

## **Introduction to the 2025 DoD Component Decision Matrix to Inform Fundamental Research Proposal Mitigation Decisions**

The document “2025 DoD Component Decision Matrix to Inform Fundamental Research Proposal Mitigation Decisions” is an update to the original decision matrix, published in 2023. The update strengthens research security by simplifying and clarifying reviews of problematic behaviors, and includes new requirements established by Congress. The document is a guide to assist DoD Components and program managers in reviewing fundamental research proposals for potential conflicts of interest and conflicts of commitment. This decision matrix identifies actions prohibited by law that would preclude an investigator or institution from receiving funding from the Department. The document also describes conditions under which mitigation is required or suggested prior to receiving funding from the Department, depending on the type of conflict. The Department is making this document public to be transparent about the types of behaviors the Department finds problematic and to provide DoD-funded institutions and researchers a full understanding about how their proposals may be received and reviewed. This decision matrix is in effect for proposals submitted after May 9, 2025.

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# **2025 Department of Defense (DoD) Component Decision Matrix to Inform Fundamental Research Proposal Mitigation Decisions**

This document is a decision aid to help DoD Components make informed decisions regarding risk mitigation measures for fundamental research projects. It includes definitions, reference materials, and other key factors for DoD Components conducting risk-based security reviews of fundamental research project proposals selected for potential award. This decision matrix is in effect for proposals submitted after May 9, 2025.

In accordance with section 10632(a)(1) of the CHIPS and Science Act of 2022 (Public Law 117-167), DoD Components must annually verify that participants listed on the Research Performance Progress Report are not involved in malign foreign talent recruitment programs, as defined in section 10638(4).

Additionally, DoD Components are required to provide annual summaries of their risk-based security reviews to the Office of the Under Secretary of Defense for Research and Engineering (OUSD(R&E)). These summaries will include the number of reviews that the Component conducted, the number of fundamental research project proposals that were rejected based on a risk-based security review, and detailed descriptions of those risks. The OUSD(R&E) will adjust the frequency of updates as needed to effectively oversee DoD Component usage of Table 1 for fundamental research project proposal mitigation decisions.

Actions prohibited by law:

- None of the funds authorized to be appropriated or otherwise made available for the DoD for fiscal year (FY) 2025 may be obligated or expended to award a grant, contract, or other assistance to an institution of higher education for the specific purposes of conducting fundamental research in collaboration with a covered entity that is included on the most recent version of the list developed pursuant to section 1286 of the National Defense Authorization Act (NDAA) for FY 2019, as amended, or to any employees of such institutions.
- The DoD is prohibited from providing funding to or making an award of a fundamental research project proposal in which a covered individual is participating in a malign foreign talent recruitment program.
- No U.S. institution of higher education that hosts a Confucius Institute may receive DoD funds.

Collaborations between covered individuals and international researchers do not require mitigation if they do not involve any of the factors described in Table 1. Table 1 identifies collaboration factors with individuals or entities (regardless of country) known to engage in practices and behaviors that could jeopardize national or economic security, violate research integrity, or involve foreign government interference. Co-authorship and patents are both useful in providing a full picture of a fundamental research project's risks but are not, on their own, sufficient cause to deny funding for a fundamental research project proposal. International collaboration is an important mechanism for participating in the global scientific commons and promoting progress in fundamental research.

**Table 1: Decision Matrix to Inform Fundamental Research Proposal Mitigation Decisions  
Factors for Assessing a Covered Individual’s Affiliations, Collaborations, and Funding**

