On August 15, 2024, NIH released a [decision matrix](https://grants.nih.gov/sites/default/files/NIH%20Decision%20Matrix%20for%20Assessing%20Potential%20Foreign%20Interference%20for%20Covered%20Individuals%20or%20Senior%207%2026%2024%20clean.pdf)  to assist agency staff in assessing grant applications and ongoing awards for potential foreign interference.  Factors considered include: (1) current or past participation in a malign foreign talent recruitment program, which is prohibited by law, (2) undisclosed current or prior funding from a foreign country of concern (FCOC, or connected entity – currently China, Russia, North Korea, and Iran – higher risk) or other foreign country (lower risk) and, (3) Indicators of an undisclosed current or past affiliation with an institution or entity located in or connected to a FCOC (higher-risk/mitigation) or foreign country (lower-risk/mitigation).  Per the matrix, mitigation is either required, recommended, suggested, or not required based on the timing of the engagement (active/current vs. within the past 5 years) and if accurate and complete disclosure information was provided.  In circumstances where mitigation is required, some conditions that could be implemented include: (1) specific award conditions, (2) modification of terms and conditions of award, (3) suspension, termination, or withdrawal of an award, (4) conversion from advance payment to reimbursement, and (5) recovery of funds.

# In a blog post announcing the matrix, Mike Lauer, Deputy Director for Extramural Research, notes that NIH “strongly supports [properly conducted and principled international collaborations](https://www.nsf.gov/news/special_reports/jasonsecurity/JSR-19-2IFundamentalResearchSecurity_12062019FINAL.pdf) that are integral for our country to remain competitive.” Regarding the potential for discrimination, the post indicates that NIH “will continue to ensure that these compliance reviews do not stigmatize or unfairly treat members of the research community, including members of ethnic or racial minority groups, or discriminate with respect to national origin or identity.” The post highlights a statement released by the NIH Director, [NIH supports our valued Asian American, Asian immigrant and Asian research colleagues](https://www.nih.gov/about-nih/who-we-are/nih-director/statements/nih-supports-our-valued-asian-american-asian-immigrant-asian-research-colleagues), indicating that “with these actions, I hope to ensure that NIH-funded institutions cultivate a welcoming and supportive environment for Asian researchers, as well as researchers from all other backgrounds.”