

HARVARD UNIVERSITY



International Collaborations and Activities - Checklist for GMAS Entry

Issued: March 2022

PI:

Sponsor:

Grants Manager/Project Administrator:

Proposal Due Date:

Project Title/ Nickname:

(For School Reviewer Only) Name of School Reviewer:

In each of the following sections, indicate if the proposed project will involve any of the activities and/or collaborations by answering **Yes** to all that will apply to the proposed project. If plans are not well-defined at the time of proposal, answer **No**.

*All projects involving a country of concern¹ must be approved by the school [Export Control Administrator](#) and [OVPR](#) before proposal submission or subsequent addition of the activity to the project (if not previously approved at the proposal stage). This may require the completion of additional forms per school official. **Note:** for all relevant agency guidance, please see Appendix III: Harvard and Sponsor Policies and Resources Related to International Collaborations and Activities.*

International Travel

Yes No

Will you or anyone on the project team be traveling outside of the U.S. to:

- Attend or present research results at a conference?
- Conduct fieldwork (e.g., data collection, surveying, collecting samples, conducting experiments)?
- Meet with international collaborators, subawardees, vendors, or consultants?
- Conduct human and/or animal subject research?
- Use equipment/facilities or acquire resources?
- Learn scientific or experimental techniques?

¹ For purposes of the ICAA “countries of concern” include Comprehensively Embargoed Countries (see Appendix II in the Business Process) as well as those countries defined as “Adversary Foreign Governments” under Sec. 745(a)(1) of the National Defense Authorization Act (2020) (see p.1044). Please see Appendix I: Country of Concern Information.

List all countries to which international travel will take place:

School Reviewer only

Is the proposed travel to a country of concern?

Yes No

If Yes:

- Confirm OVPR has been added as a signatory in GMAS
- Complete Appendix I, "ICA Country of Concern worksheet" as the basis for discussion with OVPR

For all travel:

- Advise the Grants Manager/Principal Investigator to check the rating(s) of the destination country/ies on the [GSS Travel Risk Ratings List](#). If the destination country/ies is/are elevated or high-risk, additional requirements may need to be satisfied., [Global Support Services](#) should be consulted to facilitate any pre-departure requirements, including as stipulated under the applicable student travel policies and any traveler registration.
- Confirm that all other International Component questions are answered consistently and in accordance with these International Travel activities.

Comments:

International Collaboration (other than Subaward recipients)

Yes No

Does the project involve collaboration with an individual (s) who is/are employed by or otherwise engaged outside of the United States, in support of the project aims, regardless of whether such individual (s) is/are receiving any funding under this project?

If yes, what project activities are anticipated?

Fieldwork, including data collection, surveying, collecting samples, and/or conducting experiments

Human and/or animal subjects research

Development or donation of resources (financial or in-kind) in support of the project
Contributing to publications or delivering presentations of project results
Exchange data and/or research materials
Hire in-country research staff or project managers
Other (please specify):

List all countries involved in international collaborations and the entities/collaborators involved and describe any existing Agreements (or necessary new Agreements) with the international collaborator(s):

School Reviewer only

Is the international/entity collaborator(s) located in a country of concern?

Yes No

If Yes:

- Confirm OVPR has been added as a signatory in GMAS
- Complete Appendix I, "ICA Country of Concern worksheet" as the basis for discussion with OVPR
- Document scientific justification for collaboration²

For all collaborations:

Is the international entity/collaborator(s) on a U.S. restricted party list or watch list (e.g., Specially Designated Nationals-SDN list; restricted parties; congressionally mandated restrictions; etc.)?³

Yes No

If yes, provide Comments

² Note that a justification that services, activities, etc. are less expensive in a country of concern may not be an acceptable rationale.

³ For SDN guidance, please refer to Harvard's Export Control Guidance: Specially Designated National List Screening Process and Monitoring.

Are there existing Agreements (or will there need to be a new Agreement) with the international collaborator(s)?

