall record the information in Sharepoint.	Approval is Received

*NOTE: For **Non-U.S. Person Collaborating Visitors**, the **faculty/staff host** must contact **OIE** via the department's Foreign Scholar Coordinator to begin the visa document process.

IV. Detailed Collaborating Visitor Process

Section 1: Gather Information & Submit Collaborating Visitor Request

The host department must gather and submit the following information and documentation to CMU Collaborating Visitor Support at visitor-support@andrew.cmu.edu with the email subject line Collaborating Visitor Request to begin the Collaborating Visitor review process:

1. [The Collaborating Visitor Questionnaire](#). The questionnaire is required for all Collaborating Visitors to CMU that meet the definition outlined in Section II. The answers to the questionnaire will inform CMU Collaborating Visitor Support of additional required steps in the process. If you have questions or require assistance in completing the questionnaire, please contact CMU Collaborating Visitor Support at visitor-support@andrew.cmu.edu
2. Curriculum Vitae/Resume (required for all Collaborating Visitors to CMU)
3. Completed FCPA Form (for non-U.S. person Collaborating Visitors to CMU only)

Important Steps for Collaborating Visitors Requiring a Visa

Collaborating Visitors who are not U.S. persons (U.S. citizens, U.S. permanent residents, nor individuals with refugee or political asylee status in the U.S.) usually need to obtain a visa. Typically, the most appropriate option for Collaborating Visitors is the J-1 visa in either the "Short Term Scholar", "Research Scholar" or "Student Intern" category. **IMPORTANT NOTE:** This process is separate from the Collaborating Visitor process described in these guidelines and typically occurs concurrently to the Collaborating Visitor process.

Once an invitation letter has prepared, the host department, via the department's designated Foreign Scholar Coordinator, should contact CMU's Office of International Education (OIE) to begin the visa document process. OIE should also be contacted if the Collaborating Visitor is in the U.S. in another immigration status in order to determine if that status is appropriate for a stay at CMU or if there are questions regarding which status is most appropriate for the visit. Additional information regarding the University's Exchange Visitor J-1 Visa Program is at <http://www.Carnegie Mellon.edu/oie/forscho/j1/info.html>.

The timelines noted in the Collaborating Visitor Process Summary in Section III should be followed closely to ensure your Collaborating Visitor is processed, approved, and has the required documentation (including a Visa, if required) prior to their visit to CMU.

All questions about the process should be addressed with CMU Collaborating Visitor Support at: visitor-support@andrew.cmu.edu

Section 2: Centralized Processing of All Collaborating Visitor Requests

Step 1: CMU Collaborating Visitor Support Response

CMU staff and faculty that submit a Collaborating Visitor request to CMU Collaborating Visitor Support will receive an initial automated email acknowledging the Collaborating Visitor request immediately after the request has been received.

Step 2: CMU Collaborating Visitor Support Review of Submitted Documents

CMU Collaborating Visitor Support will triage the information and documentation submitted to initiate a Collaborating Visitor request by reviewing the following information:

1. That all required documents and information outlined in Section 1 are present and complete.
2. The information on the completed Collaborating Visitors Questionnaire to:
 - Confirm that Collaborating Visitor status is appropriate. The information on the questionnaire will help to determine whether someone can be invited as a Collaborating Visitor, or whether they need to be given a paid appointment at CMU. In order to determine whether someone should be treated as an employee, the University needs to understand with particularity what the individual will be doing while on campus. Thus, providing complete information on the questionnaire is critical.
 - Determine which CMU departments are impacted to trigger the appropriate departmental reviews of the Collaborating Visitor request.
 - Conduct Restricted Party Screening (RPS) on all Collaborating Visitors, their home institutions/organizations/companies, affiliations, and funding sources, if applicable. The RPS ensures that CMU is not inviting a Collaborating Visitor whose name appears on any U.S. export denial, debarment, and blocked persons list. This also applies to their home institutions, affiliations, and funding sources. CMU, as a U.S. institution, is prohibited from exporting or providing services of any kind to any restricted parties on U.S. lists.

If a Collaborating Visitor request is missing information or a Collaborating Visitor is incorrectly categorized, CMU Collaborating Visitor Support will contact the CMU faculty or staff host for more information or discussion.

If a Collaborating Visitor and/or any of their affiliated organizations are found to be a true match on a U.S. restricted party list, the request will be immediately escalated to ECG for export compliance review and recommendation prior to any further processing of the Collaborating Visitor request.

The turnaround timelines on the Collaborating Visitor requests are heavily dependent on the information provided to CMU Collaborating Visitor Support upfront. Complete information and documentation at the time of initial request allows for a faster processing of requests.

