

Risk-Based Measures to Assess Potential Undue Foreign Influence Conflicts of Interest ⁵ or Conflicts of Commitment ⁶				
Rating	Factors for Assessing Senior/Key Personnel Disclosures			
	Factor 1: Foreign Talent Program	Factor 2: Denied Entity Lists	Factor 3: Funding Sources	Factor 4: Foreign Institutions or Entities
<u>VERY HIGH</u>	Indicators of active (ongoing) participation in a Foreign Talent Program run by the government of a strategic competitor or country with a history of targeting U.S. technologies (CWHTUST) for unauthorized transfer.	Indicators of an active (ongoing) affiliation ³ with an entity on the US Govt identified denied entity or person list or EO 13959 or subsequent similar issuances.	Indicators of active (ongoing) direct funding from a foreign government or a foreign government-connected entity of a strategic competitor or CWHTUST.	Indicators of active (ongoing) affiliation ³ with a high-risk foreign government, or foreign government-connected, institution or entity.
<u>HIGH</u>	Indicators of past participation in a Foreign Talent Program run by the government of a strategic competitor or CWHTUST but with indications that a professional association with the program has continued.	Indicators of past affiliation ³ or multiple recent associations ⁴ (within the last four years) with an entity on the US Govt identified denied entity or person list or EO 13959 or subsequent similar issuances.	Indicators of history/pattern of direct funding from a foreign government or from a foreign government-connected entity of a strategic competitor or CWHTUST.	Indicators of multiple active (ongoing) direct associations ⁴ with a high risk foreign government, or foreign government-connected, institution or entity.
<u>MODERATE</u>	Indicators of active (ongoing) participation in a Foreign Talent Program run by the government of a U.S. ally who has technology sharing agreement with a CWHTUST.	Indicators of multiple past associations ⁴ with an entity identified in the U.S Govt denied entity list or EO 13959 or subsequent similar issuances.	Indicators of past non-consecutive, sporadic funding from a foreign government or foreign government-connected entity of a strategic competitor or CWHTUST.	Indicators of multiple past direct associations ⁴ with a high risk foreign government, or foreign government-connected, institution or entity.
<u>LOW</u>	No Participation in a Foreign Talent Program.	No Indicators of past or current association ⁴ or affiliation ³ with an entity on the US Govt identified denied entity or person list or EO 13959 or subsequent similar issuances...	No indicators of past funding from a foreign government or foreign government-connected entity of a strategic competitor or CWHTUST.	No indicators of an association ⁴ or affiliation ³ with a high-risk foreign government, or foreign government connected, institution or entity.

Note 1: The existence of disclosures involving any of the four factors in this rubric is not automatically disqualifying.

Note 2: Co-authorship by itself is not a consideration of this rubric.

Note 3: Affiliation is defined as academic, professional, or institutional appointments or positions with a foreign government or government-connected entity, whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary), where direct monetary or non-monetary reward is involved.

Note 4: Association is defined as academic, professional, or institutional appointments or positions with a foreign government or government-connected entity, whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary), where no direct monetary or non-monetary reward is involved.

Note 5: Conflict of interest, as defined in NSPM-33, is a situation in which an individual, or the individual's spouse or dependent children, has a financial interest or financial relationship that could directly and significantly affect the design, conduct, reporting, or funding of research.

Note 6: Conflict of commitment, as defined in NSPM-33, is a situation in which an individual accepts or incurs conflicting obligations between or among multiple employers or other entities.

Note 7: More information on DARPA's policy and Frequently Asked Questions can be found at the following link: <https://www.darpa.mil/work-with-us/for-universities>.