

Everything you always wanted to know...

March 2026

Naomi Schrag

Vice President for Research Compliance, Training and Policy

Columbia University Mission

“Columbia University ... seeks to attract a diverse and international faculty and student body, to support research and teaching on global issues, and to create academic relationships with many countries and regions. It expects all areas of the University to advance knowledge and learning at the highest level and to convey the products of its efforts to the world.”

<https://www.columbia.edu/content/about-columbia>

Research Security

“[S]afeguarding the research enterprise against behaviors aimed at misappropriating research and development to the detriment of national or economic security, related violations of research integrity, and foreign government interference.”

Guidance for Implementing National Security Presidential Memorandum (NSPM) 33 on National Security Strategy for United States Government-Supported Research and Development (2022)

“Importantly, federal research agencies should implement research security policies in a way that treats everyone equally under law, without xenophobia, prejudice, or discrimination.... The law also requires that research security activities be carried out in a manner that does not target, stigmatize, or discriminate against individuals on the basis of race, ethnicity, or national origin.”

Guidelines for Research Security Programs at Covered Institutions issued by White House Office of Science and Technology Policy (July 9, 2024)

[3]

Federal Concerns about Research Security

Starting in 2018, funding agencies began to express concern about “undue foreign influence” on the U.S. research enterprise. Concerns include:

- Researchers’ failure to disclose resources for research at non-U.S. universities
- Diversion of intellectual property, intellectual capital and know-how developed with federal funding
- Scientific, budgetary or commitment overlap (“double-dipping”)
- Conflict of commitment, i.e. limited capacity to conduct U.S.-funded research
- Breach of confidentiality of peer review

Concerns continue to be voiced by members of Congress from both parties and addressed repeatedly in legislation to fund research.

Research Security “Foreign Countries of Concern”

- CHIPS & Science Act identified four “Foreign Countries of Concern” (FCOCs)
 - China, Iran, North Korea and Russia
- Activities involving FCOCs are higher risk. Research Compliance and Training can provide guidance.

U.S. Economic Sanctions

Sanctions programs administered by the Treasury's Office of Foreign Assets Control (OFAC)

- Comprehensive Sanctions: Impose broad-based trade restrictions on a country/region
 - **CUBA, IRAN, NORTH KOREA, RUSSIA, and CRIMEA, DONETSK, LUHANK REGIONS OF UKRAINE**
- All activities involving a comprehensively sanctioned country or region must be escalated to RCT for review prior to the start of activities
 - Government licenses are required for activities with entities/ individuals located in comprehensively sanctioned countries/regions
- Limited Sanctions: Target and restrict dealings with sanctioned entities/individuals (SDNs) on OFAC's sanctions lists
 - Limited Sanctions Programs available on RCT's website: <https://research.columbia.edu/economic-sanctions-and-restricted-parties>

Other Restricted Party Lists

Other U.S. agencies maintain “restricted party lists”

- Transactions with “restricted parties” are subject to restrictions
- Restrictions vary depending on the list, but may include:
 - Entering into contracts, agreements, research arrangements
 - Exports/imports
- Certain foreign universities and research institutes are subject to OFAC or other federal restrictions
 - Screen foreign universities/ entities against “restricted party lists” to determine whether OFAC or other federal restrictions apply
 - Visual Compliance: Columbia’s an online “restricted party screening” platform

Visual Compliance Screening

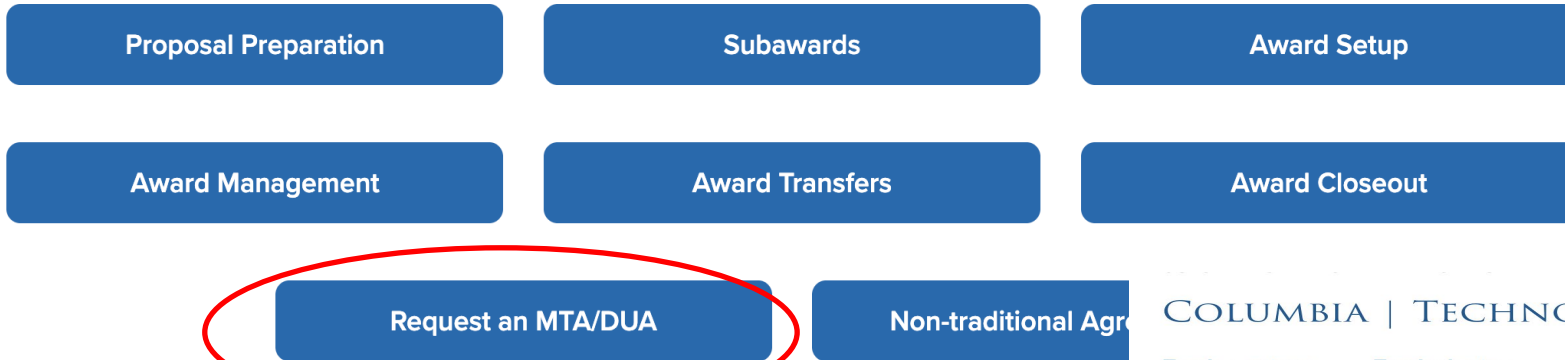
- Two ways to screen using Visual Compliance:
 - 1) Email research-compliance@columbia.edu
 - RCT will screen and send you the results with an explanation of the restrictions
 - 2) Open a Visual Compliance account
 - All members of the Columbia community can open a Visual Compliance account.
 - To request access, email research-compliance@columbia.edu
 - RCT will send instructions and provide training
- Screening foreign collaborators prior to the start of activities helps avoid surprises later on

