

**Charge to the Global Engagement Review Program Committee**  
**December 12, 2019**

## Global Engagement Review Program

International relationships are a central and valued component of the core teaching, research, and public service mission of the University. These relationships start with the students, faculty, and staff from other countries who are an integral part of the Stanford community. They also include non-U.S. sources of gifts, industrial affiliate programs, and sponsored research which make possible many of the activities of the University. Non-Stanford research partners—institutions and individuals—from outside the United States who collaborate with all elements of our Stanford community make fundamental contributions to our research and teaching. These relationships are overwhelmingly positive for Stanford, and their global character is central to Stanford's values and ethos.

Nonetheless, some aspects of the University's international relationships have the potential to expose the Stanford community to a variety of risks that could undermine Stanford's mission and values. These risks are real and lasting and include: legal or regulatory sanctions and/or loss of funding resulting from violations of federal or other applicable laws, including export controls, limits on foreign investment, trade sanctions, and federal grant conditions; theft of valuable intellectual property; unauthorized access to and compromise of Stanford's information technology systems; and infringement of Stanford's core policies and values, including openness in research, nondiscrimination, and academic freedom. This memo describes the proposed adoption and implementation of a new and centralized approach to vetting and evaluating these potential foreign influence risks in the context of maintaining our open and welcoming community. Importantly,

- (1) The Global Engagement Review Program (GERP) will coordinate input from multiple offices that already advise on various aspects of foreign engagements, and thereby will strive to simplify the process for faculty.
- (2) GERP will advise decision makers, not replace existing decision-making authority (for example, an assessment of a foreign gift will yield a report to the OOD, and the VP of Development or their deputies would typically then make a final decision about accepting the gift on behalf of the University president).
- (3) GERP will operate as described in this memo for one year as a pilot. During and after the pilot, the program will be evaluated on whether it is meeting its objective to efficiently assess and inform university decision makers on risks associated with foreign engagements.

## Intake

Over time, GERP will develop intake criteria. To launch the program at the beginning of 2020, GERP will initially evaluate programs at the request or recommendation of faculty or administrators.

## Stage 1

When a proposed engagement is first referred to GERP, the GERP Coordinator (to be hired) will review and rapidly triage the engagement, consulting as needed with relevant offices and subject matter experts that would more formally be included in Stage 2. Many if not most engagements can likely be handled quickly, sparing faculty members from delays, uncertainties about compliance, and the administrative burden of consulting with multiple offices. It will often be the case that in the judgement of the GERP Coordinator, no further review is required and the project can proceed.

## Stage 2

When further review is indicated, the GERP Coordinator will work with the GERP Staff Committee, a group of experienced professional staff in key project areas including finance, law, tax, export control, and operations. The standing Staff Committee will include the University Export Control Officer, the Director of University Conflicts of Interest Office, representatives from each of the Office of the Chief Information Officer, the Office of Development, and the Research Management Group, and (in an ex officio role) the Office of the General Counsel. Other offices also have relevant subject matter expertise. As needed, the Coordinator may reach out to representatives from Global Business Services, the Research Compliance Office, the Office of International Affairs, the Office of Technology Licensing, the Industrial Contracts Office, the Research Management Group, Engineering Research Administration, the Office of Research Administration, SLAC, and the Office of the Chief Risk Officer as it deems appropriate on a case-by-case basis. After reviewing the proposed project, the GERP Coordinator will provide the principal investigator (PI) with information and advice on anticipated risks and ways to reduce or avoid them. The PI will then decide whether to modify certain aspects of the proposed project in response. It will often be the case that in the judgement of the GERP Staff Committee, no further review is required and the project can proceed. On rare occasions, the Staff Committee may not be minded to recommend proceeding with a foreign engagement; if the faculty still wish to pursue the engagement, it would then proceed to further review.

## Stage 3

A third body (hereinafter “Full Committee”) will add to the Staff Committee three faculty whose selection is described below. The Full Committee will evaluate the risks and benefits of specific proposed engagement when those engagements are referred by the Staff Committee for further review. In addition, the Full Committee will establish principles and processes for future reviews. Specifically, the Full Committee will:

1. develop, with the GERP Coordinator, a process for affected faculty to present information to the GERP Committee as part of the review process;
2. receive regular reports from the GERP Coordinator about recommendations made at earlier stages;
3. provide guidance and recommendations about proposed individual engagements to the appropriate decision maker (faculty researchers and/or senior leadership);
4. determine evaluation criteria and associated thresholds, if any, to guide further reviews;

5. advise and be advised by the GERP Coordinator on how to improve the GERP review process;
6. propose revision and enhancement to the University's High Risk Entity Protocol as outlined in a February, 2019 [memo](#) from the Vice Provost and Dean of Research (VPDoR) to the Stanford community; and
7. report informally when needed, and in a memo after the first six months, to VPDoR and to C-RES on the GERP process, including any recommendations for improvements and modifications.

This committee will meet as needed, either virtually or in person. During the pilot phase, the committee will meet frequently. When the committee meets in full, members of the University Cabinet or their delegates may, at the discretion of the Chair, be invited to join ex officio so that the Full Committee can provide context for their recommendations. Relevant Cabinet members might include, for example, the VPDoR, the VP of Development, and the president's Chief of Staff.

To enable the pilot to proceed quickly and to coordinate with any needed Faculty Senate review, the VPDoR will invite the following three faculty to serve: Ken Scheve (serving as chair of GERP, after serving as co-chair of the Joint Committees on Foreign Interference in 2019); Tim Stearns (Faculty Senate Chair); and Jen Dionne (C-RES Chair). For identification of committee members longer-term, either after the pilot phase or if any of these three cannot serve during the full pilot phase, the VPDoR will also ask C-RES to discuss and evaluate the advantages and disadvantages of selecting faculty for GERP, eg selection by the Committee on Committees, appointment by the Committee on Research, selection by the VPDoR or the Provost, or some combination thereof. Consideration should be given to having one or all of the faculty be selected from members of C-RES.