	<b>Factor 1: Foreign Talent Recruitment Programs</b>	<b>Factor 2: Funding Sources</b>	<b>Factor 3: Patents</b>	<b>Factor 4: Entity Lists</b>
<b>Prohibited factors</b>	Indicator(s) <sup>1</sup> of active participation <sup>2</sup> in a malign foreign talent recruitment program (MFTRP).	<b>None</b>	<b>None</b>	<b>For FY 2025:</b> <sup>3</sup> Collaborations for the specific purpose of fundamental research <sup>4</sup> between institutions of higher education and academic institutions that are included in the most recently updated list developed pursuant to section 1286 of the NDAA for FY 2019, as amended, or employees of such institutions. <sup>5</sup>
<b>Factors discouraged by DoD policy, mitigation measures required, rejection of proposal required if no mitigation possible</b>	<b>None</b>	Indicator(s) that the covered individual is currently receiving funding from a Foreign Country of Concern (FCOC) or an FCOC-connected entity.	Patent application(s) or patent(s) not disclosed in proposal, that resulted from research funded by the U.S. Government (USG), that were filed in an FCOC prior to filing in the United States or filed on behalf of an FCOC-connected entity.	<b>For the period after Aug 9, 2022:</b> <sup>6</sup> Indicator(s) of affiliation with an entity on the version at the time of review of the U.S. Bureau of Industry and Security (BIS) Entity List, <sup>7</sup> the Annex of Executive Order (EO) 14032 <sup>8</sup> or superseding EOs, section 1260H of the NDAA for FY 2021, <sup>9</sup> or section 1286 of the NDAA for FY 2019, as amended.
<b>Mitigation measures expected</b>	<b>For the period between Oct 10, 2019<sup>10</sup> and Aug 9, 2024:</b> Indicator(s) of participation in an MFTRP meeting any of the criteria in section 10638(4)(A) of the CHIPS and Science Act of 2022.	<b>For the period after Oct 10, 2019:</b> Indicator(s) that the covered individual received funding from an FCOC or an FCOC-connected entity.	Patent application(s) or patent(s) disclosed in proposal resulting from research funded by the USG that were filed in an FCOC, or on behalf of an FCOC-connected entity, prior to filing in the United States.	<b>For the period between Oct 10, 2019 and Aug 9, 2022:</b> Indicator(s) of affiliation with an entity on the current version of the U.S. BIS Entity List, the Annex of EO 14032 or superseding EOs, section 1260H of the NDAA for FY 2021, or section 1286 of the NDAA for FY 2019, as amended.
<b>Mitigation measures suggested</b>	<b>For the period after Oct 10, 2019:</b> Covered individual’s co-author(s) <sup>11</sup> on publications in scientific and engineering (S&E) journals are participants in an MFTRP meeting any of the criteria in section 10638(4)(A) of the CHIPS and Science Act of 2022. <b>For the period of 10 years prior to Oct 10, 2019:</b> Indicator(s) of participation in an MFTRP meeting any of the criteria in section 10638(4)(A) of the CHIPS and Science Act of 2022.	<b>For the period of 10 years prior to Oct 10, 2019:</b> Indicator(s) that the covered individual received limited or partial funding from an FCOC or an FCOC-connected entity.	Patent application(s) or patent(s) not disclosed in fundamental research project proposal that resulted from research funded by the USG that were filed in a non-FCOC, or on behalf of an entity in a non-FCOC, prior to filing in the United States. <b>or</b> Co-patent(s) application(s) with a person on the U.S. BIS Denied Persons List. <sup>12</sup> <b>or</b> Co-patent(s) applications(s) with an individual affiliated with any entity on the U.S. BIS Entity List, the Annex of EO 14032 or superseding EOs, section 1260H of the NDAA for	<b>For the period of 10 years prior to Oct 10, 2019:</b> Indicator(s) of affiliation with an entity on the current version of the U.S. BIS Entity List, the Annex of EO 14032 or superseding EOs, section 1260H of the NDAA for FY 2021, or section 1286 of the NDAA for FY 2019, as amended. <b>For the period after Oct 10, 2019:</b> Covered individual’s co-author(s) on publications in S&E journals are affiliated with an entity on the U.S. BIS Entity List, the Annex of EO 14032 or superseding EOs, section 1260H of the NDAA for FY 2021, or section 1286 of the NDAA for FY 2019, as amended. Covered individual is a co-author on a publication in an S&E journal with a person(s) on the U.S. BIS Denied Persons List.

