



**Massachusetts Institute of Technology**

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**Maria T. Zuber**, Vice President for Research  
**Richard K. Lester**, Associate Provost

Dear colleagues:

We write to let you know about a new review process for certain international collaborations.

MIT faculty naturally and enthusiastically seek out international projects and collaborators. Because these relationships can present a distinctive set of risks and questions, MIT has long had processes for identifying such issues for any given project. Given the increase in quantity and scope of global collaborations, in fall 2017 we launched an effort to strengthen our internal process for evaluating and structuring proposed international engagements. Most recently we have determined that engagements with certain countries – currently China, Russia and Saudi Arabia – merit additional faculty and administrative review beyond the usual evaluations that all international projects receive.

*NOTE: At this time, based on this enhanced review, MIT is not accepting new engagements or renewing existing ones with Huawei and ZTE or their respective subsidiaries due to federal investigations regarding violations of sanction restrictions. The Institute will revisit collaborations with these entities as circumstances dictate.*

This letter outlines the new review process. It is designed to enable MIT to engage with the world effectively, with responsible management of risks and in keeping with the values of our community.

Even if you have no current or planned engagements in any of the highlighted countries, we encourage you to read through the process we describe below.

Sincerely,

Richard K. Lester

Maria T. Zuber

## New Review Process for 'Elevated-Risk' International Proposals

### What projects will be subject to additional review?

- Projects funded by people or entities from China (including Hong Kong), Russia and Saudi Arabia
- Projects which involve MIT faculty, staff or students conducting work in these countries
- Collaborative projects with people or entities from these countries

Special attention will be paid to risks related to intellectual property, export controls, data security and access, economic competitiveness, national security, and political, civil and human rights, as well as potential impacts on the MIT community, consistency with MIT's core values, and alignment with MIT's academic mission.

As international circumstances change, the list of countries subject to this additional review may be modified.

### How does one submit projects for review?

If you are considering a project in, related to, or funded by a person or entity from China, Russia or Saudi Arabia, **please start by following your regular process and work with the relevant department or office** (e.g. Office of Sponsored Programs for sponsored research, Resource Development for gifts, etc.), and they will initiate the new review process. If your activity falls outside an established process or you are uncertain about how to proceed, please reach out to [icc-admin@mit.edu](mailto:icc-admin@mit.edu) for assistance.

### How will the new review process work?

Decisions on whether a given project can proceed will be made at the conclusion of the following process:

- **PHASE ONE: Compliance Review by the International Coordinating Committee**  
Your project will first be considered by the [International Coordinating Committee \(ICC\)](#), a group of experienced professional staff in key project areas including finance, law, tax, export control and operations. This stage of review requires a proposal and budget.

After reviewing the project, the ICC will provide the principal investigator (PI) with information and advice on anticipated risks and ways to reduce or avoid them. The PI will then decide whether to modify certain aspects of the proposed project in response. ICC representatives will also work on contract negotiations.

Phase One is designed as an iterative, dynamic process intended to increase a project's odds of approval. The ICC will ultimately either recommend that the project proceed or refer it to the Associate Provost for International Activities (Associate Provost) for additional review.

- **PHASE TWO: Academic Review by the International Advisory Committee**  
Based on the recommendation of the Associate Provost, certain of these projects may be reviewed by the [International Advisory Committee \(IAC\)](#). The IAC is a faculty-led, standing committee of the Institute that provides an independent faculty voice in advising the senior administration on the Institute's major international engagements. Its role is to review and assess significant engagements to help ensure that they effectively advance MIT's core academic mission of education, research and service. Which activities need IAC review is determined by the chair of the IAC in consultation with the Associate Provost. While the IAC's reviews are not limited to the countries we have identified as requiring special consideration, its evaluations of engagements in or with the highlighted countries will provide important input to the Senior Risk Group.
- **PHASE THREE: Project Risk Review by the Senior Risk Group**  
If, following the ICC's compliance review in Phase One, the Associate Provost determines that a significant risk remains, the project will be evaluated by the Senior Risk Group (SRG). The SRG is a new body, composed of the Associate Provost, the Vice President for Research, and the Vice President and General Counsel. Based on ICC and PI evaluations of potential project risks, and in consultation, as needed, with others at MIT and external experts, the SRG will review the project with the PI and will either approve the project with a risk management plan or decide that the project cannot proceed. For projects that have undergone IAC review in Phase Two, the IAC's assessment will be a key input to the Senior Risk Group. Proposals for

international projects from other countries will continue to follow their current process of ICC and, in some cases, IAC review.

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Please note that the *Ad Hoc* Committee on General Guidelines for International Engagement, proposed by President Reif in his February 6 letter to the MIT community, is expected to complete its work by the fall and to provide input to the International Advisory Committee, the Senior Risk Group, the Provost, and the President at that time.