Yes No

- Confirm that all other International Component questions are answered consistently and in accordance with these International Collaboration activities.
- Advise the Grants Manager/Principal Investigator that all purchases or payments to individuals or entities outside of the U.S. in connection with the project should be governed by a vendor, services, or consulting agreement, or a purchase order that likewise flows down the appropriate terms (e.g., debarment certification and Uniform Guidance requirements under federal funding). Note that if the International Collaborator receives funding and performs substantive, programmatic work in furtherance of the project, a subaward agreement may be appropriate.
- If members of a foreign lab or foreign entity will be coming to Harvard, determine the nature of the visit, conduct an export control review of the technologies the individuals will have access to, and remind the Harvard host to follow the relevant school-level processes for visiting appointments.

Comments:

Establishment of New International Site:

Yes No

Will the proposed project require any of the following?

Use of project funds to purchase or lease real estate in a country other than the U.S.
Relocation of project personnel to a foreign country for multiple months at a time
Inclusion of Harvard's name in the title of a new international site
Hire in-country research staff or project managers

If yes to any, consult Appendix II, "Establishment of New International Site Reference."

List countries where international sites will be established

Provide a brief description of the proposed activities requiring the establishment of a new international site and describe the status of any internal reviews that may currently be underway or will soon be initiated. Depending upon the nature of the activities, [consultation with Global Support Services](#), Harvard Trademark Office, and/or your school's cognizant Dean or research administration office or

some combination may be required. This description must be entered into GMAS and will be reviewed by the Provost's Office (in addition to the information required to be provided per Appendix II):

School Reviewer only

Is the new international site located in a country of concern?

Yes No

If yes:

- Confirm OVPR has been added as a signatory in GMAS
- Complete Appendix I, "ICA Country of Concern worksheet" as the basis for discussion with OVPR
- Document scientific justification for new international site

Comments:

*For all new international sites:*⁴

- Confirm OVPR has been added as a signatory in GMAS, if required per Appendix II: Establishment of New International Site Reference
- Confirm that all other International Component questions are answered consistently and in accordance with the description of the new site
- Confirm the cognizant Dean has approved the establishment of the new international site and associated activities, if required per Appendix II: Establishment of New International Site Reference

Comments:

⁴ For more guidance on International Sites and planning, see the [International Project Planning Considerations](#).

Use of Facilities/Instrumentation at an International Site

Yes No

Will facilities and/or instrumentation at an existing foreign site be used to conduct the project?

Common examples include:

- The purchase of equipment or software in a foreign country for use on the project
- The use of foreign facilities or instrumentation, directly by Harvard, or by any of its collaborators, vendors, or subrecipients (excluding the performance of work by a formal foreign subrecipient using its instrumentation or facilities), which will benefit the project
- Any fabricated instruments at a foreign site that are intended to be shipped back to the US
- Any other payment to individuals or entities outside of the U.S. in connection with the project (excluding foreign subaward recipients)

This question is not intended to capture activities that are planned to occur at new Harvard international sites, which would be captured by the Establishment of New International Site question, but rather the use of existing foreign facilities and/or instrumentation.

List all countries where the use of facilities/instrumentation at an international site will take place:

Briefly describe the facility and/or instrumentation activities that will take place and provide details about who will be using the facilities/instrumentation and what specific activities will be performed. Note if payments will be made to foreign entities and foreign individuals in connection with such use:

School Reviewer only

Is the facility/instrumentation located in or otherwise being acquired from a country of concern?

Yes No

If yes:

- Confirm OVPR has been added as a signatory in GMAS
- Complete Appendix I, "ICA Country of Concern worksheet" as the basis for discussion with OVPR
- Document scientific justification for the use of facility/instrumentation

Comments:

For all uses of international sites/instrumentation:

Is the host facility or vendor on a U.S. restricted party list or watch list (e.g., Specially Designated Nationals-SDN list; restricted parties; congressionally mandated restrictions; etc.)?⁵

Yes No

If yes, provide comments:

Are there existing Agreements (or will there need to be a new Agreement) with the international host facility/site?

