

Compromised Independence

CCP Influence at Harvard University

**THE SELECT COMMITTEE ON THE
STRATEGIC COMPETITION BETWEEN
THE UNITED STATES AND
THE CHINESE COMMUNIST PARTY**

&

**THE COMMITTEE ON EDUCATION
AND THE WORKFORCE**



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EXECUTIVE SUMMARY

On a gloomy spring day in April 2024, People's Republic of China (PRC) Ambassador Xie Feng gave a speech on Harvard University's (Harvard) campus to proclaim that the Chinese Communist Party (CCP) has always been a champion of democracy. The dreary weather reflected the dismal state of Harvard's commitment to "veritas," the school's motto meaning "truth" in Latin. Harvard had an opportunity to confront Xie's lie with truth. It failed to do so. Harvard faculty looked on as Xie spouted CCP talking points. Then, a few brave souls stood up in the crowd. Unafraid of the CCP's might, they held up signs as a symbolic and physical barrier to the propaganda spewing from the stage. Rather than celebrate the act of protest Harvard teaches, Harvard professors looked on as another student grabbed the protester by the arm and dragged them out as shown below.



Figure 1: Photo Showing Student Holding Protest Banner at Chinese Ambassador Xie Feng's Harvard University Speech.

In a debrief afterward, a Harvard Academic Assistant Dean noted that a faculty member told the Dean the physical violence was carried out at the direction of a Harvard faculty member because, "they could not have those disruptions during the Ambassador talk."¹ Rather than seek justice for this blatant violation of the protester's First Amendment rights, Harvard chose to take no action against

¹ House Sel. Comm. China, *Email from Assistant Dean of Student Affairs to Dean Martin West*, https://chinaselectcommittee.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/HRVD-HSC-00247_0.pdf.

the person committing the physical assault. In the communication to the assaulter, Harvard Dean Martin West wrote “I understand that your intentions were to prevent the event from being further disrupted and that you had received guidance from event organizers to intervene as you did.”² The situation showed a concerted effort by Harvard to prioritize CCP political sensitivities over American values.

Unfortunately, Harvard chose to prioritize the CCP beyond this single incident. A joint investigation by the House Select Committee on China and the House Committee on Education and Workforce (collectively “the Committees”) identified a system where deference to CCP interests overrides American economic, technological, and national security interests. This is not confined to a single individual, but instead pervasively corrupts the organization’s integrity. For example, Harvard’s Chan School of Public Health (Chan School) organized and sponsored, and Harvard paid for,³ a health executive education likely attended by a Chinese paramilitary organization sanctioned by the Treasury Department (Treasury). When revelations emerged that a Treasury sanctioned entity likely attended this executive education, the professor’s first concern was how the reporting would affect Harvard’s relationship with the Chinese government and academia as well as the potential safety issues that true reporting could generate in China. Not whether Harvard violated federal law. Not whether Harvard undermined U.S. foreign policy. Not whether Harvard enabled conduct tied to genocide. That instinct speaks volumes about misplaced priorities and a profound failure of institutional judgment.

In another example of Chinese influence chilling Harvard faculty, a senior Harvard compliance official during a transcribed interview for this investigation hesitated in affirmatively stating that the Chinese government is engaged in genocide in the Xinjiang region despite legions of reporting and official U.S. government determinations on the issue. After conferring with his lawyers, the best he could muster was that he did “not dispute the assertion that the Chinese Government is engaged in genocide against the Uyghurs.” When asked whether Harvard should be conducting research with institutions linked to the Chinese military, a lead compliance official at the Chan School refused to categorically rule it out.

Harvard’s collaboration with China is so widespread that its “Frequently Asked Questions” document issued by the compliance office includes a question on collaboration with China to which the answer begins “There is nothing to prevent you from collaborating with former group members that are now

² House Sel. Comm. China, *Email from Dean Martin West to Redacted*, https://chinaselectcommittee.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/HRVD-HSC-00252_0.pdf.

³ The direct origin of the funds is unclear; the current evidence shows part of the funding for the conference came from Harvard’s bank accounts.

professors in China. . . “ then details a series of export control and sanctions considerations.⁴ One consideration not mentioned is American national security.

Harvard furthers the CCP’s interests across multiple domains, including the CCP’s technological and scientific aspirations. The Committees identified a series of research relationships between Harvard-affiliated researchers and researchers at universities linked to China’s defense research and industrial base.⁵ This research collaboration focused on areas that have clear civilian and military applications such as robotics.

As this report lays out, Harvard’s furthering of CCP interests appears consistently and systemically across Harvard as it sought to further its research interests at the expense of American national security. Unfortunately, many of the research relationships detailed in this report remain legal, operate with minimal transparency, and persist despite clear strategic risk to U.S. national security. Harvard can take proactive measures to ensure its faculty, research, and institutional integrity do not further China’s defense research and industrial base. But it chooses not to. At a minimum, this includes prohibiting research relationships with entities that appear on U.S. government restricted or sanctioned entity lists. These lists already reflect determinations by the U.S. government that such entities pose national security risks or are involved in activities contrary to U.S. interests. Continuing to permit research relationships with these entities, even where technically legal, exposes both the institution and federally funded research to exploitation. Until Congress enacts the Securing Innovation and Research from Adversaries (SIRA) Act⁶ and the Defending Education Transparency and Ending Rogue Regimes Engaging in Nefarious Transactions (DETERRENT) Act,⁷ U.S. research institutions will continue to collaborate with entities listed by the United States government and advance dual-use technologies that may ultimately be used against the United States or allied forces.

This is not the Committees’ first investigation of Harvard. In October 2024, the Select Committee and the House Committee on Education and Workforce investigated Harvard’s failure to hold a pro-CCP agitator accountable for physically assaulting an anti-CCP protester as detailed above. The natural next question is: why does Harvard refuse to act against China? The likely answer: money.

⁴ HRVD-HSC-000000958 at 4.

⁵ Any PLA organ, “Seven Sons of National Defense (国防七子) university, “Seven Sons of Ordinance (Arms) Industry” (军工七子) University, schools co-administered by the State Administration for Science, Technology, and Industry for National Defense, defense-designated laboratories, state-owned defense conglomerates, and the intelligence and security apparatus.

⁶ Rep. John Moolenaar, Amendment to Rule Comm. Print 119-33, 119th Cong. (2026), https://amendments-rules.house.gov/amendments/research_ndaa_amdt_xml260618142144799.pdf.

⁷ H.R. 1048, 119th Cong. (2025) (DETERRENT Act), <https://www.congress.gov/bill/119th-congress/house-bill/1048/text>.

Section 117 of the Higher Education Act of 1965 requires institutions to disclose gifts or contracts with foreign sources that alone or combined are valued at \$250,000 or more in a calendar year.⁸ The Trump Administration released the Section 117 data dashboard showing Harvard received substantial funds from China.⁹ According to that dashboard, Harvard University received the most money from China of any American university at more than \$600M.¹⁰ The below is a screenshot taken of that database.

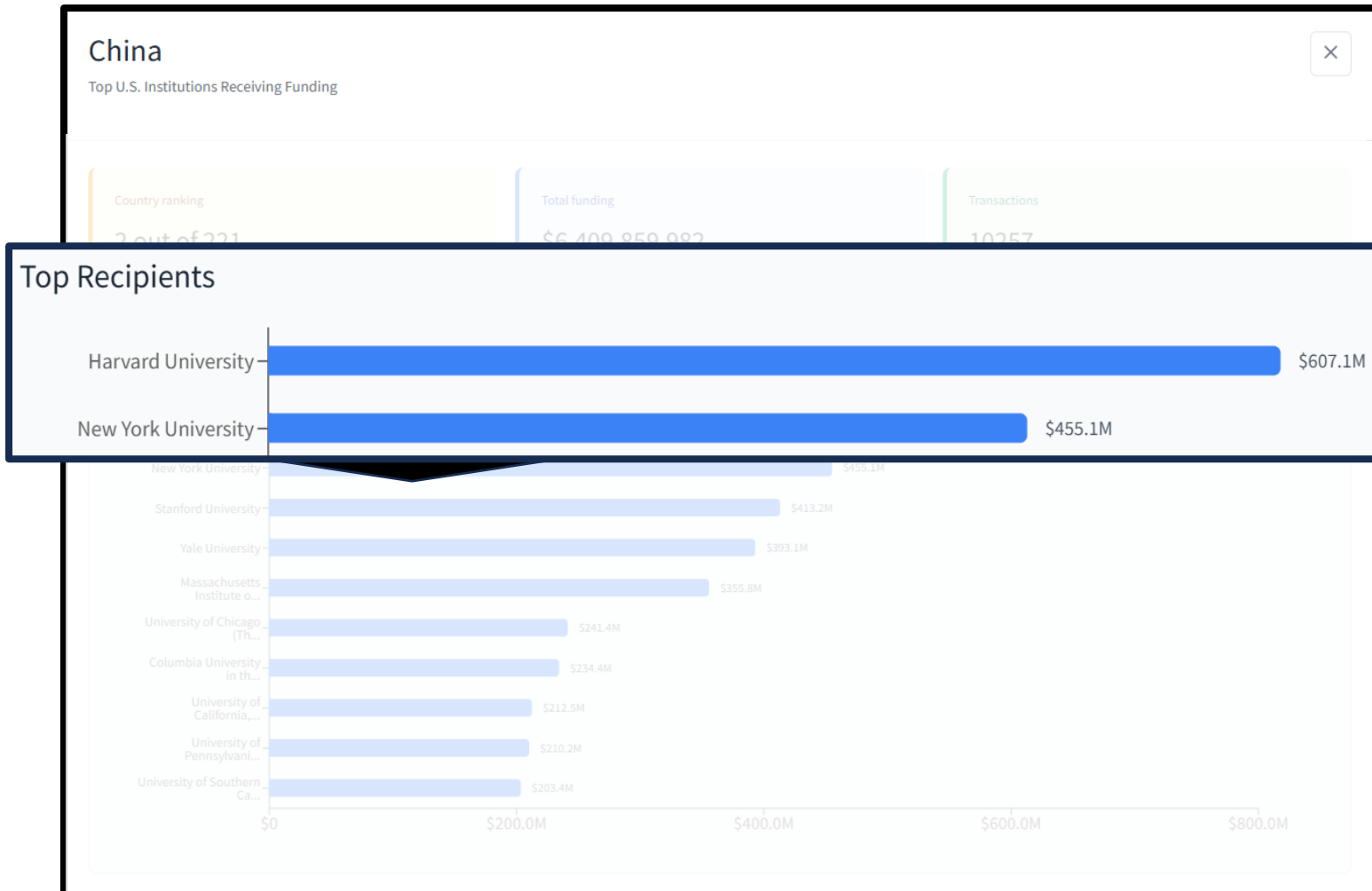


Figure 2 – Foreign Funding Graphic Provided by the U.S. Department of Education.