			FY 2021, or section 1286 of the NDAA for FY 2019, as amended.	
<b>No mitigation needed</b>	No indicator(s) of participation in an MFTRP meeting any of the criteria in section 10638(4)(A) of the CHIPS and Science Act of 2022.	No indicator(s) that the covered individual is receiving, or has received, funding from an FCOC or an FCOC-connected entity.	All patent applications or patents resulting from research funded by the USG have been filed in the United States prior to filing in any other country.	No indicator(s) of any affiliation with an entity on the U.S. BIS Entity List, the Annex of EO 14032, or superseding EOs; section 1260H of the NDAA for FY 2021; or section 1286 of the NDAA for FY 2019, as amended.  No indicator(s) that a covered individual's co-author(s) on publications in S&E journals are affiliated with an entity on the U.S. BIS Entity List; the Annex of EO 14032 or superseding EOs; section 1260H of the NDAA for FY 2021; or section 1286 of the NDAA for FY 2019, as amended; and no indicator(s) that the covered individual is a co-author on a publication in an S&E journal with a person(s) on the U.S. BIS Denied Persons List.

**Note 1:** An indicator may reveal or acknowledge undue foreign influence. Examples include foreign funding or foreign affiliations revealed in proposal disclosures, publications, curriculum vitae (CV), institution website announcements, or social media posts.

**Note 2:** Participation may be identified by a contract between the covered individual and an MFTRP, reported by the covered individual in the fundamental research project proposal or on a CV or resume, or identified in an acknowledgement in a publication listing the covered individual and an MFTRP.

**Note 3:** Section 238 of the NDAA for FY 2025 (Public Law 118-159), "Limitation on Availability of Funds for Fundamental Research Collaboration with Certain Academic Institutions." The Assistant Secretary of Defense for Science and Technology may waive this limitation on a case-by-case basis with respect to an individual grant or contract for an institution of higher education if the Assistant Secretary determines that such a waiver is in the national security interests of the United States.

**Note 4:** "Collaborations for the Specific Purposes of Fundamental Research" means research that is identified in the fundamental research project proposal that is to be conducted with an entity that is included on the most recent version of the list developed pursuant to section 1286 of the NDAA for FY 2019, as amended, or to any employees of such entities.

**Note 5:** The list of "Institutions of the People's Republic of China, Russian Federation, and Other Countries with Specified Characteristics" developed pursuant to section 1286 of the NDAA for FY 2019, as amended, is published at <https://rt.cto.mil/stpp/mta/>.

**Note 6:** The level of mitigation needed is elevated if any of the disclosed or identified indicators occurred after the signing of the CHIPS and Science Act of 2022.

**Note 7:** An addition to the U.S. BIS Entity List is active on or after the Federal Register citation date provided on the U.S. BIS Entity List.

**Note 8:** EO 14032, "Addressing the Threat from Securities Investments That Finance Certain Companies of the People's Republic of China," dated 3 Jun 2021 (superseding EO 13959), bans new U.S. investment in certain communist military companies (CCMCs). The DoD maintains and updates lists of CCMCs for the purposes of compliance with EO 14032.

**Note 9:** Most recent annual version of "The Notice of Designation of Chinese Military Companies" under section 1260H of the NDAA for FY 2021.

**Note 10:** The need for mitigation is elevated if any of the disclosed or identified indicators occurred after publication of the Under Secretary of Defense for Research and Engineering "Letter to Academia," dated 10 Oct 2019.

**Note 11:** Co-authorship is identified as a category where mitigation is suggested when a covered individual is collaborating with entities or persons associated with factors listed in this matrix and should not be a basis for rejection of a fundamental research project proposal.

**Note 12:** Individuals on the U.S. BIS Denied Persons List are active between the effective date and the expiration date provided on the U.S. BIS Denied Persons List.

## Definitions

**Affiliation:** Academic (not including undergraduate or graduate students), professional, or institutional appointments or positions with a foreign government or a foreign government-connected entity, whether full-time, part-time, or voluntary (including adjunct, visiting, post-doctoral appointment, or honorary).

**Applied Research:** Original scientific investigation undertaken in order to acquire new knowledge and directed primarily towards a specific practical aim or objective.

