

PI Name: _____

Project Title: _____

ANNEX A

CRITERIA QUESTIONNAIRE

- 1) Will the direct costs of the project exceed \$1 million per year and will at least 50% of such costs be expended outside the United States (either directly or through one or more subcontracts)?

- 2) Will the project involve ongoing University operations in a non-U.S. country, such as the establishment of an office, leasing of space or an on-the-ground presence for more than a minimal period?

a) If yes, for what period of time? _____

- 3) Will the project be located in, funded by, or involve travel to or collaboration with a country, or persons in a country, on the Treasury Department's Office of Foreign Assets Control list of sanctioned countries? If YES, what country?

Will the project involve any transactions, whether compensated or uncompensated, with any restricted parties (i.e., individuals or entities on a U.S. Government restricted party list)? If YES, please identify the party in question.

The list of sanctioned countries is available at <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>. The lists of restricted parties are available at <https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern>. (For assistance with screening, please contact SPA.)

- 4) Will the project involve (or has it involved at any stage, including during the pre-proposal stage) the payment, promise to pay or authorization to pay money or "anything of value" to any of the following entities (or to any officers, employees, or representatives of any of the following):

- a) a government, or a department, agency or instrumentality of a government,
- b) a political party or candidate for political office,

- c) a public international organization (such as the United Nations or World Bank), or
- d) any other person or organization at the request of any government official?

This Criterion applies to subcontracts, subawards, and other contracts with any entities or persons identified above. This Criterion also applies to payments to any person who will in turn offer, promise or make a payment to any entity or persons identified in clauses (a) – (d). An “instrumentality” of a government includes state-owned or state-controlled entities, which can include (as examples) universities, banks, and energy and transportation companies.

“Anything of value” includes cash, fees, travel expenses, gifts, educational or executive training expenses, promises of future employment, reimbursements and other services or items of any value. “Anything of value” does not, however, include the conveyance of Columbia’s results to the sponsor under the project agreement.

- 5) Will the project involve the use of high risk materials (e.g., radioactive materials or certain biologic pathogens)?

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- 6) Will the project receive funding from, or involve collaboration with, entities in either Saudi Arabia or Qatar? If yes, please identify the source of funding and the nature of the collaboration.

This question applies to projects receiving direct funding or in-kind contributions from any governmental, quasi-governmental, private, or corporate entities based in Saudi Arabia or Qatar. It also encompasses collaborations with academic institutions, businesses, and other organizations located within Saudi Arabia or Qatar.

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- 7) Will the project receive funding from, or involve collaboration with, entities in Foreign Countries of Concern (“FCOC”), i.e. China, Iran, North Korea, or Russia? If yes, please specify the country, the source of the funding, and the nature of the collaboration.

This question addresses projects associated with countries identified by the U.S. Government in the Chips & Science Act of 2022 as “Foreign Countries of Concern” (FCOCs), currently China, Iran, North Korea, and Russia. This includes direct or indirect financial transactions, collaborations, or exchanges of research material or data with entities in these countries.