Section 117 provides much-needed transparency, but unfortunately the statute has not been updated in over 30 years. The loose statutory language and poor federal enforcement resulted in institutions underreporting foreign gifts and circumventing Section 117's requirements.

⁸ *Id.*

⁹ Section 117 Foreign Gift & Contract Reporting, Dep't of Ed., <https://www.foreignfundinghigher.gov/>, (last visited February 12, 2026).

¹⁰ *Id.*

For example, Harvard created a nonprofit called “Harvard Global” that could circumvent the restrictions in Section 117. The following screenshot from its website shows its key “services” include, serving as a conduit when Harvard University is “unable to accept the sponsor’s terms due to legal or financial reasons, we may be able to act as the proposal applicant and awardee. Although we are formally awarded and accept the sponsored funding, Harvard University researchers perform all research activities using University resources, all under contract to us for the term of the award.”¹¹ One of the places Harvard Global operates is in PRC-controlled Hong Kong.

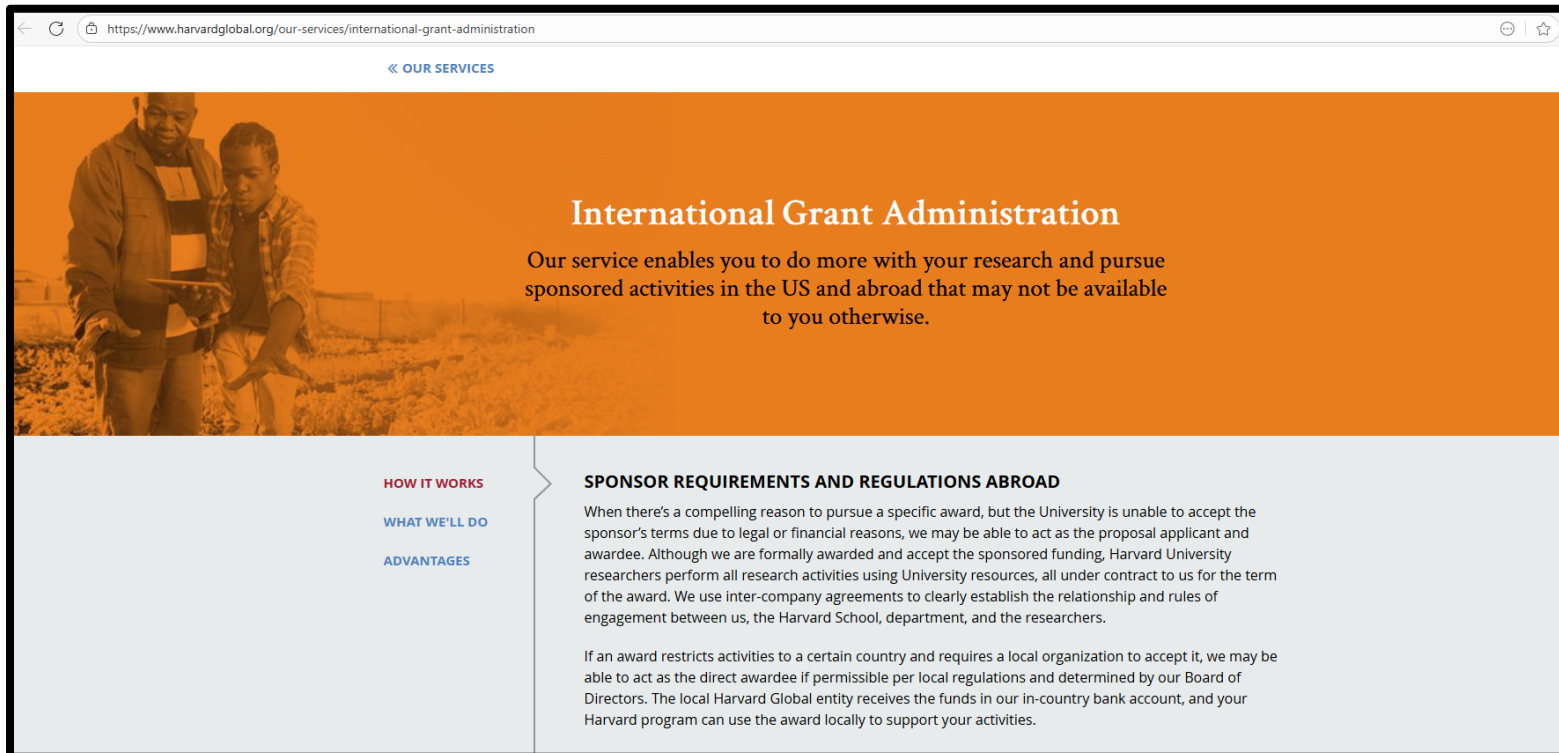


Figure 3 – Screenshot from the Harvard Global Webpage Showing Its Services Provided.

This evidence leads to a stark conclusion: Harvard’s pattern of conduct suggests an institution that prioritizes preserving lucrative financial ties to China over enforcing its own standards, American interests, and upholding its institutional responsibilities.

The Committees make the following findings:

Finding 1: Harvard’s Compliance Program Prioritized Research Activities Over American National Security, Economic and Technological Superiority.

¹¹ *International Grant Administration*, Harvard Global, <https://www.harvardglobal.org/our-services/international-grant-administration> (last visited June 4, 2026).

Finding 2: The Chinese Government Invited a Harvard Professor to Design and Conduct a Health Executive Education Series that May Have Included an Entity Sanctioned by the Treasury Department for Furthering the Uyghur Genocide.

Finding 3: Harvard Possessed Information a Treasury Sanctioned Entity Planned to Attend Its Online Executive Education and Proceeded Without Taking Further Action.

Finding 4: Harvard Likely Funded Treasury Sanctioned Officials to Learn Skills That Could Help Them Further Commit Human Rights Abuses Against the Uyghur People.

Finding 5: When the Allegations of Harvard's Educating a Treasury Sanctioned Official Came to Light, Harvard's First Priority Was Maintaining a Good Relationship with the Chinese Government.

Finding 6: Harvard's Lead Research Official Initially Refused to Recognize and Condemn China's Ongoing Genocide Against the Uyghur People.

Finding 7: Harvard's Research Security Program Allowed Numerous Research Collaborations that Undermine U.S. National Security and Bolstered Chinese Military and Technological Capabilities.

Finding 8: Harvard Claimed to Lack the Infrastructure to Identify, Track, and Screen University Partnerships to Protect U.S. National Security.

Finding 9: Harvard Created a Third-Party Entity Staffed by Its Own Employees that Appears to be Designed to Circumvent Gift Reporting Requirements.

INTRODUCTION

The Committees initiated an investigation of Harvard University after learning about Harvard's ongoing activities that undermine U.S. national security. For years, the Select Committee highlighted how current gaps in U.S. law allow universities to partner on research with universities linked to the Chinese military.¹² Some of the issues highlighted in this report, such as training a Treasury sanctioned entity, appear unique to Harvard. However, many are not. U.S. universities including Harvard continue to engage in problematic research relationships with America's greatest adversary: China. Technical research conducted with entities tied to China's defense research and industrial base directly supports the development of military capabilities that will be used to identify, track, target, and engage U.S. and allied forces. If a school with Harvard's resources and academic horsepower chooses not to address this problem, then which academic institution will? Congress must pass the SIRA Act and the DETERRENT Act to ensure American academic talent and research do not collaborate with entities listed by the U.S. government as well as ensuring institutions are fully transparent about their foreign relationships.

BACKGROUND

Harvard University is a tier one research university in science and technology across dozens of disciplines. As of July 1, 2024, Harvard held more than 5,800 patents, 52 Harvard faculty received Nobel prizes while working at the University, and more than 5,000 ventures have been spun out of the Harvard Innovation Labs since its founding.¹³ Harvard's Medical School alone holds more than 10 Nobel prizes for work done while at Harvard Medical School.¹⁴ Among its technical achievements, Harvard hosted one of the earliest programmable computers,¹⁵ the first autonomous entirely soft robot,¹⁶ and the world's first logical quantum processor.¹⁷ **Harvard represents the pinnacle of American research and the key to maintaining our scientific edge against China.**

Harvard hosts several different schools. These schools focus on different areas, such as public health (the Harvard Chan School of Public Health), engineering (the

¹² E.g. H. Select Comm. on the Strategic Competition Between the U.S. & the Chinese Communist Party & H. Comm. on Educ. & the Workforce, CCP on the Quad: How American Taxpayers and Universities Fund the CCP's Advanced Military and Technological Research (Sept. 23, 2024), <https://chineselectcommittee.house.gov/media/reports/ccp-on-the-quad-how-american-taxpayers-and-universities-fund-the-ccp-s-advanced-military-and-technological-research>.

¹³ *Innovation*, Harvard Uni., <https://www.harvard.edu/in-focus/innovation/> (last visited February 3, 2026).

¹⁴ *Nobel Laureates*, Harvard Med. Sch., <https://hms.harvard.edu/about-hms/facts-figures/nobel-laureates> (last visited May 22, 2026).