Sharing Materials or Data

- “Investigators ... frequently develop unique research resources. NIH considers the sharing of such unique research resources (also called research tools) an important means to enhance the value of NIH-sponsored research.”
- But sharing materials or data with restricted entities or entities in FCOCs may create legal and research security risks.
- Use a Material Transfer Agreement or Data Use Agreement – recipients will be screened behind the scenes and any restricted party issues will be addressed.

Request an MTA/DUA

SPONSORED PROJECTS AND RESEARCH LIFECYCLE



<https://techventures.columbia.edu/>

<https://spa.columbia.edu>

COLUMBIA | TECHNOLOGY VENTURES

For Inventors ▾ For Industry ▾ Search Available Technologies Lab-to-Market About CTV ▾

News and Events ▾ Media ▾

100+ licenses & options

20+ start-up companies

Millions in licensing revenue

Submit An Invention Request an MTA or CDA Funding Opportunities Search Technologies Collaborate With Columbia

[10]

Malign Foreign Talent Recruitment Programs

- Researchers who participate in MFTRPs are **ineligible** to serve as senior/key personnel on federal awards.
- Definition of MFTRP includes 3 elements:
 1. Foreign Country of Concern
 2. Compensation to the participant – but need not be cash; and
 3. Certain obligations or expectations of participant that would violate federal or University policy

[11]

Disclosure is Fundamental to Research Security

- Major federal focus on accuracy and completeness of researcher disclosures in **Biographical Sketch and Current and Pending (Other) Support**.
- Funding agencies use these disclosures for, among other things, conducting research security risk assessments
- Disclosure requirements are broad.
- Err on the side of disclosure if you are uncertain

[12]

Researchers Must Certify to Accurate Disclosures

- CPOS and Biosketch: “*I certify that the information provided is **current, accurate, and complete**.... I also certify that, at the time of submission, I am not a party in a malign foreign talent recruitment program.*”
- Biosketch: “This includes but is not limited to information related to **domestic and foreign appointments and positions**. “
- Knowingly certifying to inaccurate information may have serious consequences, including but not limited to
 - Heightened sponsor requirements to ensure disclosures are complete and accurate
 - Funding restrictions or de-funding
 - Civil or criminal prosecution

What needs to be disclosed to funding agencies?

- Broad disclosure is required, beyond current awards and pending proposals. For example, researchers must disclose:
 - Certain outside consulting
 - In-kind contributions that support research, including, e.g., space, materials, personnel, with a value of \$5k or more and requiring a time commitment
 - Certain gifts
 - All professional affiliations over the past 3 years
 - All appointments, including part-time and voluntary or honorary appointments
 - And more

Disclosure of Consulting

- “**Consulting activities** must be disclosed under the proposals and active projects section of the form when any of the following scenarios apply:
 - The consulting activity will require the senior/key person to perform research as part of the consulting activity;
 - The consulting activity does not involve performing research, but is related to the senior/key person’s research portfolio and may have the ability to impact funding, alter time or effort commitments, or otherwise impact scientific integrity; or
 - The consulting entity has provided a contract that requires the senior/key person to conceal or withhold confidential financial or other ties between the senior/key person and the entity, irrespective of the duration of the engagement.”

https://www.nsf.gov/bfa/dias/policy/researchprotection/commonform_cps.pdf

[15]

Consulting Agreement Template Addendum

COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK

COLUMBIA RESEARCH

About ▾ Compliance ▾ Find Funding ▾ Offices ▾ Resources ▾ Safety ▾ T

[Home](#) Faculty Consulting

Faculty Consulting

The University expects that an officer's outside activities and interests will not interfere with his or her teaching, scholarly research, or other obligations to the University. Within this general framework, officers of instruction are permitted to engage in outside consulting activity up to 20 percent of the time in which they are expected to provide services to the University.