**Basic Research:** Experimental or theoretical work undertaken primarily to acquire new knowledge of the underlying foundations of phenomena and observable facts.

**Confucius Institute:** As defined in section 1044(b)(2) of the NDAA for FY 2024, a Confucius Institute is “any program that receives funding or support from the Chinese International Education Foundation, the Center for Language Exchange Cooperation of the Ministry of Education of the People’s Republic of China, or any cultural institute funded by the Government of the People’s Republic of China.” A cultural institute does not need to be named a “Confucius Institute” to be deemed one.

**Covered Individual:** An individual at an extramural research institution who, as designated by the extramural research institution, contributes significantly to the design or execution of a research and development project that is funded, in whole or in part, by the DoD, and who is considered essential to the successful performance of the research and development project. Covered individuals include those listed as key personnel in fundamental research project proposals (e.g., the principal investigator or co-principal investigator).

**DoD Component:** A Military Department, Defense Agency, DoD Field Activity, or organization within the Office of the Secretary of Defense.

**Entity:** An organization, including government organizations, non-governmental organizations, and private corporations, whether foreign or domestic.

**Entity in a Non-Foreign Country of Concern:** An organization, including government organizations, non-government organizations, and private corporations, incorporated in a non-foreign country of concern or physically located in a non-foreign country of concern.

**Extramural Research Institution:** Any institution of higher education, independent research institution, Federally Funded Research and Development Center, or any other entity where DoD-funded research and development is conducted. Extramural research institutions do not include DoD laboratories or other laboratories that are owned and operated by the Federal Government.

**Foreign Country of Concern:** The People’s Republic of China, the Democratic People’s Republic of Korea, the Russian Federation, and the Islamic Republic of Iran.

**Foreign Entity of Concern:** As defined in section 10638(3) of the CHIPS and Science Act of 2022 (Public Law 117-167), a foreign entity that is:

- Designated as a foreign terrorist organization by the Secretary of State under section 219(a) of the Immigration and Nationality Act (8 United States Code (U.S.C.) 1189(a));
- Included on the list of specially designated nationals and blocked persons maintained by the Office of Foreign Assets Control of the Department of the Treasury (commonly known as the SDN List);
- Owned by, controlled by, or subject to the jurisdiction or direction of a government of a foreign country that is a covered nation (as such term is defined in section 4872 of Title 10, United States Code);

- Alleged by the Attorney General to have been involved in activities for which a conviction was obtained under:
  - Chapter 37 of title 18, U.S.C. (commonly known as the Espionage Act)
  - Section 951 or 1030 of title 18, U.S.C.;
  - Chapter 90 of Title 18, U.S.C. (commonly known as the Economic Espionage Act of 1996);
  - The Arms Export Control Act (22 U.S.C. 2751 et seq.);
  - Section 224, 225, 226, 227, or 236 of the Atomic Energy Act of 1954 (42 U.S.C. 2274, 2275, 2276, 2277, and 2284);
  - The Export Control Reform Act of 2018 (50 U.S.C. 4801 et seq.); or
  - The International Emergency Economic Powers Act (50 U.S.C. 1701 et seq.); or
- Determined by the Secretary of Commerce, in consultation with the Secretary of Defense and the Director of National Intelligence, to be engaged in unauthorized conduct that is detrimental to the national security or foreign policy of the United States.

**Foreign Government-Connected Entity:** An organization, including government organizations, non-governmental organizations, and private corporations, owned or operated directly or indirectly by a foreign government.

**Fundamental Research:** As defined in National Security Decision Directive 189, dated September 21, 1985, fundamental research is basic and applied research in science and engineering conducted at colleges, universities, and laboratories, the results of which ordinarily are published and shared broadly within the scientific community.

**Fundamental Research Project Proposal:** A proposal for funding to be provided to an individual or entity, in whole or in part, by a Federal research agency to carry out fundamental research activities through grants, cooperative agreements, contracts, and other transactions.