¹⁵ Alvin Powell, *Mark 1 Rebooted*, Harvard John A. Paulson School of Engineering & App. Sciences (July 26, 2021), <https://seas.harvard.edu/news/mark-1-rebooted>.

¹⁶ Leah Burrows, *The First Autonomous, Entirely Soft Robot*, Wyss Inst. (Aug. 24, 2016), <https://wyss.harvard.edu/news/the-first-autonomous-entirely-soft-robot/>.

¹⁷ Anne J. Manning, *Researchers Create First Logical Quantum Processor*, Harvard Gaz. (Dec. 8, 2023), <https://news.harvard.edu/gazette/story/2023/12/researchers-create-first-logical-quantum-processor/>.

Harvard John A. Paulson School of Engineering and Applied Sciences), and medicine (the Harvard Medical School). These schools run some of their own compliance infrastructure and share certain functions with the main organization.

Harvard's financial resources make it a category of one in U.S. academia. According to its 2024 annual report, Harvard holds roughly \$82 billion of assets, generated operating revenue of more than \$6.5 billion, and spent more than \$2.8 billion on salaries and wages.¹⁸ For comparison, Harvard holds more assets than the financial assets held by the country of Argentina in 2023.¹⁹ Harvard had more operating revenue than the entire operating budget of its neighboring city of Boston.²⁰ Harvard's financial resources give it the heft of a medium-sized American city. However, these financial resources do not insulate Harvard from Chinese influence.

The Committees first investigated Harvard in October 2024 following an incident where a pro-CCP agitator physically assaulted an anti-CCP protestor when they protested a speech by Chinese Ambassador Xie Feng at the Harvard Kennedy School of Government.²¹ Rather than investigate the pro-CCP assailant, documents showed Harvard capitulated to China. Harvard placed the anti-CCP protestor on academic probation and took no action against the pro-CCP assailant.²²

This investigation focuses on a different area of Harvard: its research and education apparatus. Unfortunately, the investigation shows Harvard not only furthers China's political agenda but also its scientific agenda. While each incident represents a sad episode of deference to CCP interests, when viewed in totality a more troubling conclusion emerges. China used money to capture Harvard University as it has many other American universities.

The Committees rest this conclusion on the fact that at each turn Harvard took actions that benefited the PRC government at the expense of United States. This report lays out a series of instances where Harvard took actions undermining U.S. national security and benefiting China. For example, as described below, Harvard researchers conducted dual-use research with entities linked to the Chinese military, Harvard's head of research initially refused to affirmatively acknowledge China's Xinjiang genocide, and Harvard failed to discipline a pro-CCP assailant on campus.

¹⁸ Harvard Univ., Harvard University Financial Report – Fiscal Year 2025 (2025), <https://finance.harvard.edu/sites/g/files/omnuum12671/files/2025-10/fy25-financial-report.pdf>.

¹⁹ According to Allianz Research, Argentina held € 52 billion in financial assets in 2024. Allianz Research, Allianz Global Wealth Report 2024 (Sept. 24, 2024), https://www.allianz.com/content/dam/onemarketing/azcom/Allianz_com/economic-research/publications/allianz-global-wealth-report/2024/2024-09-24-Allianz-Global-Wealth-Report.pdf.

²⁰ FY24 Operating Budget, City of Boston (Oct. 30, 2025), <https://www.boston.gov/departments/budget/fy24-operating-budget>.

²¹ Moolenaar Unveils Harvard Failed to Stand Up to CCP Influence on Campus, House Sel. China (Oct. 18, 2024), <https://chinaselectcommittee.house.gov/media/press-releases/moolenaar-unveils-harvard-failed-stand-ccp-influence-campus-1>.

²² *Id.*

WEAPONIZING OPENNESS: CHINA'S INTENTIONS TO STRENGTHEN ITS MILITARY MODERNIZATION EFFORTS

Stepping off the plane in China, it appeared to be another conference trip for Dr. Charles Lieber. A renowned Harvard scientist with expertise in nanoscience,²³ Dr. Lieber must have felt like a star arriving in China. After years of U.S. government-funded research, Dr. Lieber became a world-renowned scientist with ambitions to win a Nobel Prize. However, there was nothing ordinary about this trip. Before arriving in China, Dr. Lieber received a “Contract for Strategic Scientist’s Appointment.”²⁴ After returning to America, Dr. Lieber worked with a professor in China to set up the Wuhan University of Technology (WUT)-Harvard Joint nano Key Laboratory.²⁵ Months later, in April 2012, the WUT professor sent an email to Dr. Lieber informing him he had been selected to participate in China’s Thousand Talents Program, a CCP-directed effort to recruit talent from overseas.²⁶ Shortly after, in July 2012, Dr. Lieber signed the Thousand Talents Agreement.²⁷ This was an intelligence coup for the CCP. When investigators later asked him why he joined the Thousand Talents Program, he said he “wanted to win a Nobel Prize.”²⁸

Dr. Lieber’s relationship with WUT traces back to 2008 through Dr. Lieber’s own lab at Harvard.²⁹ Between 2008 and 2011, Dr. Liqiang Mai was a postdoctoral fellow in the Lieber Research Group.³⁰ After leaving Harvard in 2011, Dr. Mai became a professor of materials at WUT. Once there, he recruited Dr. Lieber to become a “Strategic Scientist” at WUT, which ultimately led to Dr. Lieber joining the Thousand Talents Program. Later, federal investigators caught on to Dr. Lieber and launched a criminal investigation leading to felony charges. After charging him with a variety of federal crimes, a federal jury convicted Dr. Lieber of multiple felonies related to his participation in the Thousand Talents Program.³¹ At the time, the Thousand Talents Program rewarded scientists with money from Chinese universities and the Chinese Government of approximately \$158,000 in “personal benefits” and nearly \$800,000 in “research funding.”³² When Dr. Lieber signed a contract with WUT, WUT agreed to pay Dr. Lieber \$50,000 per month

²³*United States v. Lieber*, No. 20-cr-10111-RWZ, Doc. 1-1, Affidavit in Support of Application For Criminal Complaint ¶ 5 (D. Mass. Jan. 27, 2020).

²⁴ *Id.* ¶ 11.

²⁵ *Id.*

²⁶ *Id.*

²⁷ *Id.*

²⁸ *United States v. Lieber*, No. 20-cr-10111-RWZ, Doc. 308, Gov’t Sentencing Memorandum at 1 (D. Mass. Apr. 23, 2023).

²⁹ *Id.* at 2.

³⁰ *Id.*

³¹ *Former Harvard University Professor Sentenced for Lying About His Affiliation with Wuhan University of Technology; China’s Thousand Talents Program; and Filing False Tax Returns*, Dep’t of Justice (Apr. 26, 2023), <https://www.justice.gov/usao-ma/pr/former-harvard-university-professor-sentenced-lying-about-his-affiliation-wuhan>.

³² *United States v. Lieber*, No. 20-cr-10111-RWZ, Doc. 1-1, Affidavit in Support of Application For Criminal Complaint ¶ 15 (D. Mass. Jan. 27, 2020).

and living expenses of up to approximately \$158,000.³³ Ultimately, he was sentenced to two days in jail, six months of house arrest, and tens of thousands of dollars in fines.³⁴ The fines imposed did not even cover the amount the Chinese government agreed to pay him.³⁵

Later, Dr. Lieber returned to China, not Harvard. In April 2025, Dr. Lieber joined the Tsinghua Shenzhen International Graduate School as a Chair Professor of Tsinghua, the University's highest honor.³⁶ Below is a photo taken from the welcome ceremony when he joined Tsinghua University.



Figure 4 – Tsinghua Vice President Wang Hongwei (right) presenting the appointment certificate to convicted felon Charles M. Lieber, formerly of Harvard University (left).

Recent reporting shows Dr. Lieber not only rebuilt his lab in China but also began contributing to China's brain-computer interface research.³⁷ Brain-computer interface technology can be used to treat conditions such as restoring movement in paralyzed patients.³⁸ However, it also holds military applications. According to the Pentagon, People's Liberation Army (PLA) scientists have investigated brain interfaces as a way to engineer super soldiers by boosting mental agility and situational awareness.³⁹ News reports state that Dr. Lieber now oversees China's state-funded i-BRAIN, or Institute for Brain Research, Advanced

³³ *Id.* ¶ 18.

³⁴ *Former Harvard University Professor Sentenced for Lying About His Affiliation with Wuhan University of Technology; China's Thousand Talents Program; and Filing False Tax Returns*, Dep't of Justice (Apr. 26, 2023), <https://www.justice.gov/usao-ma/pr/former-harvard-university-professor-sentenced-lying-about-his-affiliation-wuhan>.

³⁵ *See id.*

³⁶ *Charles M. Lieber Joins Tsinghua Shenzhen International Graduate School (SIGS)*, Tsinghua Uni. (May 1, 2025), <https://www.sigs.tsinghua.edu.cn/en/2025/0501/c7386a103010/page.htm>.

³⁷ David Kirton, *Convicted Former Harvard Scientist Rebuilds Brain Computer Lab in China*, Reuters (May 1, 2026), <https://www.reuters.com/world/china/convicted-former-harvard-scientist-rebuilds-brain-computer-lab-china-2026-04-30/>.

³⁸ *Id.*

³⁹ *Id.*

Interfaces and Neurotechnologies.⁴⁰ Dr. Lieber's new perch gives him access to a million-dollar lithography machine and rhesus monkeys to experiment on brain-computer interfaces.⁴¹

In sum, Dr. Lieber served a two-day term of imprisonment followed by house arrest, then joined a Chinese university and received its highest honor. All of this occurred after he received substantial payments from China and lied about it to federal law enforcement. Afterward, Dr. Lieber returned to China to work on brain-computer interfaces that will likely further China's military modernization efforts. Other professors may conclude that they can take Chinese money with almost no meaningful consequences. Unfortunately, Chinese money has flooded America's academic community to recruit the United States' top scientists in pursuit of CCP goals.

