



Ohio Administrative Code

Rule 3341-7-12 Malign Foreign Talen Recruitment Program.

Effective: June 24, 2026

(A) Policy statement and purpose

(1) Statement of institutional authority

Bowling Green state university (BGSU) is committed to safeguarding the integrity of its research enterprise and complying with all federal laws, regulations, and sponsor requirements related to malign foreign talent recruitment programs (MFTRPs).

Federal agencies including DOE, NSF, NIH, DOD, and others prohibit participation in programs defined as MFTRPs.

BGSU strictly prohibits:

- (a) Participation in any malign foreign talent recruitment program
- (b) Activities that compromise U.S. national or economic security
- (c) Undisclosed foreign research support, affiliations, or appointments

BGSU requires full and accurate disclosure of all foreign relationships, support, affiliations, and collaborations.

(2) Purpose of the policy

The purpose of this policy is to:

- (a) Protect the integrity and security of BGSU research
- (b) Ensure compliance with federal MFTRP prohibitions
- (c) Establish institutional expectations for disclosure, review, and approval of foreign engagements
- (d) Prevent conflicts of commitment, confidentiality violations, and unauthorized research transfer
- (e) Require researchers to avoid participation in prohibited foreign recruitment programs

Specific procedures will be maintained separately by research integrity

(3) Governing principles

- (a) Integrity and transparency



3341-7-12

2

All international engagements must be fully disclosed, documented, and consistent with sponsor, federal, and BGSU requirements.

(b) Compliance with U.S. law

BGSU adheres to federal definitions of MFTRPs and U.S. prohibitions on participation.

(c) Security of research and intellectual property

Researchers must safeguard research findings, data, and intellectual property against misuse or unauthorized transfer.

(d) Responsibility for disclosure

Individuals engaged in research must actively disclose outside affiliations, financial interests, foreign support, and international appointments.

(B) Policy definitions

(1) Malign foreign talent recruitment program (MFTRP)

A foreign-state-affiliated recruitment program that violates U.S. national security or research integrity standards by incentivizing the unauthorized transfer of research, technology, or intellectual property.

(2) Foreign talent recruitment program

A broad category of programs offering foreign affiliations or incentives; some are benign, others prohibited.

(3) Foreign source

Any non-U.S. government, institution, company, university, or individual providing support, funding, or affiliation.

(4) Disclosure

Full and accurate reporting of foreign commitments, relationships, support, or affiliations.

(5) Principal investigator

The individual responsible for the intellectual direction and administrative oversight of a sponsored project.



3341-7-12

3

(6) Research

A systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge (45 CFR 46.102(d)).

(7) Research data

Any records, materials, or results needed to replicate, validate, or verify research findings.

(C) Policy scope and policy

(1) Examples of a malign foreign talent recruitment program

A MFTRP generally includes foreign programs that:

- (a) Provide incentives to individuals to transfer U.S. research or technology to a foreign country
- (b) Require individuals to recruit others to join the program
- (c) Require non-disclosure of affiliation or participation
- (d) Involve contracts that conflict with U.S. ethical and security standards
- (e) Require research activities to be conducted outside the United States without sponsor approval
- (f) Require affiliation with a foreign institution in a way that undermines U.S. interests
- (g) Include financial compensation, in-kind support, or remuneration in exchange for research transfer

Researchers must consult federal definitions for complete criteria.

(2) Prohibited activities

BGSU prohibits all faculty, staff, students, and affiliates from:

- (a) Participating in any malign foreign talent recruitment program
- (b) Entering undisclosed or unauthorized foreign academic or research contracts



3341-7-12

4

- (c) Accepting compensation, titles, or appointments from foreign institutions in exchange for research transfer
- (d) Signing agreements requiring secrecy, nondisclosure, or conflicting obligations
- (e) Providing access to non-public, proprietary, or export-controlled research without authorization
- (f) Moving research activities to a foreign institution without sponsor approval
- (g) Misrepresenting or failing to disclose foreign support, affiliations, or commitments

(3) Mandatory disclosure requirements

Individuals engaged in research must disclose:

- (a) All foreign affiliations, appointments, or employment
- (b) All foreign research support or in-kind contributions
- (c) All participation in foreign talent programs (benign or malign)
- (d) All foreign consulting activity related to research
- (e) All laboratory or facility access provided to foreign entities
- (f) Any recruitment attempts by foreign entities that may constitute MFTRPs

(4) Where to submit disclosures

Disclosures must be submitted to:

- (a) Division of research (for research-related disclosures)
- (b) BGSU's conflict of interest/conflict of commitment systems
- (c) Applicable federal sponsors (as required)

(5) Review by institution

Upon disclosure of a foreign engagement, the division of research will:

- (a) Conduct a compliance review



3341-7-12

5

- (b) Determine whether the activity constitutes a prohibited MFTRP
- (c) Require modifications, withdrawal, or termination of prohibited activities
- (d) Provide guidance to ensure compliance

No BGSU official may approve a prohibited MFTRP or any activity that violates federal regulations.

(6) Funded research

Individuals participating in federally funded research must:

- (a) Comply with all federal MFTRP prohibitions
- (b) Ensure all disclosures align with sponsor requirements
- (c) Report any change in circumstance promptly using BGSU's conflict of interest/conflict of commitment systems

Failure to comply may jeopardize grant funding and federal research eligibility.

(7) Use of procedures

The division of research will maintain written procedures addressing:

- (a) Disclosure of foreign engagements
- (b) Review and determination of MFTRPs
- (c) Required training and education
- (d) Reporting obligations to federal sponsors
- (e) Corrective actions and resolution pathways

(8) Compliance

Noncompliance with this policy may result in:

- (a) Suspension or termination of research privileges
- (b) Ineligibility for sponsored research
- (c) Loss of internal research support



3341-7-12

6

(d) Employment-related disciplinary action

(e) Mandatory reporting to federal agencies

(f) Additional sanctions as required by law

(D) Policy provisions

(1) Responsible office

The division of research is responsible for the oversight and implementation of this policy.

(2) Implementation of policy

WHO	TASK
Vice President for Research	Ensure institutional compliance; take action on violations; enforce federal MFTRP requirements.
Division of Research / Research Integrity	Maintain procedures; conduct reviews; evaluate disclosures; train researchers; coordinate required federal reporting.
Principal Investigators	Disclose all foreign engagements; ensure research personnel comply with MFTRP standards.

(E) Related university policies

(1) 3341-7-05 - Research misconduct

(2) 3341-7-07 - Protection of human subjects

(3) 3341-7-08 - Protection of vertebrate animals

(4) 3341-7-09 - Use of controlled substances for non-therapeutic purposes

(F) Related government policies and guidance

(1) CHIPS and science act MFTRP provisions



3341-7-12

7

- (2) NSF, NIH, DOE, DOD MFTRP definitions and prohibitions
- (3) Federal research security programs and disclosure requirements
- (4) National security presidential memoranda on foreign influence