Yes No

If yes, describe existing/necessary agreements:

- Confirm that all other International Component questions are answered consistently and in accordance with the description of the use of facilities/instrumentation at a foreign site.

Comments:

⁵ Gather information on the type of restricted party list, restrictions that apply and the research subject to be shared with OVPR for review and determination whether the collaboration can move forward and if so, whether an export license is required.

International Shipment/Transfer/Exchange of Research Materials, Data, and/or Equipment

Yes No

Will the project involve any of the following?

- Shipment or transfer of equipment, software, or technology between the U.S. and international collaborators at a foreign site?
- Sharing of data with international collaborators (other than through publication)?
- Shipment or transfer of biological, chemical, or radioactive materials to be sent to or received from a foreign party/site?

List all countries to or from which research data, equipment, or materials will be shipped or transferred and describe any existing agreements (or necessary new agreements) with the international collaborator(s)/entity:

School Reviewer only

Are research data, equipment, or materials being shipped or otherwise transferred to or from a country of concern?

Yes No

If yes:

- Confirm OVPR has been added as a signatory in GMAS
- Complete Appendix I, "ICA Country of Concern worksheet" as the basis for discussion with OVPR
- Document scientific justification for shipment/transfer/exchange

Comments:

For all International Shipment/Transfer/Exchange of Research Materials, Data

Is the international entity/collaborator(s) with which research data, materials, and/or equipment is being exchanged on a U.S. restricted party list or watch list (e.g., Specially Designated Nationals-SDN list; restricted parties; congressionally mandated restrictions; etc.)?

Yes No

If yes, provide comments:

If research materials, data, samples, or equipment will be shipped or otherwise transferred to a foreign location, the Export Control Administrator must:

- Classify each item to be shipped/transferred per the Commerce Control List.
- Determine if any technology or data intended for export is controlled for the country, end use, or end-user in question.

Has your Export Control Administrator conducted the above export control reviews prior to the initiation of the collaboration when a Country of Concern is involved or prior to the occurrence of the activity for all other international collaborations?

Yes No

If yes, provide comments:

Are there existing agreements (or will there need to be a new agreement) with the international entity (entities)/collaborator?

Yes No

If yes, describe existing/necessary agreements:

- In addition to export control review, advise the Grants Manager/Principal Investigator that the shipment of any biological, chemical, or radioactive materials must be in accordance with the

University's Research Materials Shipping & Transport Manual and reviewed by both the School or Institute Export Control Administrator and Environmental Health and Safety.

- For guidance around the transfer of capital equipment or government owned equipment, please see the [Capital Equipment Policy](#).
- If the exchange of data is contemplated, direct the Grants Manager/Principal Investigator to the Harvard Research Data Security Policy, and otherwise note above that a Data Use Agreement may be required.
- Confirm that all other International Component questions are answered consistently and in accordance with the description of the international shipment/transfer/exchange of research materials.

Foreign Nationals (Required only for NASA, DoE, and DoD proposals)

Yes No

For the purposes of this question, Foreign National refers to an individual who is a citizen of any country other than the United States. This includes individuals working at Harvard while on a student, scholar, or work visa, but does not include individuals who hold U.S. permanent residency status (i.e. holders of a green card).

A 'Yes' response should be provided regardless of whether the foreign national will be working on the project in a paid or unpaid capacity.

List the home countries of any foreign national (s) working on the project, and confirm whether the individual(s) receives funding or other support (scholarship, stipends, in-kind, etc.) from their country of citizenship:

School Reviewer only

Is the individual a Harvard student, postdoctoral researcher, or faculty member at Harvard?

Yes No

If yes, describe appointment:

Does sponsor documentation include any restrictions on foreign nationals?

Yes No

If yes, describe restrictions:

Does the individual receive funding or other support (scholarship, stipends, in-kind, etc.) from their country of citizenship?