The University advises all faculty members to include certain terms as an addendum to their consulting agreements to ensure compliance with University policies. This addendum is available [here](#).

<https://research.columbia.edu/faculty-consulting-1>

COLUMBIA UNIVERSITY

FACULTY CONSULTING OR OTHER EXTERNAL PROFESSIONAL ACTIVITY

AGREEMENT ADDENDUM

1. This Addendum to the Agreement ("Agreement") between _____ ("Entity") and _____ ("Consultant") sets forth additional terms and conditions to the Agreement.
2. Entity understands and agrees that Consultant is an employee of Columbia University ("Columbia"), has pre-existing obligations to Columbia, and that Consultant's primary professional responsibility is to Columbia, including to its education, research, and clinical programs. Entity further understands and agrees that neither Consultant's services under the Agreement nor the Agreement itself may restrict Consultant's ability to conduct current or foreseeable research, teaching or clinical responsibilities or activities at Columbia, nor limit Consultant's ability to publish work generated at or on behalf of Columbia.
3. Entity understands and agrees that Consultant must comply with Columbia policies and the laws, regulations, policies, and/or contractual terms of research sponsors at Columbia including, but not limited to, disclosure of this Agreement to Columbia and such sponsors, and privacy and anti-corruption laws, regulations and policies.
4. Entity understands and agrees that any listing of Consultant on any publication resulting from Consultant's activities for Entity that references Consultant's affiliation with Columbia must include the following disclosure: "*Dr./Professor/Title [Name]'s contribution to this publication was done in their individual capacity, as a paid consultant, not in connection with their Columbia University duties or responsibilities.*" Entity and Consultant further understand and agree that Consultant must also make such disclosure at any speaking engagements related to the services Consultant provides under the Agreement.
5. Entity understands and agrees that Consultant may not use any confidential, intellectual property, or other proprietary information owned by Columbia or acquired in the context of Consultant's employment at Columbia in the Consultant's provision of services to Entity.
6. Entity understands and agrees that Contractor is obliged to assign and has pre-emptively assigned to Columbia all of Contractor's rights in intellectual property resulting primarily from the use of Columbia facilities or from the activities of Consultant while engaged in services to Columbia. Company has no rights to or licenses under any intellectual property that is subject to Contractor's employment-related obligations to Columbia. Company further acknowledges that Contractor has no authority to assign, license, or otherwise transfer any rights in any Columbia inventions or intellectual property.
7. Entity understands and agrees that an invention made by Consultant in the course of this Agreement may be assigned to Entity only if it is unrelated to the activities for which

Disclosure of Certain Gifts

- Gifts are resources provided where there is no expectation of anything (e.g., time, services, specific research activities, money, etc.) in return.
- As a result, if the terms of a gift include, specific research aims and objectives, intellectual property rights, require a time commitment or activity, or require reporting progress to the donor, then the gift must be disclosed in Current and Pending (Other) Support.
- This includes even small gifts where there is no formal gift agreement but the parties have an informal understanding that the donor will receive something specific in exchange for the gift.
- If a researcher is not sure whether to include a particular gift, we strongly recommend erring on the side of disclosure and including it.

Funding Agency Risk Assessments

- Funding agencies compare CPOS and Biosketch information to publicly available information
 - Publications
 - Websites
 - U.S. Patent & Trademark Office
 - LinkedIn
 - Etc.

New DoW Research Security Risk Matrix

Table 1: Decision Matrix to Inform Fundamental Research Proposal Mitigation Decisions
Factors for Assessing a Covered Individual's Affiliations, Collaborations, and Funding