**Malign Foreign Talent Recruitment Program:** As defined in section 10638(4) of the CHIPS and Science Act of 2022 (Public Law 117-167), the term “malign foreign talent recruitment program” means:

- Any program, position, or activity that includes compensation in the form of cash, in-kind compensation, including research funding, promised future compensation, complimentary foreign travel, things of non de minimis value, honorific titles, career advancement opportunities, or other types of remuneration or consideration directly provided by a foreign country at any level (national, provincial, or local) or their designee, or an entity based in, funded by, or affiliated with a foreign country, whether or not directly sponsored by the foreign country, to the targeted individual, whether directly or indirectly stated in the arrangement, contract, or other documentation at issue, in exchange for the individual:
  - Engaging in the unauthorized transfer of intellectual property, materials, data products, or other nonpublic information owned by a United States entity or developed with a Federal research and development award to the government of a foreign country or an entity based in, funded by, or affiliated with a foreign country regardless of whether that government or entity provided support for the development of the intellectual property, materials, or data products;
  - Being required to recruit trainees or researchers to enroll in such program, position, or activity;
  - Establishing a laboratory or company, accepting a faculty position, or undertaking any other employment or appointment in a foreign country or with an entity based in, funded by, or affiliated with a foreign country if such activities are in violation of the standard terms and conditions of a Federal research and development award;
  - Being unable to terminate the foreign talent recruitment program contract or agreement except in extraordinary circumstances;
  - Through funding or effort related to the foreign talent recruitment program, being limited in the capacity to carry out a research and development award or required to engage in work that

would result in substantial overlap or duplication with a Federal research and development award;

- Being required to apply for and successfully receive funding from the sponsoring foreign government's funding agencies with the sponsoring foreign organization as the recipient;
  - Being required to omit acknowledgment of the recipient institution with which the individual is affiliated, or the Federal research agency sponsoring the research and development award, contrary to the institutional policies or standard terms and conditions of the Federal research and development award;
  - Being required to not disclose to the Federal research agency or employing institution the participation of such individual in such program, position, or activity; or
  - Having a conflict of interest or conflict of commitment contrary to the standard terms and conditions of the Federal research and development award; and
- A program that is sponsored by:
    - A foreign country of concern or an entity based in a foreign country of concern, whether or not directly sponsored by the foreign country of concern;
    - An academic institution on the list developed under section 1286(c)(8) of the John S. McCain NDAA for FY 2019 (10 U.S.C. 2358 note; Public Law 115-232); or
    - A foreign talent recruitment program on the list developed under section 1286(c)(9) of the John S. McCain NDAA for FY 2019 (10 U.S.C. 2358 note; Public Law 115-232).

**Mitigation of Research Security Risk:** The action of reducing the severity or the effects of research security risks identified in a fundamental research project proposal. What mitigation is required is a fact-based determination to be made at the program level on a case-by-case basis.

**Participation in a Malign Foreign Talent Recruitment Program:** Affiliation with or membership in a malign foreign talent recruitment program, including a contractual or other binding agreement between an individual and a malign foreign talent recruitment program; an individual reporting participation in a malign foreign talent program in a research proposal, curriculum vitae, or resume; or an individual's identification in a publication listing the individual and a malign foreign talent recruitment program.

**Proposing Institution:** An institution of higher education, independent research institution, Federally Funded Research and Development Center, or any other entity that submits a fundamental research project proposal for DoD funding, in whole or in part.

**Research and Development:** The creative and systematic work undertaken to increase the stock of knowledge and to devise new applications of available knowledge. This includes, but is not limited to, research in economics, education, linguistics, medicine, psychology, physical sciences, social sciences, statistics, and research involving human subjects or animals regardless of the funding appropriation used to support it.

**Research Integrity:** The standards of research that promote objective research with collaborations that are open, transparent, merit-based, and reciprocal in nature. Research collaborations conducted with integrity are expected to disclose all financial and time obligations of the persons involved in the research, hire individuals or recruit students to participate in the research based on merit, and respect rules governing intellectual property.

**Research Security Risk:** An increased likelihood that research and development efforts or results will be misappropriated to the detriment of national or economic security, as well as related violations of research integrity and foreign government interference.