Over the years, China established a vast and highly coordinated technology and know-how acquisition apparatus backed by industrial policies, state-directed talent recruitment programs, Five-Year Plans, medium- and long-term science and technology development strategies, laws, and formal government statutory records. Official PRC policy documents explicitly identify foreign technology acquisition, overseas talent recruitment, and absorbing international research as core mechanisms for advancing China's strategic, technology, and military objectives. These directives are operationalized through state-run talent programs, research partnerships, professional appointments, defense-linked laboratories, and provincial and municipal innovation platforms. These platforms in turn systematically target Western universities, national laboratories, and researchers for access to expertise, intellectual property, data, and training. This plan implements a sustained state strategy to target foreign-funded research—particularly from the United States—to accelerate China's technological and military prowess.

China deliberately structured its research ecosystem to advance state objectives. China's academic and scientific institutions operate under and are dictated by a system of centralized national planning. In contrast, the United States maintains a decentralized research ecosystem driven by universities, private industry, and multiple federal agencies. This system is guided by competition, peer review, and market demand rather than political directive. The implication of this fundamental difference is clear: Chinese research is coordinated to advance state power, while U.S. research evolves organically through open inquiry and scientific freedom.

When China engages with the global scientific community, it does so on its own terms. While China benefits from access to open research systems abroad, it restricts comparable access at home. Academic and scientific activity is tightly controlled by the CCP. China restricts foreign access to its largest academic

⁴⁰ *Id.*

⁴¹ *Id.*

publication database, the China National Knowledge Infrastructure (CNKI).⁴² Most critically, the PRC explicitly weaponizes access to foreign innovation to advance its strategic economic, technology, and military objectives. Over the years, the Chinese government implemented multiple statutory policies and administrative directives explicitly designed to target and acquire foreign intellectual capital, advanced technology, and scientific know-how:

- According to an official Chinese government directive jointly issued by the Ministry of Personnel, Ministry of Education, Ministry of Science and Technology, Ministry of Finance, and the Ministry of Public Security titled “Circular on the Release of Opinions on Encouraging Overseas Chinese Scholars to Serve the Country by Multiple Means” the Chinese government explicitly outlines a framework to mobilize overseas Chinese students, including those who remain abroad, to advance the strategic interests of the state. The document encourages overseas students to hold part-time technical, consulting, or honorary roles in Chinese universities, state key laboratories, research institutes, and enterprises; enter into cooperative research agreements with Chinese institutions that can be executed remotely or through short-term visits; and establish “cooperative development bases” in China or abroad to facilitate technology transfer. It further directs students to use foreign laboratory access, equipment, and funding to support domestic technology development; accept and conduct commissioned research projects for Chinese entities while abroad; and file patents in China for discoveries made at foreign institutions.^{43,44}
- The “Plan to Build a National Technology Transfer System” outlines a comprehensive guide to China’s technology transfer system with, the acquisition of “high-level overseas talent” emphasized.^{45,46}

⁴² News Article, Lin Yang, Voice of America, China to Limit Access to Largest Academic Database, March 30, 2023, <https://www.voanews.com/a/china-to-limit-access-to-largest-academic-database-/7029581.html>.

⁴³ Public Announcement, Ministry of Public Security, Ministry of Finance, Ministry of Science and Technology, Ministry of Education, Ministry of Personnel, Ministry of Education, Ministry of Science and Technology, Ministry of Public Security, Ministry of Finance Regarding the issuance of the “On Encouraging Overseas Students to Diversify Several Opinions on Serving the Country” 人事部教育部科技部公安部财政部关于印发《关于鼓励海外留学人员以多种形式为国服务的若干意见》的通知 2001, https://www.gov.cn/gongbao/content/2002/content_61391.htm.

⁴⁴ Public Notice, Ministry of Education of the People’s Republic of China, The Ministry of Personnel, the Ministry of Education, the Ministry of Science and Technology, the Ministry of Public Security, and the Ministry of Finance issued the “Several Opinions on Encouraging Overseas Students to Serve the Country in Various Forms” 人事部、教育部、科技部、公安部、财政部关于印发《关于鼓励海外留学人员以多种形式为国服务的若干意见》的通知, 2001, http://www.moe.gov.cn/jyb_xxgk/gk_gbgg/moe_0/moe_7/moe_16/tnull_167.html.

⁴⁵ *Id.*

⁴⁶ News Report, Xinhua News Agency, The State Council issued the “National Technology Transfer System Construction Plan” 建立国家技术转移体系的计划, September 26, 2017, https://www.gov.cn/xinwen/2017-09/26/content_5227705.htm

The PRC government's publicly available statutory records and administrative directives leave no ambiguity about the PRC's intent: they seek to systematically acquire foreign technology, intellectual property, and scientific know-how through academic and research collaboration. Anchored by national security mandates such as the 2017 National Intelligence Law, this architecture is not limited to hardware acquisition but is explicitly designed to absorb and divert human and intellectual capital into China's broader strategic apparatus and innovation system. Many engagements with the PRC appear as benign academic engagement. In reality, this collaboration furthers a pre-meditated effort to exploit the openness of democratic research systems. U.S. researchers and institutions do not recognize the downstream risks and therefore fuel the PRC's goals of technological self-sufficiency, economic dominance, and military modernization.

As this investigation demonstrates, the Chinese government's influence has penetrated Harvard's research ecosystem to a degree that raises serious concerns about the university's independence and judgment. The extent and depth of these relationships reflect more than isolated lapses. They reveal a systemic vulnerability to exploitation by entities operating within China's state-directed and Military-Civil Fusion apparatus.

Harvard, similar to other U.S. universities, espouses core academic values such as integrity, honesty, and accountability. Yet, when those principles are tested in the context of engagement with China and other authoritarian regimes, the university repeatedly failed to uphold them. Instead, the record shows a pattern of selective blindness, where clear risks are minimized, ignored, or rationalized in pursuit of continued collaboration, funding, and institutional prestige.

The Committees' findings further demonstrate an institution that has not only failed to implement adequate safeguards, but with regard to Chinese entities, has also resisted transparency in this investigation. Initially, Harvard quickly responded to the Committees' document requests after receiving the Committees' initial letter. However, when the Committees requested a list of universities in China Harvard collaborates with, Harvard claimed reasonable requests were burdensome, provided piecemeal disclosures, and repeatedly claimed there was a burden to producing records that an institution of its size and sophistication should readily maintain. This conduct does not reflect administrative oversight or resource constraints. It shows Harvard was either unwilling or unable to provide transparency on its relationships with entities that undermine U.S. national security.

KEY FINDINGS

This report's findings are based on the Committees' investigation of Harvard's activities. As part of its investigation, the Committees received thousands of pages of documents from Harvard, reviewed Chinese government documents, conducted transcribed interviews with Harvard personnel, and heard testimony

from other witnesses. This investigation showed a systematic, entity-wide failure that prioritizes CCP interests over American national security. Throughout the process, Harvard was mostly cooperative. Harvard made thousands of pages of documents available to the Committees beginning shortly after receiving the Committees' first letter in May 2025. However, when the topic turned to producing a list of the Chinese universities Harvard works with, Harvard's representatives frustrated the investigation, as described later in this report.

The Committees identified the following key findings related to Harvard's systematic failure to protect American national security.

Finding 1: Harvard's Compliance Program Prioritized Research Activities Over American National Security, Economic and Technological Superiority.

Based on the review of Harvard's research compliance program, the Committees found that Harvard prioritized research activities over American national security. The Committees make this finding based on their review of three areas. First, Harvard's policies and procedures allowed research collaboration with known foreign adversary entities. Second, Harvard failed to equip the professor who potentially trained a Treasury sanctioned entity with the training and support she needed. Third, although Harvard asserted its program went well beyond legal compliance, Harvard could not articulate a clear set of standards, requirements, or criteria for what the policies required beyond legal compliance.

A. Harvard's Policies and Procedures Did Not Meaningfully Prevent Chinese Influence from Seeping Throughout the Organization

The Committees received hundreds of pages about Harvard's university-wide compliance program. These documents revealed a robust program on paper that focused on legal compliance but overall failed to meaningfully address the risks associated with conducting research with PRC-based entities. Three examples highlight the problems with Harvard's compliance program.

First, Harvard created a "Frequently Asked Questions" document for researchers, and it includes the question "I would like to collaborate with former group members that now have appointments at research institutions in China. Is this allowed?" to which the answer begins "There is nothing to prevent you from collaborating with former group members that are now professors in China."⁴⁷ The answer goes on to discuss legal restrictions related to U.S. export controls and a series of Harvard procedures designed to effectuate compliance. This question highlights two things. (1) It shows the pervasive nature of collaboration with China at Harvard. For this question to be added to the "Frequently Asked Questions" list, professors throughout the university must have raised the issue repeatedly; and (2) it highlights Harvard's focus on legal compliance rather than American national security. The answer does not mention that many Chinese universities maintain ties to the Chinese military such as the "Seven Sons of

⁴⁷ HRVD-HSC-000000958 at 4.

National Defense” [国防七子], which are a group of universities that are former PLA technical academies holding top secret security credentials focused on furthering China’s military modernization.⁴⁸ While the U.S. government placed export control restrictions on some of these entities, some do not have restrictions. Moreover, the export control regime contains a fundamental research exemption that applies to many of these collaborations, thereby limiting the applicability of traditional export control restrictions.

Second, Harvard’s compliance documents facilitated speedy resolution rather than meaningful review. One guidance document from the Harvard Medical School on screening specifically directed the user to do an exact match with an entity name when determining if a foreign counterparty was a sanctioned entity.⁴⁹ This would mean that if the name were slightly off, a user would incorrectly identify them as not being sanctioned.⁵⁰ The U.S. government has long identified the substantial risk of using exact matches. In 2018, the U.S. Department of Treasury’s Office of Foreign Assets Control (OFAC) fined a financial institution when its screening software failed to identify customer names with hyphens, initials, or additional middle or last names as potential matches to similar or identical names on the Specially Designated Nationals List.⁵¹ Running exact matches brings this exact risk to Harvard’s activities and highlights one of its programmatic failures.