Yes No

If yes, describe:

For all foreign nationals:

- Country of concern: If the individual is a citizen of a Country of Concern, please confirm OVPR has been added as a signatory in GMAS (you do not need to complete Appendix I).
- NASA: Confirm the assurances required at proposal have been completed and reviewed.
- DOE/DOD: Notify the Grants Manager/Principal Investigator that additional personal information on foreign nationals participating in the project may be required at award or just-in-time consistent with DOE/DOD requirements.

Comments:

International Human Subjects and/or Animal Research

Yes No

Does the project involve human subjects and/or animal research at an international site? Check all that apply:

- Human subjects research
- Animal subjects research

List all countries in which human and/or animal subjects research will take place:

School Reviewer only

Is the human subjects/animal research being conducted in a country of concern?

Yes No

If yes,

- Confirm OVPR has been added as a signatory in GMAS
- Complete Appendix I, "ICA Country of Concern worksheet" as the basis for discussion with OVPR
- Document scientific justification for international human subjects/animal research

Comments:

For all International Human Subjects and/or Animal Research:

- Advise the Grants Manager/Principal Investigator that international human subjects research that requires full or expedited IRB review will require Provost's review prior to award signature. Such review is coordinated by the IRB through their processes in ESTR.
- Confirm that the appropriate approvals (IRB and/or IACUC) have been added in GMAS
- Confirm that all other International Component questions are answered consistently and in accordance with the international human subjects or animal research.

Comments:

Impact on U.S. Foreign Policy (NIH Only)

Yes No

Please provide a brief description of any proposed project activity that may have an impact on U.S. foreign policy through the involvement in the affairs or environment of a foreign country:

List all countries where activities with the potential to impact U.S. foreign policy will take place:

School Reviewer only

For all projects with the potential to impact U.S. foreign policy:

- Determine whether this falls under a [Provostial Review Criteria](#), and if so, confirm that OVPR has been added as a signatory in GMAS.
- Confirm that any activity that may have an impact on U.S. foreign policy has been appropriately captured as a Foreign Component consistent with NIH requirements.
- Confirm that all other International Component questions are answered consistently and in accordance with the description of these activities.

Comments:

Appendix I: Country of Concern Worksheet

Information about the entity and individual (s):

Legal name of entity (employer, company, etc.), and website:

Name of individual(s), including title (if applicable):

City/State or Province/Country:

Has the PI worked with this entity/individual previously? What is the history of the relationship?

Does the proposed activity raise any export control concerns? For example:

- Is the international entity/collaborator(s) on a U.S. restricted party list or watch list (e.g., Specially Designated Nationals-SDN list; restricted parties; congressionally mandated restrictions; etc.)?
- Is the entity known to be associated with a Talent Program?
- Is any technology or data intended for export controlled for the recipient country, end use, or end-user in question?
- As relevant, please reference the [China Defense Universities Tracker](#), and describe any overlap between the issues highlighted for the relevant university(ies) and the sponsored work.

Yes No

If yes, describe:

What is the scientific justification for the activity (e.g., Country A has the only telescope capable of seeing that distance, the leading researcher on the issue is in Country B, post-doc recently left Harvard for Country C Institute of Technology)?

Has the Principal Investigator's portfolio been reviewed to determine any potential impacts if funded (e.g., NASA or DOD funding, requisite disclosures to other relevant sponsors)?

Yes No

Comments:

Are there existing Agreements (or will there need to be a new Agreement) with the international entity/individual (entities)?

Yes No

If yes, provide additional comments:

Appendix II: Establishment of a New International Site Reference

OVPR Review is required if the project involves any of the following:

- a. The establishment of an office or other physical presence for the University outside the United States, defined as:
 - (i). A Harvard-controlled legal entity outside the United States, including but not limited to entities established by Harvard Global; or
 - (ii). Real estate, including offices and research space, that is rented, leased, or owned for Harvard's use for a period of six months or longer.
- b. The posting of a Harvard faculty member, staff member, or trainee to a country other than the United States for a period of 6 months or longer.