	Factor 1: Foreign Talent Recruitment Programs	Factor 2: Funding Sources	Factor 3: Patents	Factor 4: Entity Lists
Prohibited factors	Indicator(s) ¹ of the covered individual actively participating ² in a malign foreign talent recruitment program (MFTRP).	None	None	Active collaboration for the specific purpose of fundamental research ³ between a covered individual and any academic institution ⁴ or entity, or employee of such entity, on the current Prohibited Entity Lists. or Funding of or to an entity on any of the Prohibited Entity Lists, or employees of such entities.
Mitigation measures required	<p>Within the past 5 years:</p> <p>Indicator(s) of participation by the covered individual in an MFTRP meeting any of the criteria defined in section 10638(4) of the CHIPS and Science Act of 2022.</p> <p>or</p> <p>Covered individual's co-author(s)⁵ on publications in scientific and engineering (S&E) journals are participants in an MFTRP meeting any of the criteria defined in section 10638(4) of the CHIPS and Science Act of 2022.</p>	<p>Within the past 5 years:</p> <p>Indicator(s) that the covered individual received funding from a Foreign Country of Concern (FCOC) or Foreign Entity of Concern.</p>	<p>Within the past 5 years:</p> <p>Patent application(s) or patent(s) that resulted from research funded by the United States Government (USG) that were filed in an FCOC, or on behalf of an FCOC-connected entity, prior to filing in the U.S.</p> <p>or</p> <p>Patent application(s) or patent(s) <u>not disclosed</u> in proposal that resulted from research funded by the USG that were filed in a non-FCOC, or on behalf of an entity in a non-FCOC, prior to filing in the United States.</p> <p>or</p> <p>Patent or Co-patent(s) applications(s) with an individual affiliated with any entity on the version at the time of review of any Prohibited Entity Lists.</p>	<p>Within the past 5 years:</p> <p>Indicator(s) of affiliation with an entity on any Prohibited Entity List at the time of review.</p> <p>or</p> <p>Covered individual's co-author(s) on publications in S&E journals are affiliated with an entity on any Prohibited Entity List at the time of review.</p>
No mitigation needed	<p>Within the past 5 years:</p> <p>No indicator(s) of participation by the covered individual in an MFTRP meeting any of the criteria defined in section 10638(4) of the CHIPS and Science Act of 2022.</p>	<p>Within the past 5 years:</p> <p>No indicator(s) that the covered individual has received funding from an FCOC or an FCOC-connected entity.</p>	<p>Within the past 5 years:</p> <p>All patent applications or patents resulting from research funded by the USG have been filed in the United States prior to filing in any other country. No patent or co-patent(s) applications with an individual affiliated with any entity on any Prohibited Entity Lists.</p>	<p>Within the past 5 years:</p> <p>No indicator(s) of any affiliation with an entity on a current Prohibited Entity Lists.</p> <p>No indicator(s) that a covered individual's co-author(s) on publications in S&E journals are affiliated with an entity on a Prohibited Entity list.</p>

- Active collaboration with Prohibited Entities is prohibited
- Mitigation required for coauthorships with individuals affiliated with Prohibited Entities over past 5 years

NIH Decision Matrix

FOIA(b)(7)(C)

Rating	Factor 1: Foreign Talent Recruitment Program ^{4,5}	Factor 2: Foreign Funding ^{6,7}	Factor 3: Affiliation with Foreign Institutions or Entities ^{6,8}
<p>Mitigation measures required.</p> <p>Contact recipient institution for more information.</p>	<p>Indicators of active (ongoing) participation in a malign foreign talent recruitment program (MFTRP) meeting any of the criteria in Sec. 10638(4)(A)(i)-(ix) of the CHIPS and Science Act of 2022.</p> <p>[Note: this factor/rating is automatically disqualifying]</p>	<p>Indicators of undisclosed or incompletely disclosed active (ongoing) funding from a Foreign Country of Concern (FCOC) or an FCOC-connected entity</p>	<p>Indicators of an undisclosed or incompletely disclosed active (ongoing) affiliation with an institution or entity located in or connected to a Foreign Country of Concern (FCOC).</p>
<p>Mitigation measures recommended.</p> <p>Contact recipient institution for more information.</p>	<p>Within the past 5 years: Indicators of past participation in a malign foreign talent recruitment program (MFTRP) meeting any of the criteria in Sec. 10638(4)(A)(i)-(ix) of the CHIPS and Science Act of 2022.</p> <p>Or</p> <p>Indicators of undisclosed or incompletely disclosed active (ongoing) participation in a foreign talent recruitment program (FTRP) meeting any of the criteria in Sec. 10638(4)(A)(i)-(ix) of the CHIPS and Science Act of 2022</p>	<p>Within the past 5 years: Indicators of undisclosed or incompletely disclosed past funding from a Foreign Country of Concern (FCOC) or an FCOC-connected entity.</p> <p>Or</p> <p>Indicators of undisclosed or incompletely disclosed active (ongoing) funding from a foreign country or foreign entity that is <u>not</u> a Foreign Country of Concern (FCOC) or an FCOC-connected entity.</p>	<p>Within the past 5 years: Indicators of undisclosed or incompletely disclosed past affiliation with an institution or entity located in or connected to a Foreign Country of Concern (FCOC).</p> <p>Or</p> <p>Indicators of an undisclosed or incompletely disclosed active (ongoing) affiliation with an institution or entity located in or connected to a foreign country that is <u>not</u> a Foreign Country of Concern (FCOC).</p>
<p>Mitigation measures suggested.</p> <p>Consider contacting recipient institution.</p>	<p>Within the past 5 years: Indicators of undisclosed or incompletely disclosed past participation in a foreign talent recruitment program (FTRP) meeting any of the criteria in Sec. 10638(4)(A)(i)-(ix) of the CHIPS and Science Act of 2022.</p>	<p>Within the past 5 years: Indicators of undisclosed or incompletely disclosed past funding from a foreign country or foreign entity that is <u>not</u> a Foreign Country of Concern (FCOC) or an FCOC-connected entity.</p>	<p>Within the past 5 years: Indicators of an undisclosed or incompletely disclosed past affiliation with an institution or entity located in or connected to a foreign country that is <u>not</u> a Foreign Country of Concern (FCOC).</p>

