

Foreign Government-Sponsored Talent Recruitment Programs Cayuse Response Standard Operating Procedures

Summary

As part of our efforts to increase research security and respond to evolving federal government requirements related to research security, the Office of the Vice President for Research, as of July 1, 2021, will be requiring all Principal Investigators and Co-Principal Investigators to certify in Cayuse on their proposal and award IPF (Internal Processing Form) if they are participants in a Foreign Government-Sponsored Talent Recruitment Program (“talent program”).

A talent program is an effort to recruit science and technology professors, researchers, and students, which is directly or indirectly organized, managed, or funded by a foreign government or institution. Individuals are often recruited without regard to citizenship or national origin, and positions may be full- or part-time. Talent programs often seek to import or otherwise acquire proprietary technology or software, unpublished data and methods, and intellectual property from abroad—sometimes obtained through illicit means—to modernize the foreign nation’s military and grow its economy.

Actions

1. Principal Investigators and Co-Principal Investigators must certify in Cayuse on their proposal and award IPF (Internal Processing Form) whether or not they, or any participants of the project, are part of a Foreign Government-Sponsored Talent Recruitment Program.
2. If the question is checked yes, the IPF will be sent to the University Research Compliance Office, (URCO) Cheryl Doerr, cdoerr@ksu.edu and Lisa Brummett, lbrumme@ksu.edu.
3. The URCO will conduct a Restricted Party Screening and enter the information on the talent program into an URCO spreadsheet.
4. Concurrently, the information on the participation with the talent program will be shared with the Associate Vice President for Research /Director of PreAward Services to a) verify there are no prohibitions in the award related to participation in the talent program and b) that the information has been duly reported to the federal sponsor, as required.
5. URCO will also concurrently share the information with the Research Security Officer to conduct a risk assessment/analysis.
6. Once all reviews are complete, if there are no export controls, research security, or award/grant concerns, Cheryl Doerr will approve the IPF and add a Cayuse Flag to the IPF.
7. If there are export control, research security, or award/grant concerns, a small working group comprised of the four above-mentioned individuals will review the issue and, make recommendations on how to address the issues to the Vice President for Research. Such resolution could include options such as requesting the Investigator voluntarily resign from the FGTRP or the Investigator choosing not to submit or accept an award/grant.
8. Regardless of any concerns listed above, the Research Security Officer, working with URCO, will meet with the individual(s) to discuss the concerns with talent program membership.

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