Step 3: CMU Collaborating Visitor Support's Formal Acknowledgement of a Collaborating Visitor Request & Request for Review from Impacted CMU Departments

When the complete information and appropriate categorization of a Collaborating Visitor has been received by CMU Collaborating Visitor Support, they will: 1. send a formal acknowledgement email to the faculty/staff host with a case number; and 2. identify and notify impacted CMU departments for their required reviews. These departments and reviews include, but are not limited to:

- Export Compliance Group (ECG) in the Office of Research Integrity and Compliance (ORIC) is ALWAYS impacted.
- Office of Sponsored Programs (OSP): To the extent that the Collaborating Visitor is working on any CMU externally sponsored projects, they should either be (1) acting on behalf of their home institution under the terms of an agreement approved by OSP (2) participating as a CMU unpaid intern and is approved by OSP to participate in the externally sponsored project, or (3) they should be paid by CMU as employees for their work on the externally sponsored projects.
- Office of General Counsel (OGC)
- Human Resources (HR)
- Office of International Education (OIE)

The particular details of a Collaborating Visitor relationship vary greatly on a case by case basis. Depending on the circumstances of each visit, specific issues may require review and/or approval by other departments at CMU with particular subject matter expertise. Common issues include compliance with sponsored research agreements, intellectual property issues, labor and employment issues, and immigration issues.

CMU Collaborating Visitor Support sends all completed Collaborating Visitor Questionnaires and CV/Resumes to ECG for an export compliance review. The export compliance review ensures that CMU is in compliance with U.S. export regulations, which may restrict or prohibit certain types of information sharing, financial transactions, and dealings with certain individuals, organizations, and individuals from certain countries for reasons of national security.

If a Collaborating Visitor, their home institution, any current affiliations, and/or funding sources appear on any U.S. restricted party list or if an export license is required for a Collaborating Visitor to collaborate at CMU, ECG submits the facts and a request to the Vice Provost for Research, CMU's Office of General Counsel, and the Department Head or Dean for their approval or denial to pursue an export license from the appropriate U.S. Government agency in advance of the visit.

RPS and export compliance reviews of all Collaborating Visitor requests are important as there are potentially significant civil and criminal, personal and institutional penalties for violating U.S. laws and export regulations. These reviews prior to issuing invitations or offer letters prevents the need for withdrawal of offers should there be export issues associated with the Collaborating Visitor, their home institution, current affiliations, funding sources and/or proposed scope of collaboration at CMU under U.S. export regulations.

Step 4: CMU Impacted Department Questions

Each CMU impacted department may reach out to the CMU faculty/staff host in regards to departmental questions in regards to the Collaborating Visitor request.

If OSP is an impacted CMU department on a case, OSP will send any recommended custom language for Collaborating Visitor Invitation Letters and/or recommended category for the Collaborating Visitor Agreement directly to the faculty/staff host, copying CMU Collaborating Visitor Support.

Step 5: Final Determinations

All CMU impacted departments will send their final determinations (together with any custom language or documents recommended for the Collaborating Visitor) to CMU Visitor Support.

CMU Collaborating Visitor Support will provide a collective response to the CMU faculty/staff host.

Step 6: CMU Collaborating Visitor Support Response

CMU Collaborating Visitor Support will send the CMU faculty/staff host one of the following responses:

1. An approval, which is an authorization for the faculty/staff host to issue a formal letter of invitation and Collaborating Visitor Agreement to the Collaborating Visitor. The approval email will request signed copies of both the Collaborating Visitor letter of invitation and agreement be sent back to CMU Collaborating Visitor Support (and OSP if it is a CMU impacted department). This is required for recordkeeping and to close the request.
2. A hold for any special permissions, such as an export license, that would significantly extend the turnaround time of a Visitor request; or
3. A denial with the stated reasoning and decision from the CMU impacted department, Vice Provost for Research, and/or Department Head or Dean.

Step 7: Required Applicable Documents

In order to extend an invitation to a Collaborating Visitor, there are two documents required: 1. A **formal letter of invitation** and 2. A Collaborating **Visitor Agreement**, both of which will need to be signed and returned. These documents are important because they establish the terms and conditions for the visit, including among other things: timeframe for the visit, title, non-employment status, no right to pay or benefits, privileges conferred during the visit, compliance with institutional policies (e.g., research misconduct, sexual harassment), compliance with the law, confidentiality, and ownership of intellectual property.

Required applicable documents include the following:

- Collaborating Visitor invitation letter template can be found at: <https://cms-staging.andrew.cmu.edu/research-office-2/visitors/documents/visitors-invitation-letter-template.DOC>
- Collaborating Visitor Agreement template can be found at: <https://cms-staging.andrew.cmu.edu/research-office-2/visitors/documents/visitor-terms-and-conditions-agreement-template.pdf>.

The Collaborating Visitor categories on the Collaborating Visitor Agreement are as follows:

1. Student Visitor: A visiting student enrolled at a non-profit educational institution other than CMU.
 2. Academic/Non-Profit Visitor: Visiting employee from a non-profit educational institution or 501(c)(3) nonprofit organization.
 3. Company Visitor: Visiting employee of a company/organization (other than a 501(c)(3) nonprofit organization).
 4. Other (An explanation is required for this choice.)
- Unpaid interns should be issued an offer letter approved by HR in lieu of a Collaborating Visitor invitation letter and Collaborating Visitor Agreement. Template offer letters for unpaid interns are available at <https://www.cmu.edu/hr/internship/index.html> All unpaid interns are required to have a completed [Prospective Intern Information Form](#) entered into their Workday record.