- “Within the past 5 years: Indicators of past participation in a malign foreign talent recruitment program (MFTRP).... or [i]ndicators of **undisclosed or incompletely disclosed active** (ongoing) participation in a foreign talent recruitment program (FTRP) meeting any of the criteria ... of the CHIPS and Science Act of 2022”
- “Within the past 5 years: Indicators of undisclosed or incompletely disclosed past funding from a Foreign Country of Concern (FCOC) or an FCOC-connected entity [o]r [i]ndicators of **undisclosed or incompletely disclosed** active (ongoing) funding from a foreign country or foreign entity that is not a Foreign Country of Concern (FCOC) or an FCOC-connected entity.”
- “Within the past 5 years: Indicators of undisclosed or incompletely disclosed past affiliation with an institution or entity located in or connected to a Foreign Country of Concern (FCOC) [o]r [i]ndicators of an **undisclosed or incompletely disclosed** active (ongoing) affiliation with an institution or entity located in or connected to a foreign country that is not a Foreign Country of Concern (FCOC).”

<https://nexus.od.nih.gov/all/2024/08/15/new-decision-matrix-further-clarifies-nih-processes-for-handling-allegations-of-foreign-interference/>

Coauthorship

- NIH: “collaborations expected to result in co-authorship within the context of the proposed NIH award” may constitute foreign components of the award that require prior approval, if they include a foreign co-author and will acknowledge NIH funding.
- DoW: coauthorship with participants in MFTRPs or who are members of Prohibited Entities is a risk where mitigation is required.

Foreign Travel

- Currently, no federal-wide requirement to report all foreign travel or obtain prior approval
 - Columbia requires registration with ISOS.
 - Sponsored travel must be disclosed in Rascal.
 - Sponsored foreign travel **for purpose of conducting research** must be disclosed in Current and Pending (Other) Support
- Starting sometime in 2026, some business travel will need to be reported, “when a federal research agency has determined that security risks warrant travel reporting in accordance with the terms of an R&D award.”
 - Some DoD agencies currently require reporting of personal and business travel, for some projects.
- Institutions will also have to implement training on travel security at least every 6 years.

Research Security Training

- All federally funded researchers must complete mandatory research security training.
- NSF, DOE have already implemented this requirement.
- For NIH, as of May 25, 2026, all Senior/Key Personnel listed on NIH proposals will need to certify to training completion within 12 months of application submission.
- Columbia has adopted a nationally-developed, NSF-funded training, recognized by NIH as compliant.
- Complete training through **Rascal, course no. TC7550.**

[23]

4 Ways to Mitigate Research Security Risk

1. Know your collaborators: for non-U.S. collaborators, especially those based in or affiliated with entities in FCOCs, email research-compliance@Columbia.edu for guidance.
2. Err on the side of disclosure. If you are not sure whether to include an activity in CPOS or biosketch, include it.
3. Use MTAs and DUAs for any material and data transfers, especially if to/from outside the U.S.
4. Ask for guidance. If you have any questions, contact your SPA project officer or research-compliance@columbia.edu.

research.columbia.edu

COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK

COLUMBIA RESEARCH

Home - Directory - Calendar

About - Compliance - Find Funding - Offices - Resources - Safety - Training - Initiatives

About the Office Directory

I WANT TO

- Connect to Rascal
- Locate Contact Information
- Locate Handbooks and Policies
- Sign Up for Trainings
- Find Funding Opportunities
- Find Postdoc Resources

HIGHLIGHTS

- Promoting Harassment-Free Research Environments
- Postdoc and Associate Research Scientist/Scholar Unionization
- Center Grant Proposal Development
- Science & Security: A resource for the Columbia community**
- Undergraduate Research Opportunities

FAQs: Common Questions regarding International Engagements

The U.S. Government restricts what U.S. persons (including Columbia University's faculty, staff, students and visitors) can do with certain entities, individuals, and countries. Depending on the applicable laws and regulations, these restrictions may constrain or prohibit common academic and educational activities and collaborations. For this reason, it is important to consult with Columbia's [Office of Research Compliance and Training](#) (RCT) before the proposed international engagement starts if it potentially involves a "restricted" university or other entity, or if any of the activities (in-person or remote) will take place in a comprehensively sanctioned country, or if you are not certain.