In another example, Harvard did not have a policy requiring disclosure of Foreign Talent Recruitment Programs and prohibiting participation in Malign Foreign Talent Recruitment Programs until May 2024.⁵² However, this policy came well after the issue was recognized, and Harvard failed to act until legally required.⁵³ Harvard had multiple warnings that Foreign Talent Recruitment programs posed a threat to the university. On October 10, 2019, the Department of

⁴⁸ The answer also notes that ‘certain individuals and entities, including some Universities and research institutions in China, are included on US restricted parties lists,’ but it does not specifically mention, detail, or highlight the “Seven Sons” universities.

⁴⁹ HRVD-HSC-000000988.

⁵⁰ The same procedure recommends using the “Fuzzy Level 2” feature when given a name verbally and the user is unsure how to spell it, such as those names that do not utilize the Latin alphabet. HRVD-HSC-000000988.

⁵¹ *Enforcement Information for October 5, 2018*, Off. For. Assets Control (Oct. 5, 2018), <https://ofac.treasury.gov/media/11276/download?inline>.

⁵² HRVD-HSC-000000042 at 2.

⁵³ After the Committee provided this draft section of the report to Harvard for review pursuant to Committee practice, Harvard highlighted that it issued a memo in 2019. However, the memo Harvard cited and linked below illustrates that Harvard recognized the threat of foreign talent recruitment programs but failed to take meaningful action. The letter fails to describe China and other countries’ efforts to engage in talent recruitment programs, instead stating “[the notices] reflect the agencies’ increased scrutiny over the allocation of government funds and impacts of foreign influence on federally sponsored research, as was initially communicated to faculty back in April.” Moreover, the memo fails to include meaningful consequences, instead stating that “[f]ailure to comply with the requirements could jeopardize obtaining federal funding.” Finally, it failed to have the intended effect as shown by the December 2021 federal conviction of Dr. Charles Lieber. Provost Faculty Disclosure Letter August 2019, Harvard University (Aug. 21, 2019), <https://ari.hms.harvard.edu/sites/g/files/mcu761/files/assets/Provost%20Faculty%20Disclosure%20Letter%20August%202019.pdf>.

Defense sent a letter to the academic community concerning the risk of foreign influence in academia.⁵⁴ In November 2019, the Senate Permanent Select Committee on Investigations issued a report on China's talent recruitment programs.⁵⁵ In December 2021, Dr. Charles Lieber, described above, was convicted by a federal jury of six felonies related to his participation in a Chinese foreign talent recruitment program.⁵⁶ Yet, Harvard failed to act for five years after the problems were made public, and for almost three years after a federal jury convicted one of its faculty members for participation in a Chinese talent recruitment program. In training slides accompanying the policy, Harvard specifically identified the policy as covering the *legal* requirements passed as part of the CHIPS and Science Act of 2022.⁵⁷ These slides, however, make no mention of American national security.⁵⁸ More importantly, Harvard's approach reflects a narrow focus on legal compliance, aimed primarily at avoiding liability rather than mitigating risk. Harvard demonstrated little interest in taking additional steps to safeguard the U.S. research and innovation ecosystem from exploitation by authoritarian regimes such as China, which actively leverage academic openness to acquire human capital and intellectual assets that advance the PRC's economic, technological, and military objectives.

Third, Harvard's definition of conflict of commitments⁵⁹ is overly narrow because it confines the concept almost exclusively to "outside activities"⁶⁰ that interfere with institutional responsibilities.⁶¹ This framing fails to capture the full range of competing obligations that can compromise federally funded research, particularly undisclosed foreign appointments, foreign gifts and contracts, and other binding commitments that influence research direction, intellectual property,

⁵⁴ U.S. DEP'T OF DEFENSE, COUNTERING UNWANTED FOREIGN INFLUENCE IN DEPARTMENT-FUNDED RESEARCH AT INSTITUTIONS OF HIGHER EDUCATION (June 29, 2023), available at <https://media.defense.gov/2023/Jun/29/2003251160/-1/-1/1/COUNTERING-UNWANTED-INFLUENCE-IN-DEPARTMENT-FUNDED-RESEARCH-AT-INSTITUTIONS-OF-HIGHER-EDUCATION.PDF>.

⁵⁵ SEN. PERM. SUBCOM. INVESTS., THREATS TO THE U.S. RESEARCH ENTERPRISE: CHINA'S TALENT RECRUITMENT PLANS (Nov. 18, 2019), <https://www.hsgac.senate.gov/wp-content/uploads/imo/media/doc/2019-11-18%20PSI%20Staff%20Report%20-%20China's%20Talent%20Recruitment%20Plans%20Updated2.pdf>.

⁵⁶ *Former Harvard University Professor Sentenced for Lying About His Affiliation with Wuhan University of Technology, China's Thousand Talents Program; and Filing False Tax Returns*, Dept' of Justice (Apr. 26, 2023), <https://www.justice.gov/usao-ma/pr/former-harvard-university-professor-sentenced-lying-about-his-affiliation-wuhan>.

⁵⁷ HRVD-HSC-000000042 at 2-3.

⁵⁸ The slides discuss the indicators of Malign Foreign Talent Recruitment Programs, a significant national security concern, and outline steps for individuals to take to combat the risk.

⁵⁹ A conflict of commitment exists when a person's time, effort, or obligations to an institution are compromised by competing commitments, regardless of whether those commitments are internal or "outside activities," compensated or uncompensated. Such conflicts arise whenever professional obligations interfere with, compete with, or materially undermine an individual's ability to fulfill responsibilities to their employing institution or to the U.S. Government, including obligations related to research integrity, funding compliance, intellectual property, and national security.

⁶⁰ Harvard represented to the Committees that it also requires "additional disclosures – including a biographical sketch and malign foreign talent recruitment program attestations – which attempt to capture a faculty member's potentially competing obligations." Harvard University, Harvard Report Feedback Spreadsheet F8 (June 10, 2026).

⁶¹ HRVD-HSC-000000608 at 31.

publication decisions, or personnel without necessarily exceeding formal time and effort limits or being labeled as outside work. By focusing on activity classification rather than obligation, effort, and priority, Harvard's approach understates risks that federal research-funding agencies evaluate as material conflicts.

While there was significant training documentation, this training material failed to have an impact that mattered. As discussed in the Committees' letter, Harvard held an executive training in China that may have trained a Treasury sanctioned entity. The evidence is unclear. The Committees interviewed the professor, Dr. Winnie Yip, who organized this executive education. Dr. Yip stated that Harvard did not train her on research security, data security, or sanctions compliance, and that she was never informed of any requirement or process for vetting attendees at her executive trainings.⁶² This testimony showed that despite Harvard's assertions that it had robust research security training, at least one professor does not recall receiving that training.

To give Harvard the opportunity to respond, the Committees held a transcribed interview with Harvard's head of research. Initially, the research head's responsibilities include working with researchers to understand the nature of relevant items and technologies. This activity implicates U.S. export controls. However, Harvard's head of research apparently lacked an understanding of export controls. When the Committees asked him about export control laws, it led to the following exchanges:

Q Okay. So when I say the Export Administration Regulations, do you know what that is?

A Yes.

Q What is that?

A Could you clarify the question, please. I will try to give you a candid answer.

Q What is the Export Administration Regulations?

A I don't know in the name that you're referring to. I know about export control laws that apply to fundamental research --

Q Okay.

After initially claiming to know export control laws, head of research could not explain the most basic set of regulations governing export of dual-use technologies. In another exchange, he stated as follows:

Q Does fundamental research qualify as being controlled under these export control regulations?

A Export control regulations can apply to fundamental research. They can apply to other nonresearch-related activities. They're around specific entities and technologies that could be developed in the context, for example, of fundamental research. So, yes, they do apply, and as a result, our fundamental research activities go through a screening to

⁶² Documents on File with the Committee.

determine whether they're allowable, and the international activities or the transfer of information is allowable.

Q So you're saying that the export controls do apply to fundamental research. So if I were to look in the regulation, I would not find an exception from fundamental research.

A My understanding -- and certainly it is the practice of my office -- is that export control do, of course, apply to fundamental research. That's why we have a process to review all of our fundamental research to ensure that it basically is consistent with export control laws.

Q. Okay. So would it be fair to say that if I were to look at the research that you have approved, and I could find -- and I found something that had both civil and military applications, it should be -- having been reviewed and approved by your office?

A Every research activity that we would conduct that would involve a contract or an agreement, certainly all sources of Federal funding, but other sources of funding as well, would be reviewed and approved.

Both topics are foundational concepts to the regulations that govern Harvard University. Both answers appear to show a failure to understand the rules he is charged with enforcing. The Export Administration Regulations govern the export and re-export of certain commodities, software, and technology.⁶³ They are foundational to protecting American national security from exports of technology that undermine U.S. national security or foreign policy. Moreover, "fundamental research," which is core to Harvard's activities, holds a specific definition and fundamental research (as defined) is excepted from export control regulations.⁶⁴ We see additional problems in another exchange between Harvard's head of research and the Committees about one of their collaborations with a Chinese military entity on deep-sea sensing technology.

Q So now this was a collaboration on soft robotics for deep-sea exploration. Did you look at that?

A We have assessed -- we assessed this project and disclosed the activities basically to this review process. We have, since receiving your letter, reviewed this activity, and we feel confident that it was allowable and that it was properly disclosed.

Q In a simple yes-or-no answer, do you think that working with a Chinese military university on soft robotics for deep-sea exploration undermines U.S. national security?

A I would not characterize it this way. I don't feel that we were working directly with the military entity within China. I think this was an international project that involved sensors that were used for deep-sea observation that had nonmilitary applications.

Q I just need a simple yes or no. Do you think it undermines U.S. national security?

