

INTERNATIONAL ENGAGEMENT FRIENDLY REMINDERS

ERIK – SECURE RESEARCH | THE OHIO STATE UNIVERSITY

U.S. GOVERNMENT PROHIBITED ENTITY LIST PROHIBITIONS

Several federal research sponsors have announced prohibitions on collaborations with restricted entities. The entity lists that are considered vary by agency. The NSF SECURE Center created a summary table that shows how various entity lists are used across federal agencies. (See https://go.osu.edu/prohibited_entity_lists). Summaries of specific agency prohibitions are below.

Department of War

https://go.osu.edu/dod_decision_matrix

In March 2026, the Department of War updated its Decision Matrix to Inform Fundamental Research Proposal Mitigation Decisions. The updated matrix:

- Expands the prohibited entity lists that DoW considers from 4 lists to 13 lists;
- Prohibits (rather than discourages) collaboration with a [1260H List](#) organization (i.e., Chinese military companies); and
- Requires (rather than suggests) mitigation if a covered individual is listed as a co-author on a publication with co-authors who are affiliated with a prohibited entity at the time of review. (Note that the entity may have been added to a prohibited list after the collaboration concluded.)

National Science Foundation

https://go.osu.edu/nsf_dcl_entities

In July 2026, NSF published a Dear Colleague Letter notifying the research community of a forthcoming (FY27) policy that will:

- Prohibit NSF funds from being expended on collaboration with entities on 12 U.S. restricted entity lists;
- Prohibit senior/key personnel from holding an appointment or position with, or receiving research support from, a restricted entity; and
- Prohibits senior/key personnel from collaborating with a restricted entity, or employee thereof, on research funded by their NSF award.

Department of Energy

https://go.osu.edu/doe_prohibited_entities

The Department of Energy is statutorily prohibited from providing funding to entities on three prohibited entity lists:

- Department of War 1260H List (https://go.osu.edu/ndaa_1260h)
- Department of Commerce BIS Entity List (https://go.osu.edu/bis_entity)
- UFLPA Entity List (https://go.osu.edu/uflpa_entity)

U.S. Department of Agriculture

https://go.osu.edu/usda_tc

USDA General Terms and Conditions require certification that the grant recipient will not engage with or provide award funding to entities on 15 prohibited entity lists.

QUESTIONS? Visit https://go.osu.edu/intl_engagement for up-to-date information or email the international engagement team at intlresearcherengagement@osu.edu with questions.

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FEDERAL GOVERNMENT FOCUS ON PROHIBITED ENTITIES

U.S. House Select Committee on China

https://go.osu.edu/china_select_cmte

Over the last year, the bipartisan Select Committee published a series of investigative reports that were focused on research publication data. The reports identify certain publication characteristics as perceived evidence that the PRC is exploiting U.S. universities and access to U.S. government-funded research to fuel the PRC's military and technological success. Specifically, the publications focus on the following characteristics:

- Co-author affiliations with entities that appear of U.S. prohibited entity lists, and
- Acknowledgement of U.S. funding and/or foreign funding.

To date, the Select Committee has published three investigative reports. Each report is focused on publication data related to a specific federal funding agency:

- Department of Defense report: https://go.osu.edu/select_comm_dow
- Department of Energy report: https://go.osu.edu/select_comm_doe
- NASA report: https://go.osu.edu/select_comm_nasa

The reports generally focus on perceived shortcomings within the funding agencies and encourage passage of federal research security legislation and policies. Researchers should review Office of Secure Research authorship credit and support guidance to avoid unnecessary scrutiny:

https://go.osu.edu/publication_guidance.

Department of War Research Security Audits

https://go.osu.edu/dow_audit

On August 17, 2026 the Department of War (“DoW”) issued notifications to 30 institutions. The notifications directed the institutions to initiate immediate and comprehensive reviews of their academic, financial, and research collaborations with foreign entities that appear on the DoW 1286 List (https://go.osu.edu/ndaa_1286). Reportedly, DoW identified the 30 institutions by flagging mentions of 1286 entities on the institutions’ websites, regardless of whether the activity was related to research or federal funding, or whether the activity had concluded. Ohio State did not receive a DoW notification.

Institutions that received the DoW notification had two weeks to report on their findings and to implement mitigation plans, including termination of ‘problematic partnerships.’ The notification states that institutions that failed to comply with the audit requirement risked eligibility for future federal research funding.

Considering engaging with an entity located in China, Russia, Iran or N. Korea?

Secure Research recommends submitting a response to the [International Risk Assessment Survey](#) prior to engaging with an entity located in a foreign country of concern. The International Engagement and Export Control Teams will screen foreign entities against U.S. government lists and provide tailored guidance regarding the activity and any potential risks.