Frequently Asked Questions

RESEARCH SECURITY TOPICS

Researcher Disclosure Requirements

U.S. Export Controls, Economic Sanctions and "Restricted Parties"

Prohibition on Certain Telecommunications Equipment (NDAA 889)

International Travel & Data Security

Protection of Intellectual Property

NASA Restriction on Funding Activities with China

Visiting Scholars and Scientists

ByteDance/Tik Tok Prohibition

Foreign Talent Recruitment Programs (FTRPs) and Malign FTRPs

Lab Tours

Peer Review

Back to Top

Everything you always wanted to know...

Stephanie Scott

Director of Policy & Research Development

Sponsored Projects Administration (SPA)

stephanie.scott@columbia.edu

Everyday Scenarios – When and How to Disclose

- Visitors – includes visiting scholars/postdocs/students, and independent researchers
- Postdocs/Students who leave your lab, obtain new positions abroad, but collaboration continues
- Being asked to be an ‘advisor’ or unfunded investigator/collaborator in a foreign entity’s proposal / Asked to co-author a paper with collaborators outside the U.S.
- Gifts vs. Grants
- External Appointments

Potential Visitor Reaches Out to Faculty

Email to Faculty member, might look something like this:

Dear Professor XX,

Good morning! Having read your publications, I am impressed by your expertise in the field of XXXXX. It is an honor for me to write to you in hope of visiting your distinguished University for one year.

My name is XXXX. As a XXXX in the Department of XXXXXX University/Hospital, I have experience in XXXXXX....

Please see my CV in the attachment for further details of my skills and publications.

To develop a broader mindset and bring my skills to a higher level, I plan to visit a medical center in New York for one year. Since you are a leading expert, I desire to assist with your research and observe your practice. Meanwhile, I will share with you major topics and challenges of XXXXX in XXXXX, exchanging my original perspectives and observation with you.

Questions to ask yourself first?

- **Due diligence:**
 - What do you know about this person?
 - What have they published?
 - Who are they affiliated with? What kind of an entity is it? Is it in a Foreign Country of Concern (FCOC)?
 - University, non-profit, military affiliation, for-profit company, foreign government involvement, etc.
 - Are they on the Restricted Parties List or DOW's Prohibited Entity Lists?
 - Ask dept contact first to screen in Visual Compliance, if unable to assist, contact research-compliance@columbia.edu
 - Is there any aspect of the request that seems unusual, unnecessary or poorly specified?
- **What will be the nature of the relationship?**
 - Mentor/Mentee?
 - Collaborating on research?
 - Visitor conducting their own research? (still need to supervise them)
 - Sponsoring and supervising visitor?

Questions to ask yourself first?

- How much time are you committing for the visitor?
- What information will you be sharing with the visitor?
 - May need a MTA, DUA, an NDA, etc.
- What sponsored projects will they be working on? Non-sponsored projects?
 - Will you need to update your existing IRB/IACUC protocols?
 - If conducting their own independent research, what resources will they be using? Will they need IRB/IACUC approval, and what is your involvement?
 - Time involved supervising or obtaining additional protocols
- How will they be supported financially? How much? How long will they be here?

Visitor Policies and Procedures

- Work with your Department Administrator to initiate the process and adhere to policies and procedures for visitors.
 - **Provost's Office:** <https://provost.columbia.edu/content/visitors>
 - **Office of Faculty Affairs (CUIMC):** <https://www.cuimc.columbia.edu/about-us/explore-cuimc/academic-affairs/office-faculty-affairs/visitors>
 - **ISSO:** <https://isso.columbia.edu/>
- All visitors who will be involved in research-related activities must comply with:
 - [Compliance and Training Requirements for Visitors Involved in Research Activities policy - 9/18/2023¹](#)
 - [Guidelines for Short-term Visitors in Research-Related and Clinical Activities - 6/15/2023](#)

Example of letter to a visitor

COLUMBIA UNIVERSITY
IN THE CITY OF NEW YORK
DEPARTMENT OF [REDACTED]

PERSONAL AND CONFIDENTIAL

[REDACTED]
[REDACTED]
[REDACTED]

There is a defined start date.

I am pleased to offer you an appointment as a part-time Staff Associate I in the Department of [REDACTED] at Columbia University, beginning [REDACTED], 2024. This offer comes with the enthusiastic endorsement of the Department and the approval of the [REDACTED]. I view your appointment as further enriching our academic

There is a beginning and end date of visit.

