

**The following guidance provides examples of information that should be provided to the Office of the Vice Provost for Research and the Office of the Vice Provost for International Affairs (together “the Provost”), [for Provostial Review of New Projects or Grants](#) process.**

If internal deadlines and requirements are not met and the Provost does not have sufficient time for a thorough review, the proposal will not be approved.

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**Countries of Concern (CoC):**

Countries of Concern (CoC) include [Comprehensively Embargoed Countries](#) (App. II, Sec. I), as well as those countries defined as “Adversary Foreign Governments” under Sec. 6745(a)(1) of the National Defense Authorization Act (2020) ([see p.1045 of NDAA](#)). Provostial Review is required for all projects involving a CoC (See also [FAQ 25](#) of the International Collaboration and Activities Approval (ICAA) resources). Review by the Unit’s<sup>1</sup> [Export Control Administrator](#) (ECA) is also required for projects involving a CoC; the ECA should be notified prior to the Provost, in order to complete an initial screening.

Depending on the proposed foreign activities, other reviews may also be required as described in this document and the [ICAA Guidance](#)<sup>2</sup>. Additionally, if researchers have been asked to sign a contract with an entity in a CoC (e.g., visiting research agreement, non-disclosure agreement, visa sponsorship agreement), such contract should be reviewed by the Unit prior to finalization to ensure any terms and conditions are consistent with University and local policies, including any required screenings, assessments, or other approvals.

**Information to be provided to Provost:**

- i. Scientific rationale for involving a CoC (e.g., Country A has a telescope capable of seeing necessary distance, scientist with relevant samples is in Country B, post-doc recently left Harvard for Country C Institute of Technology)
  - a. The nature and history of the relationship should be considered – is this the first time the entities have collaborated, exchanged materials, etc.?
  - b. The justification that services, activities, etc. are less expensive in a CoC may not be an acceptable rationale
- ii. Confirmation that underlying technology and all in-country partners (e.g. collaborators, vendors, research locations) – both individuals and entities – have been screened by the Unit’s Export Control Administrator pursuant to the Export Control Guidance on International Collaborations, as well as any Unit-level processes
- iii. Confirmation that the PI’s portfolio has been reviewed to determine the impact of the proposal – if any – if funded (e.g. need to firewall work from NASA project, requisite disclosures to relevant sponsors)

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<sup>1</sup> “Unit” represents the relevant department, center or local level managing unit (depending on the specific infrastructure). Often this is a school.

<sup>2</sup> The CoC process for the ICAA component “*Foreign Nationals (Required only for NASA, DoE, and DoD proposals)*” only requires that the Unit confirm (i) whether the sponsor documentation includes any restrictions on foreign nationals; and (ii) whether the individual receives funding or other support (scholarship, stipends, in-kind, etc.) from their country of citizenship (that may need to be reviewed by the ECA or disclosed to the sponsor).

- iv. Details regarding the type of technology, materials and/or data that may be exchanged; and
    - a. COMs, IACUC and/or EH&S approval may also be required
    - b. If sensitive data will be exchanged, OSP/ORAs (per [Data Use Agreement Policy](#)) and/or Information Security (per [Harvard Research Data Security Policy](#)) may need to be involved at award stage
    - c. If [materials will be exchanged](#), OTD may need to be involved
  - v. Description of whether travel to a CoC, or travel of individuals from a CoC is contemplated.
    - a. Global Support Services (and potentially [Student International Travel Policy](#)) should be consulted for [High Risk](#) areas
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**Relevant resources:**

[Export Controls Guidance: Specially Designated National List Screening Process and Monitoring](#)

[Graduate & Professional Student International Travel Policy](#)

[International Project Planning Guidance](#)

[International Collaborations and Activities](#)

- [Additional Guidance](#)
- [Training and Job Aids](#)
- [Checklist](#)

[Research Materials Transport and Shipping Manual](#)

*For questions about the CoC process, please contact your [Unit's ECA](#), or [Rachel Talentino](#)*