⁶³ U.S. Export Regulations, Int'l Trade Admin., <https://www.trade.gov/us-export-regulations-0> (last visited February 4, 2026).

⁶⁴ See e.g. 15 C.F.R. § 734.8 (2025), 22 C.F.R. §§ 120.33, 120.34(a)(8).

A I don't agree with your characterization of the project, so I can't provide a yes or no answer.

Q So you think this was simple ... deep-sea exploration with no military applications at all?

A The activity involved was not a military application.

....

Q Simply because it wasn't a military robot? What would make it a military application then?

A Well, I think we generally understand what military applications are. This was a nonmilitary-related activity. It was -- and my understanding is that these were sensors and devices that were being used for nonmilitary application.

Q What would make it a military application?

A If it was a weapons system or something that was being used by the Chinese military.

Q So if anything that is not a weapons system used by the Chinese military is not a military application?

A No, I didn't say that. I said, I provided criteria that would establish that it was actually a direct, you know, military application.

Q Okay.

A I didn't say that that's inclusive of all things that could be used in that way.

Q But could you give me sort of your criteria for what would be if this is not?

A So, again, we looked to the Office of Science and Technology policy, we looked to the Department of Defense which issues regular information and bulletins around areas of our sensitive research. And that is an ever-evolving list. This is something that we scrutinize carefully, and we make an assessment to determine whether any activity would be in an area or of a nature that would raise these concerns.

Q So let's say the Department of Defense lists robotics as an area that it is interested in, would that mean that you should not do this project?

A Using the example of robotics, we do not disallow all robotics relative research activities at the university because many of those activities, of course, are nonmilitary applications. And again, given the nature of fundamental research, this is not classified research. We do no classified research at the university. This is research that we intent to essentially publish and distribute freely. So we engage in international activities when they're allowable because they actually benefit the activity, the research that we're involved in by providing additional expertise or data or information that helps improve the quality of that research.

This exchange shows the blinders Harvard put on about collaboration with China. The university appears to define "military applications" very narrowly and includes unclear criteria. These definitions enable researchers to more easily

engage with Chinese universities. Unfortunately, it also allows China to engage Harvard and develop technologies that can easily be applied to Beijing's military. For example, the specific research being discussed is titled *Bioinspired Soft Robots for Deep-Sea Exploration*.⁶⁵ It was conducted between a Harvard author and a co-author from Beihang University.⁶⁶ Beihang University is one of the PRC's "Seven Sons of National Defense," ("Seven Sons") which are a group of leading Chinese universities at the forefront of defense research in China,⁶⁷ and report to an agency with military jurisdiction.⁶⁸ Beihang University itself reported that as of 2017, it spent roughly 60% of its research budget on defense research.⁶⁹ In short, Beihang University's primary purpose is to support the Chinese military.⁷⁰ Additionally, Beihang University (under one of its other names, Beijing University of Aeronautics and Astronautics) has been listed on the Department of Commerce's Bureau of Industry and Security (BIS) Entity List since 2001.⁷¹

The research at issue included photos showing the dual-use nature of the technology even though Harvard's head of research referred it as "non-military." Below is a photo taken from the research paper itself.

⁶⁵ Guorui Li et al., *Bioinspired Soft Robots for Deep-Sea Exploration*, 14 NATURE COMM. 7097 (2023), <https://doi.org/10.1038/s41467-023-42882-3>.

⁶⁶ *Id.*

⁶⁷ Alex Joske et al., *China Defence Universities Tracker: Exploring the Military and Security Links of China's Universities*, AUSTRALIAN STRATEGIC POLICY INSTITUTE (Nov. 25, 2019) (report accompanying *China Defence Universities Tracker*), <https://www.aspi.org.au/report/china-defence-universities-tracker>.

⁶⁸ Unlike other traditional civilian universities that report to the Chinese Ministry of Education, the Seven Sons report to the Chinese Ministry of Industry and Information Technology (MIIT).⁶⁸ The MIIT holds ties to both the civilian and defense sectors of the Chinese economy, and the MIIT division called the State Administration of Science, Technology, and Industry for National Defense (SASTIND) has substantial involvement with the Seven Sons.⁶⁸ In 2016, a SASTIND publication referred to them as "military engineering universities."⁶⁸

⁶⁹ Beihang Univ., *Beihang University First-Class University Construction Plan (Concise Edition)* (Dec. 29, 2017) (archived Oct. 10, 2019), <https://web.archive.org/web/20191010002845/http://xxgk.buaa.edu.cn/info/1041/1112.htm>

⁷⁰ *Entity List: Revisions and Additions*, 66 Fed. Reg. 24264 (May 14, 2001).

⁷¹ Announcement, Federal Register/National Archives, Entity List: Revisions and Additions, May 14, 2001, <https://www.federalregister.gov/documents/2001/05/14/01-12188/entity-list-revisions-and-additions>

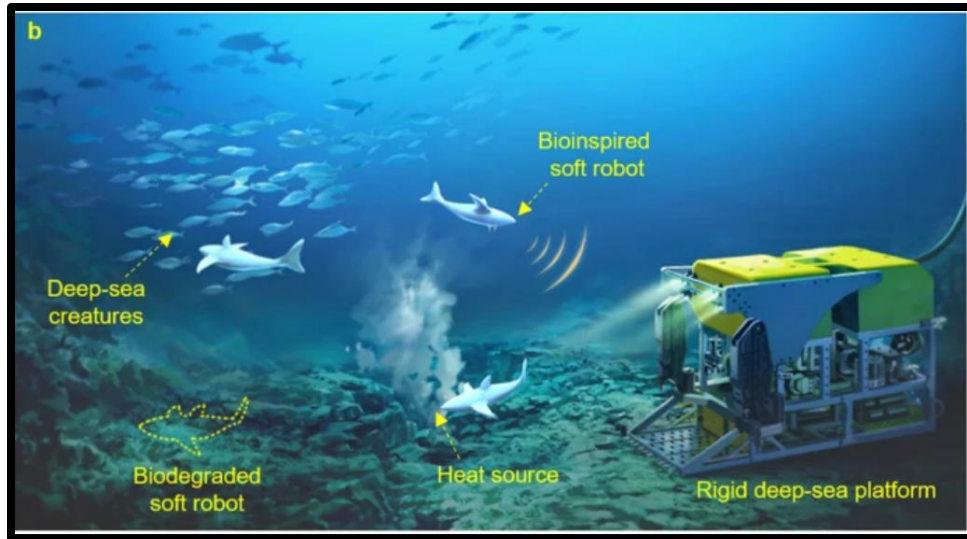


Figure 5 – Photo Showing the Intended Deep-Sea Capabilities of Harvard’s Co-Authored Research with Beihang University.

It is not difficult to imagine that rather than looking at the ocean floor, these robots were searching for American or allied submarines. The paper also included an entire section on sensing capabilities, highlighting the ability of these robots to identify and detect submarines (see the following image).

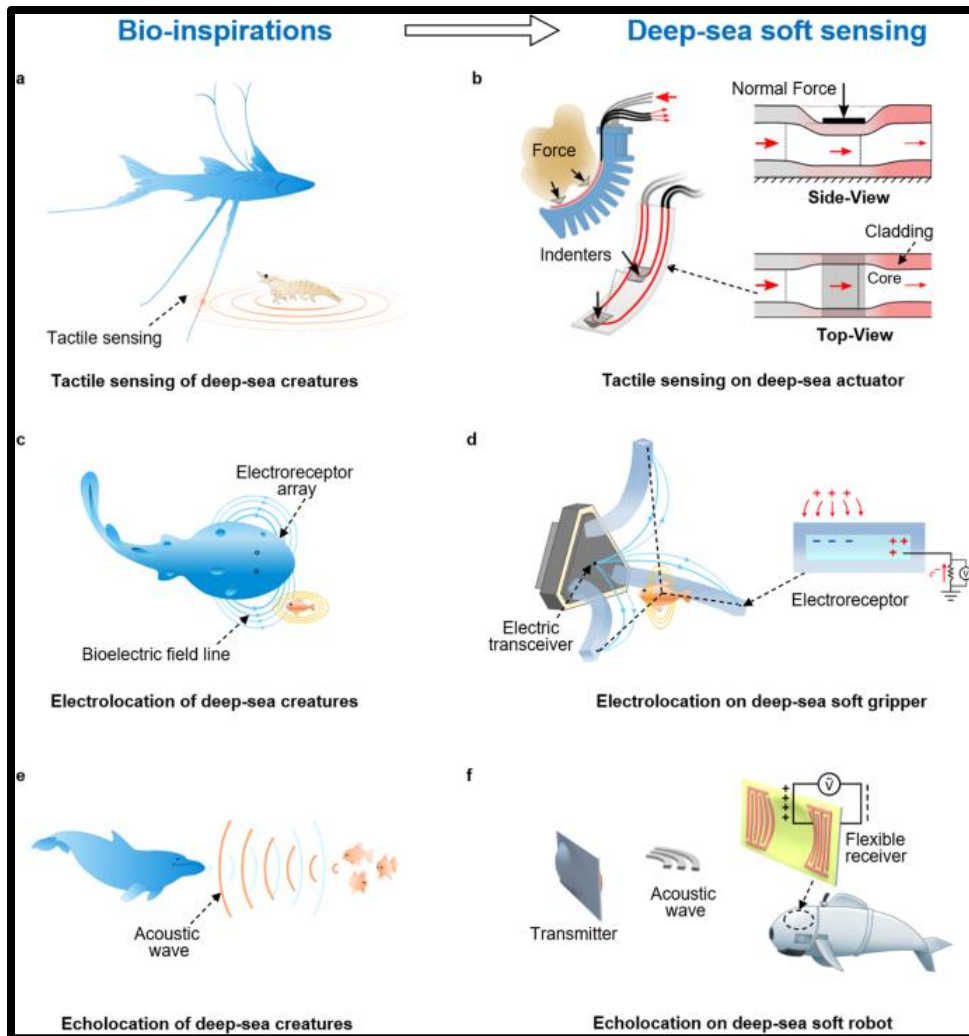


Figure 6 – Photo Showing the Intended Sensing Capabilities of Harvard’s Co-Author Research with Beihang University.