Indicates how visitor will be supported, and by whom. Also indicates dollar amount of support.

co [REDACTED]
Te [REDACTED]
Your appointment will be from [REDACTED] with [REDACTED] renewal, subject to work eligibility and the usual standards for satisfactory availability of funding. Your appointment is also contingent upon your being in the United States.

You have provided confirmation that you will receive a scholarship of [REDACTED] from the [REDACTED] [REDACTED] for your visit, which annualizes to [REDACTED]. It is our understanding that the scholarship is paid to you directly.

An explanation of the work being done, and the Columbia faculty member involvement.

Duties

We expect that you will work on the following research:

[REDACTED]

Visiting Scholars/Students/Postdocs Performing Research within Columbia with an associated time commitment from the person completing C&P:

Current and Pending (Other) Support Disclosures:

- Are there postdocs, students or visiting scholars funded by an outside institution **performing research activities in support of my research endeavors** (as opposed to a solely mentor/mentee arrangement with no research activities)? E.g., exchange students? Postdocs paid by home institution?
- Does the arrangement require a **time commitment** from the PI or senior/key person? If yes, then it must be disclosed in Current & Pending Support as an **In-kind Contribution if source of support is over \$5,000.**
- As soon as the commitment is made it is a **Pending** In-kind Contribution.
- Once they are here, it is an **Active** In-kind Contribution.
- Did you inadvertently not think to disclose? We have 30 days to disclose from when we discover it. [33]

What are In-kind Contributions?

- In this section, disclose ALL in-kind contributions **with an estimated dollar value of \$5000 or more** and that require a **commitment of the individual's time**.
- An in-kind contribution is a **non-cash contribution** provided by an external entity that **directly supports the individuals' research and development efforts**.
- An in-kind contribution may include but is not limited to: real property; laboratory space; equipment; data or data sets; supplies; other expendable property; goods and services; employee or student resources. In-kind contributions with an estimated value of less than \$5000 need not be reported.

[34]

Disclosures Table

- <https://www.nsf.gov/policies/nspm-33/disclosures>

Postdoctoral scholars, students or visiting scholars who are supported by an external entity, and whose research activities are intended for use on the project/proposal being proposed.	<ul style="list-style-type: none">• Facilities, Equipment and Other Resources
Postdoctoral scholars, students or visiting scholars who are supported by an external entity, whose research activities are not intended for use on the project/proposal being proposed and have an associated time commitment.	<ul style="list-style-type: none">• Current and Pending (Other) Support
Travel supported/paid by an external entity to perform research activities with an associated time commitment.	<ul style="list-style-type: none">• Current and Pending (Other) Support

When and How to Disclose in CPOS

- Disclosing involves including the visitor and activity on the Current & Pending (Other) Support (CPOS) form

Timing

- Next proposal submission
- Next RPPR submission
- During JIT
- Or a post-award disclosure if should have been disclosed earlier (30 days from discovery)
- Contact your SPA Project Officer to discuss
- A good best practice is to add the new in-kind contribution to CPOS as it happens so you don't forget about it, and it's ready when needed.

[36]

Example: Pending In-kind Contribution

***Status of Support:** Pending

***Source of Support:** University of Oxford

***Receipt (or Anticipated Receipt) Date of In-Kind Contribution: (MM/YYYY):** 07/2026

***Summary of In-Kind Contribution:** Visiting Scholar

***U.S. Dollar Value of In-Kind Contribution:** \$12,000

Person-Month(s) (or Partial Person-Months) Per Year Devoted to the In-Kind Contribution:

Year	Person Months
2026	0.25

***Overall Objectives:**

The short-term Visiting Scholar will be conducting research in my lab on XXX, and my time will be spent overseeing the scholar's work. We may collaborate on a paper. The scholar will be here from 7/1/2026 - 10/31/2026 (4 months). Scholar is receiving a stipend and funds for travel and lodging from University of Oxford. The scholar's research activities are not intended for use on this proposed project.

***Statement of Potential Overlap:**

None

Review Prior Approval Requirements: NIH Foreign Component

- The performance of any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, whether or not grant funds are expended. Activities that would meet this definition include, but are not limited to, (1) the involvement of human subjects or animals, (2) extensive foreign travel by recipient project staff for the purpose of data collection, surveying, sampling, and similar activities, or (3) any activity of the recipient that may have an impact on U.S. foreign policy through involvement in the affairs or environment of a foreign country. Examples of other grant-related activities that may be significant are:
 - collaborations with investigators at a foreign site anticipated to result in co-authorship;
 - use of facilities or instrumentation at a foreign site; or
 - receipt of financial support or resources from a foreign entity.
- Foreign travel for consultation is not considered a foreign component.