- If the unpaid intern will work on an externally sponsored project, OSP must review and approve the offer letter.
- If the individual is collaborating on CMU externally sponsored projects on behalf of his or her home institution, then you must consult with OSP to assure that there is an appropriate agreement or other documentation in place. In such cases, additional or revised documentation may be needed on a case by a case basis.
- A Collaborating Visitor Agreement (or other appropriate documentation specified by CMU Collaborating Visitor Support) must be signed before the start of the Collaborating Visitor relationship.
- All signed forms must be returned to CMU Collaborating Visitor Support in a reply all email to the original approval email to ensure that any other CMU impacted departments receive signed copies of the required documents.

V. Additional Considerations for Collaborating Visitors

Requirements for Visitors to SEI

Contact SEI directly to discuss their requirements for Visitors to SEI.

Requirements for Visitors to NREC

Contact NREC directly to discuss their requirements for Visitors to NREC.

Minor Visitors

CMU discourages faculty and departments from inviting Visitors (including unpaid interns) who are under the age of 18. Any faculty member or department that invites a Visitor under the age of 18 must ensure that the supervisor and any other personnel who routinely interact with the minor Visitor has obtained the background certifications required by the Pennsylvania Child Protective Services Law, as amended by Act 153. In addition, the parents / legal guardians of the individual must sign any required documentation (e.g. offer letter and Visitor Agreement). Finally, departments engaging with Visitors who are under the age of 18 must register the internship program with the Assistant Vice Provost for Educational Outreach and comply with the Policy on the Protection of Children in CMU Programs, Facilities and Activities.

- CMU Policy on the Protection of Children in CMU Programs, Facilities and Activities: <http://www.Carnegie Mellon.edu/policies/administrative-and-governance/minors-on-campus.html>;
- CMU Child Protection website and registration forms: <http://www.Carnegie Mellon.edu/child-protection/>.

Access to CMU Confidential Information and/or Third Party Data, Materials or Information

It is important to note on the CMU Collaborating Visitor Questionnaire whether or not faculty/staff or a department intend to provide CMU confidential information, and/or another party's data, material or information to a Collaborating Visitor. The provision or disclosure of such data, materials or information to any Collaborating Visitor is subject to the terms of any agreement between CMU and the provider of the data, material or information ("Provider"). Such an agreement may prohibit CMU from giving a Collaborating Visitor access to or use of the Provider's data, materials or information, or it may require that CMU obtain Provider's permission before such disclosure to a Collaborating Visitor. In the event the Provider does not grant CMU the right to share its information with a Collaborating Visitor, and the purpose of the visit is dependent on the Collaborating Visitor's access to such information, the faculty/staff host

should be prepared to either withdraw the Collaborating Visitor request, or provide the Collaborating Visitor with access to alternative non-confidential data, materials or information.

Collaborating Visitor Work under an Existing Agreement

If the purpose of the Collaborating Visitor request is for the Collaborating Visitor to work under an existing agreement to which CMU is a party, such as sponsored research or a consortia agreement, OSP will have to review the terms of the existing agreement to determine whether such Collaborating Visitor work is permissible. OSP may be required to revise the terms of the template Collaborating Visitor invitation letter or change the CMU Collaborating Visitor Agreement to accommodate the obligations of an existing agreement. In the event OSP determines that the existing agreement prohibits the Collaborating Visitor from participating in any work occurring under that agreement, the faculty/staff host should be prepared to either withdraw the Collaborating Visitor request, or provide the Collaborating Visitor with alternative work.

Workplace / Lab Safety

Appropriate safety training should be provided to all Collaborating Visitors based on the tasks they will be performing while resident at the university. Please contact the Environmental Health & Safety Department for assistance with this training at: <https://www.cmu.edu/ehs/>.

Foreign Corrupt Practices Act (FCPA)

The FCPA prohibits any offer or provision of “anything of value” to a “foreign official” for the purpose of obtaining or retaining any form of business. Guidance regarding the FCPA is available at <http://www.Carnegie Mellon.edu/ogc/fcpa/>.

- Departments should use care and be mindful of any situation where a Collaborating Visitor position is offered or provided to a “foreign official.” The term “foreign official” is defined broadly and includes not only employees of foreign governments but also employees of entities that are owned or controlled by a foreign government. For example, many foreign institutions of higher education are controlled by the government and employees of such institutions, including professors, are generally considered “foreign officials” under the FCPA.
- If a department normally charges a fee for a Collaborating Visitor position, the waiver of such fee could be considered a gift, equivalent to the value of the fee that is normally assessed. The waiver of a Collaborating Visitor fee for any foreign official should be reviewed and approved by the Office of the General Counsel prior to any such waiver.
- Questions regarding the application of the FCPA to Collaborating Visitor relationships may be addressed to the Office of the General Counsel.