This is clear dual-use technology. By dual-use technology, this report refers to a technology, good, or software primarily developed for commercial applications that also can be utilized for military, defense, or weapons-of-mass destruction purposes. For example, here, these robots could be used for deep sea ocean discovery, but that same technology can be used to hunt for American and allied submarines. Despite the clear dual-use capabilities, Harvard’s lead research official refused to acknowledge the research’s military potential.

More importantly, Harvard’s response reflects a fundamental misunderstanding of the risk itself. Whether Harvard subjectively believes a given project has military applications is not the relevant standard. The critical question is how the collaborating institution, particularly one embedded within China’s defense research ecosystem, intends to use that research. Universities such as Beihang do not operate in a vacuum. They exist to support China’s Military-Civil Fusion Strategy, where the distinction between civilian and military research is deliberately blurred. In that system, research conducted under the guise of

civilian or academic inquiry can and will be leveraged for military purposes. By adopting a vague definition of “military application,” Harvard creates a permissive environment in which dual-use technologies can be developed and transferred to institutions whose primary mission is to advance PLA capabilities.

The compliance failures across the organization, combined with the general lack of substantive knowledge and the unwillingness to acknowledge the dual-use nature of its technology, call into question the effectiveness of the office. The Committees do not blame Harvard’s research head but Harvard the institution. To lead the research security office, Harvard selected a geologist. Harvard’s Head of Research agreed to the description of his background as follows:

Q I’m glad you brought up your background in Earth sciences. I saw your quote, “a structural geologist that studies the Earth’s crust with applications to earthquake science.”

A Yes.

The fact Harvard chose a geologist to lead the office responsible for working with researchers to understand the nature of relevant items and technologies illustrates their intent. Harvard did not design the office to be effective. In short, they set him up to fail. As a result, Harvard conducted research with Chinese military-linked entities such as Beihang University on technology with clear dual-use capabilities. Beihang University was not the only Chinese military university that Harvard researchers collaborated with.

B. When At Least One Professor Needed It, Harvard’s Compliance Program Failed Her

With the United States’ complex relationship with China, entities operating there must be extra careful to comply with the complex American restrictions and rules. Unfortunately, Harvard University failed to do so. The Committees thoroughly reviewed one project where Harvard University Professor Dr. Winnie Yip conducted an executive training where some of the attendees may have been members of the Xinjiang Production and Construction Corps (XPCC), an entity targeted by U.S. sanctions.

As discussed in more detail below, the Chinese government invited Dr. Yip to design and hold an executive training series to teach the National Healthcare Security Administration (NHSA) about introducing universal public health insurance. As part of this executive education, NHSA invited different parts of the Chinese government including the Treasury sanctioned paramilitary group called the XPCC. The Committees interviewed Dr. Yip to understand how a Treasury sanctioned entity attended an executive education in 2024 paid for by Harvard.

Dr. Yip could not confirm whether the Treasury sanctioned entity attended the event. Press releases from the Chinese government and Harvard mention the Treasury sanctioned entity attending. However, according to Dr. Yip, they believe

there was insufficient documentation to definitively determine whether the Treasury sanctioned entity actually attended the seminar.

According to Dr. Yip, Harvard did not train her on research security or sanctions compliance. When asked about Xinjiang, Dr. Yip stated she had only a general awareness of concerns about forced labor from news reports but could not recall the specific timeframe. This knowledge may have enabled her to identify high risk entities attending her executive education.

When asked about these compliance failures, the Committees and Harvard's head of research engaged in the following exchange:

Q What will those -- the nonresearch activities -- what kinds of activities are you examining in that area?

A They could be things like executive education that's provided internationally. We already have a program, for example, for online learning that involves international participants to do screening and vetting.

We've always had the requirement, of course, that this be done for outside the country, executive education opportunities, but we're basically providing greater support for that process through the schools. And then, again, ensuring that in areas of sensitive research or with countries of concern, this becomes elevated to my office for review.

I'd also say that if there's a sponsorship or cosponsorship of a conference or an activity where Harvard is represented, of course we would bear responsibility for reviewing that, determining that the partners that we're engaged with are proper, and vetting the participants of those programs.

Q Was there a program in place prior to the recent changes to look at conferences, executive education, or other nonresearch activities of that nature?

A Yes, there has been. So available on websites from my offices and websites in the various schools, there's a definition basically of the processes that are required for reviewing and vetting international activities.

He also noted that Harvard is implementing changes to its review process where the Central Administration will be playing a more important role in reviewing these research activities from a compliance perspective.

Harvard's head of research claimed there was a program in place, but Dr. Yip told a different story. According to Dr. Yip she received no training on operating in China and Harvard failed to impart on her the importance of understanding who participated in Harvard events. Dr. Yip testified that she reported the executive trainings each year to the University's Office of Outside Activity and Interest Reporting (OAIR), and only first received outreach from the School of Public Health's export control office in April 2025 requesting information about her travel to China. She further testified that she completed all compliance trainings that Harvard made her aware of (such as Title IX and sexual harassment

trainings), and was never informed of any additional requirements specific to her international work in China.

The Committees find Dr. Yip's testimony more credible based on other information. Specifically, when the Committees interviewed a compliance official for the Harvard Chan School, that official would not categorically deny collaborating with foreign adversaries such as with the PLA and Iran.⁷² However, the official insisted that Harvard follows the law, conducts thorough reviews, and requires licenses where needed. This information combined with the systematic problems associated with Harvard's compliance program laid out above and Harvard's head of research failing to understand the basic regulations he oversees corroborates Dr. Yip's testimony. Together, it paints a picture of a paper compliance program devoid of substance.

C. Harvard Claimed Its Policies and Procedures Went Above Legal Requirements, But Could Not Articulate the Standards Used

When Committee staff questioned Harvard's top research official, he repeatedly stated that Harvard's policies and procedures went above legal requirements. However, when pressed on how that analysis proceeded, the Committees could not understand the answer given by Harvard's Head of Research as shown in the following exchange:

Q Let's imagine you are approached with a proposed research collaboration that involves one of China's Seven Sons of National Defense.

Can you help us understand what kinds of collaborations with the Seven Sons of National Defense entity you would be inclined to allow and what kinds of collaborations with the Seven Sons of National Defense university you would deem not advisable?

Please in your answer don't discuss questions related to the legality. I'd like to set those aside.

A Well, I appreciate your statement that Harvard complies with Federal law. That certainly is our intent in every case. To answer your specific question about the process, again, I come back to the staging that we look at restricted parties list, right. We then look at the nature of the research activity to make a determination and an assessment. If we had an entity, of course, that was affiliated with defense interest in China, and it was a sensitive area of research; the default, of course, would be not to proceed in that activity. That would be the policy our university. That would be the policy of our office in ensuring that outcome.

Where we are required to do a detailed assessment is when there are fundamental, nonmilitary-related activities that are being proposed that are essentially the motivation for the activity. The proposal that's coming to us is representing the opportunity or interest in doing a project that is outside of a military, direct military application where

⁷² Transcribed Interview with a compliance official for the Harvard Chan school.

we're assessing what the level of risk is. How much risk does that present to the Nation? How much risk does that present to the university? And also, is there a value that's being gained by that connection, that partnership in the sense that there's data or information that is being provided that is actually going to improve the research activity itself and those who benefit from it here in the United States and elsewhere.

I've offered an example. I know it's on my own field, but the issue of earthquake-related research is that you need to be studying earthquakes that occur around the world because of their infrequency. So there are sensors that record earthquakes that are globally distributed. We're dependent on information basically that they provide. They are provided -- some of them are maintained in China. Some of them are maintained in other parts of the world to ensure we've got global coverage. That would be an example of an area where we would be open to conducting a collaboration as long as the individuals weren't on the restricted parties list, there were no laws that were being broken.

So that's just an example of a process, an example that I certainly have understood directly to really reinforce why we need to do an assessment on a case-by-case basis of these projects.

The Committees could not make sense of this answer. Primarily because Harvard *did* co-author research papers with researchers at universities on a sanctioned party list. As described above they co-authored a research paper with a researcher at Beihang University which was listed prior to Harvard's engagement. As described below, a Harvard University researcher also co-authored a paper with a researcher at the National University of Defense Technology, another Chinese military-linked university on a restricted party list. In another example, a Harvard researcher is listed as a co-author on critical battery technology along with researchers from the Nanjing University of Science and Technology, a "Seven Sons of National Defense" institution that also appears on U.S. government entity lists.⁷³ In this research, the Harvard co-author specifically acknowledged support from the U.S. Department of Energy, while other researchers acknowledged support from the National Key R&D Program of China.⁷⁴ However, when the Committees interviewed another compliance official at the Chan School, Harvard's focus became clear. Harvard cared *primarily* about complying with the law as shown in the below exchange:

Q I mean, again, the deeper question is: [Beihang University] has been on the U.S. Government restricted list since 2001. Do you want your researchers conducting research with entities that are on a U.S. national security list?

⁷³ He Zhu et al., *Unlocking Oxygen Charge Compensation for Stabilized High-Voltage Structure in P2-Type Sodium-Ion Cathode*, 9 Adv. Sci. 2200498 (2022), <https://advanced.onlinelibrary.wiley.com/doi/pdfdirect/10.1002/advs.202200498>.

⁷⁴ *Id.* ("This study was supported by the National Key R&D Program of China (No. 2020YFA0406203) . . . Dr. Z. Yao is grateful to the support by the US Department of Energy, Office of Science – Chicago under Award No. DESC0019300.")

A I appreciate your point, and I know you want me to phrase it in a "yes" or a "no," but it's just more nuanced than that.

I want my researchers to follow the law. I want them to come to an export control administrator; I want it to go through a review. I want them to get a license if it's required.