If the above elements are present, please provide the below information to Provost:

- Rationale for in-country activities;
- If establishing an office or other physical presence: details of the long-term plan for the site, including the level of Harvard engagement (e.g., timeline, number of researchers/staff working on site, in-kind support, etc.), any collaborators, plans for winding down (e.g., decommissioning? Site to be supported by local collaborator?), and what contingency plans are in place in case of de-funding before site and/ or project conclusion;
- For posting faculty, staff, or training for a period of 6 months or longer: details of any collaborators, contracts, and relevant locations
- Updates on any other required reviews, whether initiated yet or not (see also: [International Project Planning Guidance](#) and [UCIPS website](#)):
 - Approval of the cognizant Dean;⁶
 - Trademark Office if Harvard name or trademark is involved;
 - Unit review and approval:
 - Suitable resources and funding available?
 - In-country contracts for property and contractors?
 - Do the researchers need to register in the country to perform the work?
 - Are there any tax/payroll implications?
 - Car rental or purchase appropriately registered in the name of local collaborator and approved by cognizant procurement and/or equipment office?
 - Engagement of Global Support Services if involves travel to a "[High Risk](#)" area, recruiting local staffing, or purchase or lease of facilities or equipment including vehicles, etc.; and
 - Export control review for restricted parties and technologies and/or information.

⁶ Where Decanal approval is required for a criterion, the cognizant Dean must provide an explicit approval.

Appendix III: Harvard and Sponsor Policies and Resources Related to International Collaborations and Activities

Harvard Policies and Resources

International Travel

- [Harvard Global Support Services](#)
- [Harvard Travel Services](#)
- [University Export Controls Policies and Procedures](#)
- [Harvard International Office](#)

Establishment of a New International Site

- [Criteria for Provost's Review of New Projects of Grants](#) (see #3)
- [Harvard Global International Employment Services](#)
- [Harvard Payroll Policy](#)
- [Harvard Trademark Office - Use of Name Policy](#)

Use of Facilities/Instrumentation at an International Site

- [OVP's International Research Project Planning Guide](#)

International Shipment/Transfer/Exchange of Research Materials, Data, and/or Equipment

- [University Export Controls Policies and Procedures](#)
- [Data Use Agreements](#)
- [Material Transfer Agreements](#) (administered by OTD)
- [EHS: Shipping and Transporting Research](#)
- [Harvard's Financial Management of Property, Plant and Equipment Policy](#)
- [Capital Equipment Policy](#)

Foreign Nationals

- [Openness in Research Policy](#)

International Human Subjects or Animal Research

- [Criteria for Provost's Review of New Projects of Grants](#) (see # 4)
- [Committee on the Use of Human Subjects](#) (IRB for the Cambridge campus)
- [Harvard Longwood Campus IRB](#)
- [FAS IACUC](#) Administration (oversees animal research for the Cambridge campus)

- [Office of the IACUC](#) (oversees animal research for the Longwood campus)

Impact on Foreign Policy

- [OGC FAQs](#) (under Governance, see [Is Harvard permitted to engage in lobbying activities?](#))
- [Office of the Vice Provost for International Affairs – Memoranda of Understanding \(MOUs\) and Other Agreements](#)

Sponsor Policies and Resources

National Institutes of Health (NIH)

- [Definition of Foreign Component from the NIH Grants Policy Statement \(GPS\)](#)
- [NIH Other Support and Foreign Component FAQs](#)

National Science Foundation (NSF)

- [Definition of International Activities from the Proposal and Award Policies and Procedure Guide \(PAPPG\)](#)

National Aeronautics and Space Administration (NASA)

- [NASA restrictions on Funding Activities with the People's Republic of China](#)

Dept. of Defense – Defense Advanced Research Projects Agency (DARPA)

- [DARPA's "Countering Foreign Influence Program \(CFIP\)"](#) including a new ["Foreign Influence Risk Rubric for Senior/Key Personnel"](#)

ARPA-E

- [Pre-Award Guidance Section III. A.3. Eligibility Information - Foreign Entities](#)