Faculty Guidance on Academic Activities

This guidance is intended to help faculty identify when academic activities involving Foreign Adversary Nations[1] or individuals affiliated with institutions in those locations may be prohibited, may require additional review, or may be allowed with appropriate safeguards. Purdue values international engagement and open academic exchange, but some activities create heightened concerns. Faculty should use this document before committing to any activity. When in doubt, seek review before proceeding.

Core Principles

1. **Do not assume an activity is permissible because it is academic, unpaid, remote, informal, or professional service.** Some activities create significant risk even when no money changes hands.
2. **Activities funded by or routed through a Foreign Adversary Nation are restricted.** Faculty should not accept funding, compensation, gifts, awards, honoraria, travel support, or other benefits from such sources unless expressly approved through the appropriate University ROA process in PERA.
3. **Activities involving federal research, restricted research results, export-controlled information, unpublished data, confidential information[2], or Purdue intellectual property require review and approval.**
4. **Faculty should structure activities to preserve openness, transparency, and Purdue oversight.** Activities are more likely to be approved when they use ordinary University processes, involve publicly available information, provide clear benefit to Purdue, and include practical safeguards.
5. **Disclosure is not the same as approval.** Submitting a Reportable Outside Activity via PERA, a travel request through Concur, or other intake mechanism starts the review process; it does not authorize the activity unless approval is granted.

Primary Questions Faculty Should Consider Before Requesting Approval

1. Have I identified all people, institutions, sponsors, funders, and funding sources involved?
2. Is any person, institution, sponsor, funder, or activity connected to a Foreign Adversary Nation or Entity?

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[1] Purdue Foreign Adversary Nations (III.B.7) Policy: https://www.purdue.edu/vpec/policies/ethics/iiib7/

[2] Confidential, as used throughout this document, is defined as information that is not intended for public release from Purdue University.

3. Will I receive or provide money, travel support, honoraria, gifts, awards, in-kind support, data, equipment, software, or other benefits?
4. Does the activity involve federal research funds, sponsor obligations, restricted research results, unpublished data, confidential information, export-controlled technology, Purdue intellectual property, or Purdue systems?
5. Could the activity create an outside appointment, dual employment relationship, advisory obligation, fiduciary duty, conflict of commitment, or appearance of institutional endorsement?
6. Can the activity be restructured to use public information only, remove prohibited funding, use a formal Purdue process, or add mitigation measures?
7. Have I submitted the required disclosure, request, or intake form and received approval before proceeding?

Activities That Are Generally Not Permitted

The following activities should be treated as prohibited unless a responsible University office specifically determines otherwise under an applicable policy or exception process:

- Participating in a foreign recruitment program affiliated with or organized by a Foreign Adversary Nation.
- Accepting awards, honoraria, compensation, travel support, or other benefits from institutions or sources in a Foreign Adversary Nation, except where a specific University review process determines the activity is permissible.
- Authorizing the transfer, licensing, sublicensing, or other disposition of Purdue intellectual property to a Foreign Adversary Entity.
- Hosting a visiting scholar who is funded by a Foreign Adversary Nation or Foreign Adversary Entity.
- Providing online education specifically to individuals ordinarily residing in a Foreign Adversary Nation when the activity involves Purdue educational offerings, technology, or instructional content subject to university review.
- Study abroad programs with institutions in a Foreign Adversary Nation.
- Proceeding with activities that involve federal research work, federal research funds, restricted research results, export-controlled technology, unpublished research data, confidential information, or sponsor-restricted materials without prior approval.

Activities That Require Case-by-Case Review

Many activities are not automatically prohibited but require review before the faculty member commits to participate. These activities may be approved when the risk can be

mitigated and there is a clear academic, research, educational, or strategic benefit to Purdue.

- Sabbaticals, research-in-residence experiences, change-of-duty assignments, or other remote work while located in a Foreign Adversary Nation.
- Honorific, adjunct, visiting, advisory, or similar appointments with institutions in a Foreign Adversary Nation, as long as there is no funding from the Foreign Adversary Entity and there is no U.S. federally funded research involved.
- Business ownership, board service, advisory council service, or fiduciary roles connected to entities in a Foreign Adversary Nation.
- Unfunded collaborations with individuals affiliated with institutions in a Foreign Adversary Nation when there is no University agreement governing the activity.
- Advising students affiliated with institutions in a Foreign Adversary Nation when the students are not visiting Purdue through a formal Purdue program.
- Professional service, committee service, research review panels, project councils, conference organizing, or conference presentations connected to a Foreign Adversary Nation.
- Student travel, credit-bearing internships, or other educational activities in a Foreign Adversary Nation.

Ways to Structure an Activity for Approval

If an activity raises concerns, faculty should consider whether it can be modified before requesting approval. The following changes may reduce risk and make an activity more likely to proceed through ordinary University channels:

- Limit the activity to publicly available information, published research, open educational content, or general scholarly exchange.
- Avoid sharing unpublished data, confidential information, proprietary information, export-controlled information, sponsor-restricted information, or statutorily restricted research results.
- Remove Foreign Adversary Nation or Foreign Adversary Entity funding, compensation, travel support, honoraria, gifts, or in-kind support.
- Use a formal Purdue agreement, approved visitor process, approved student program, or standard University contracting process rather than informal arrangements.
- Clarify that the faculty member is acting in a personal scholarly capacity only when appropriate, and avoid use of Purdue title, logo, endorsement, resources, or authority unless approved.

- Define the scope, participants, location, funding source, expected deliverables, information to be exchanged, and Purdue benefit in writing.
- Obtain sponsor approval when the activity relates to a federal project, federal funds, project personnel, research results, or sponsor-funded travel.
- Document mitigation measures, such as export-control review, technology control plans, data-access limits, publication-only boundaries, visitor screening, or travel-security review.