[38]

Postdocs/Students leave mid-project

- Postdocs/Students leave your lab, obtain a new position abroad
- The collaboration continues after postdoc/student leaves. May involve:
 - Continuation of data collection/research activities/working with human subjects
 - Data collection complete, but analysis continues
 - Analysis complete, but working with former postdoc/student on manuscript for publication (editing drafts, etc.)

[39]

May be a Foreign Component

- Adding a foreign component requires NIH prior approval *before* continuing to collaborate with the former postdoc/student.
- Communicate with SPA Project Officer (PO). SPA will review and provide next steps.
- Requires a formal, written letter to NIH Program Official and Grants Management Specialist.

[40]

Things to consider....

- Where will the former postdoc/student be located?
 - Which country?
 - Which entity?
 - Need to look at restrictions and sanctions
- Will there be a publication that acknowledges NIH funding?
- What CU resources will the individual need access to?
- Which activities will the individual be engaged in?
- Will a *new* 3rd party will be involved in the research (e.g., will the former postdoc/student be using facilities at the new local university)?
- Will additional financial support will be provided by the new foreign entity?
- Will data continue to be exchanged?
- Is a subaward required?
 - New subrecipients require prior approval for all federal agencies.
 - NIH no longer allows foreign subawards – may need to consider alternate options

[41]

Invited to be on a foreign proposal

Being asked to be an ‘advisor,’ ‘investigator,’ ‘team member,’ ‘consultant,’ or other type of unfunded investigator/collaborator on a foreign entity’s proposal.

Questions to ask:

- Are you being paid directly by the other entity? If yes...
 - See [Outside Interests and Employment in the Faculty Handbook](#).
- If no, are you getting something else of value?
 - Travel reimbursement
 - Other resources
 - These contributions could become in-kind contributions
- Is the intent to collaborate and co-author papers?
- Is there a time commitment on the proposal?

Current & Pending (Other) Support

- Even though you may be unfunded, if the intent is to collaborate on research, it must be included in Current & Pending (Other) Support
- It may be disclosed as a Project, or, the resources may be disclosed as In-kind Contributions. Depends on the role and the value of the contributions
- Estimate the effort and value

[43]

Gifts vs Grants

- Columbia Policy, [Distinguishing Gifts from Sponsored Projects](#)
- In general, gifts do not be in Current & Pending (Other) Support (CPOS)
- NIH's expectations of disclosure may be broader
- Any gifts that have grant-like characteristics must be disclosed in CPOS:
 - Commitments of effort, detailed milestones, being paid on a cost reimbursement basis, required reporting deliverables, etc.
- Err on the side of disclosure

[44]

Biosketch – Academic Appointments

Positions that are identified as personnel on research grants and cooperative agreements where the senior/key person is identified as affiliated with an institution of higher education or on an indexed publication.

Academic appointments and positions are those defined in institutional policy, and conveyed in a formal manner (e.g., via appointment letter, executed offer letter, employment contract), that relate to research, teaching, or associated scholarly activities at one or more foreign or domestic institutions.

Examples include but are not limited to assistant professor, associate professor, and professor; adjunct and affiliate faculty positions of all ranks; visiting faculty positions of all ranks; visiting scholar or instructor; clinical faculty position of all ranks; lecturer; research faculty position of all ranks; and emeritus faculty position of all ranks.

Also included are graduate research and teaching assistants at the master's and doctoral level, as well as post-doctoral scholars. Excluded from this definition are routine academic or university service activities, performed at the departmental, college or institutional level at one's primary or other collaborating institutions, such as serving on or chairing faculty or staff search committees, graduate student research or thesis committees, compliance committees, ad hoc task forces, graduate and undergraduate studies committees, capital improvement projects, or faculty governance committees.

[45]

Biosketch – Professional Appointments

Appointments and positions conveyed in a **formal manner** (e.g., via appointment letter, executed offer letter, employment contract) by one or more organizations, foreign or domestic, other than one's primary place of employment.

They are undertaken owing to the individual's professional expertise (e.g., as a physician, structural engineer, mathematician) and **usually are temporary in nature**.

In most cases, such appointments and positions consist of **professional service activities** (e.g., serving on or chairing local, state, regional, or national societies, boards, commissions, or committees; or serving as a professional staff member in local, state or Federal offices or agencies – such as a program officer at a Federal funding agency). Professional appointments and positions do not include service at purely charitable or faith-based organizations, or other activities that reside outside the individual's domain of professional expertise.

[46]

Biosketch – Professional Appointments

- Senior/key persons must only identify all domestic and foreign professional appointments and positions outside of the primary organization **for a period up to three years from the date the applicant submits the application** to the agency for funding consideration.

Questions

For questions concerning disclosures on biosketches and current & pending (other support forms), or about foreign components, contact your SPA Project Officer.