Q You don't want your researchers to protect the human and intellectual capital from being diverted directly to a Chinese military organization?

Harvard Counsel ... for the record, I don't believe that's what she testified to.

Q No, I'm just asking the question, whether she agrees with that or not.

A ... I really understand the importance of this, and I don't want to come across in any way that I'm obfuscating or that I don't understand the importance of it. I think it's just important to recognize that our processes and our compliance program are absolutely built around following the law and conducting a thorough review....

As this exchange shows, Harvard's processes were centered on legal compliance, and because the law permitted collaboration with Chinese military-linked entities, they did. This is not how prudent research security is conducted. Research security is not intended to be a narrow, check-the-box exercise focused solely on adhering to the minimum requirements of the law. It is designed to protect the integrity of the research enterprise, ensure transparency in partnerships, and guard against the exploitation of U.S. taxpayer-funded research by foreign adversaries.

By reducing research security to a compliance function, Harvard ignores its broader responsibility to safeguard human capital, intellectual property, and the credibility of the academic system itself. A true research security framework requires institutions to assess risk holistically, exercise judgment, and avoid engagements that, while technically permissible, clearly advance the capabilities of foreign defense and security apparatuses.

Harvard's approach does the opposite. It treats legality as the ceiling rather than the floor, allowing collaborations to proceed even when the national security risks are evident. In doing so, it exposes fundamental research, talent, and innovation to exploitation by entities embedded in China's Military-Civil Fusion Strategy. This is not a failure of policy alone. It is a failure to uphold the core principles of research integrity, transparency, and responsible stewardship that universities claim to champion.

Finding 2: The Chinese Government Invited a Harvard Professor to Design and Conduct a Health Executive Education Series that May Have Included an Entity Sanctioned by the Treasury Department for Furthering the Uyghur Genocide.

The Committees began this investigation focused on allegations that Harvard held an executive education in China that included representatives from the XPCC. The U.S. Treasury Department sanctioned XPCC for its role in China's ongoing genocide against the Uyghur people.

In 2018, China established the National Healthcare Security Administration (NHSA) to introduce universal public health insurance,⁷⁵ but the Chinese government had a lot of questions about how to run it. To answer these questions, the Chinese government invited Harvard to educate them on how other countries run their systems. Dr. Yip, a Harvard professor and subject matter expert, was first contacted by the World Bank about setting up a course for the NHSA. Dr. Yip and NHSA's Department of International Cooperation then opened a dialogue about training NHSA. Dr. Yip agreed to a division of responsibilities where: (1) NHSA would handle domestic China policy updates and bring in the participants, and (2) Dr. Yip would recruit the international professors to provide a perspective on other countries' systems. They also agreed to set the date of the first executive education to be in November 2019. According to Dr. Yip, the individuals who would be attending were senior officials and managers (both national and provincial), many of whom do not have a background in social health insurance.⁷⁶ According to Dr. Yip, after she proposed topics within her areas of expertise, NHSA confirmed the content would be useful to them.⁷⁷

Dr. Yip then proceeded to recruit other professors for the November 2019 executive education. The executive education was ultimately held and included various international experience from countries such as Japan, Singapore, South Korea, Taiwan, and Germany. This course would run for multiple years covering similar topics. When the COVID-19 pandemic struck, the executive training course transitioned to an online format.

It is unclear whether XPCC ultimately attended one or more of Harvard's executive education seminars. Produced documents show there were instances where XPCC or its parent organization, the Xinjiang Uyghur Autonomous Region (XUAR) registered for the executive education.⁷⁸ For the 2019 iteration, both Harvard and the Chinese government issued a press release indicating the XPCC

⁷⁵ Wenhui Mao et al., *Improving Access to Medicines: Lessons from 10 Years of Drug Reforms in China, 2009-2020*, 7 *BMJ Glob. Health* 11 (2022), <https://pmc.ncbi.nlm.nih.gov/articles/PMC9639057/>.

⁷⁶ HRVD-HSC-000010228 at 5.

⁷⁷ Interview with Dr. Winnie Yip.

⁷⁸ Beginning with the initial executive training in 2019, NHSA's participant list included officials from national, provincial, city, and autonomous regions, including apparent members of the XPCC, which functions as an executive unit of the Chinese government responsible for administering healthcare and other services in Xinjiang. At that time, the XPCC was not a sanctioned entity.

attended, although Harvard subsequently removed that reference.⁷⁹ Harvard's contemporaneous attendance records for 2019 show XPCC's parent organization, XUAR signed up for the executive education, but the documents produced do not include XPCC.⁸⁰ For the 2020 iteration, as described in greater detail below, Harvard received a signup sheet that included XPCC, but the attendance records do not include XPCC.⁸¹ However, an email from Dr. Yip calls into question the reliability of this attendance information. When circulating the attendance information to the faculty, Dr. Yip writes "[a]ttached is the latest participants info, but it is still incomplete. I learned that there would be around 50 participants attending in person and another <200 online (they will not be asking questions)."⁸² The 2020 attendance list shows less than fifty people being present raising questions about whether there were online participants or in-person attendees who were not logged.

This executive education seminar continued. Harvard co-sponsored and facilitated executive training, including the Fifth Flagship Training Event on Health Care Financing in October 2023, an event intended to "aid China's healthcare policy design."⁸³ Again, the contemporaneous press release issued by the Chinese government specifically mentions XPCC.⁸⁴ In 2024, Harvard again held this event, and NHSA issued a press release mentioning XPCC's attendance.⁸⁵

⁷⁹ HARVARD T.H. CHAN SCH. OF PUB. HEALTH, *Inaugural Training Course on Health Financing with NHSA*, <https://web.archive.org/web/20240209120305/https://www.hsph.harvard.edu/china-health-partnership/research/training-nhsa/> (last visited May 13, 2025); see also HARVARD T.H. CHAN SCH. OF PUB. HEALTH, *Inaugural Training Course on Health Financing with NHSA*, <https://hsph.harvard.edu/research/china-health-partnership/executive-education/inaugural-training-course-on-health-financing-with-nhsa/> (last visited May 13, 2025).

⁸⁰ HRVD-HSC-000008784.

⁸¹ HRVD-HSC-000008775.

⁸² HRVD-HSC-000008771

⁸³ HARVARD T.H. CHAN SCH. OF PUB. HEALTH, *Fifth Flagship Training on Health Care Financing with China's NHSA*, <https://hsph.harvard.edu/research/china-health-partnership/executive-education/fifth-flagship-training-on-health-care-financing-with-chinas-nhsa-3/> (last visited May 13, 2025).

⁸⁴ NAT'L HEALTHCARE SEC. ADMIN., *The 5th International Medical Insurance Experience Learning Training Course of the National Health Security Administration Was Successfully Held* [国家医疗保障局第五期国际医保经验学习培训班成功举办], (Oct. 24, 2023), https://web.archive.org/web/20231026053125/http://www.nhsa.gov.cn/art/2023/10/24/art_14_11432.html.

⁸⁵ NAT'L HEALTHCARE SEC. ADMIN., *The 6th International Medical Security Experience Learning and Training Course of the National Health Insurance Administration Was Successfully Held in Guangxi* [国家医保局第六期国际医疗保障经验学习培训班在广西成功举办] (Nov. 1, 2024), https://www.nhsa.gov.cn/art/2024/11/1/art_14_14487.html.

Finding 3: Harvard Possessed Information a Treasury Sanctioned Entity Planned to Attend Its Online Executive Education and Proceeded Without Taking Further Action.

The Chinese government provided Dr. Yip information about who was attending ahead of time.⁸⁶ Dr. Yip requested attendance information from NHSA in advance of the executive trainings to assess the seniority level of participants and design the content of the executive trainings. She also testified she had no knowledge at the time that any attendees were affiliated with a sanctioned entity. The below is a screenshot of the spreadsheet produced by Harvard showing attendance ahead of the executive education.

训班报名回执-线上参会汇总情况表							
姓名	性别	年龄	单位	职务	职务	职务	职务
新疆兵团			Xinjiang Production and Construction Corps	兵团医疗保障局		Corps Medical Security	
新疆兵团			Xinjiang Production and Construction Corps	兵团医疗保障局二处		Division II, Corps Medical Security Bureau	
新疆兵团			Xinjiang Production and Construction Corps	兵团医疗保障局二处		Division II, Corps Medical Security Bureau	
新疆兵团			Xinjiang Production and Construction Corps	兵团医疗保障事业管理中心		Corps Medical Security Administration Center	
赵久洋			新疆兵团	兵团医疗保障局二处	处长	Redacted - PII	Redacted - PII
王若楠			新疆兵团	兵团医疗保障局二处	干部	Redacted - PII	Redacted - PII
陈文斌			新疆兵团	兵团医疗保障事业管理中心	主任	Redacted - PII	Redacted - PII

Figure 7 – Screenshot of the Attendance List for the 2020 Iteration of the Harvard Executive Education.

This prior notification gave Harvard and Dr. Yip advance knowledge that the Treasury sanctioned entity XPCC would be attending. The U.S. Treasury Department listed XPCC on the Specially Designated Nationals and Blocked Persons List in 2020.⁸⁷ In making the listing, the Treasury Department sanctioned the Chinese government entity for serious rights abuses against ethnic minorities in the Xinjiang Uyghur Autonomous Region.⁸⁸ However, Harvard failed to equip Dr. Yip with the knowledge and awareness to identify XPCC and take corrective action.

⁸⁶ A preliminary registration list produced by Harvard and provided to Dr. Yip in advance of the executive training included individuals affiliated with XPCC, though Dr. Yip testified that she did not notice their inclusion at the time because she had no knowledge that XPCC was a sanctioned entity, and that the preliminary list did not necessarily reflect who ultimately attended.

⁸⁷ U.S. DEP'T OF THE TREASURY, *Treasury Sanctions Chinese Entity and Officials Pursuant to Global Magnitsky Human Rights Executive Order* (July 31, 2020), <https://home.treasury.gov/news/press-releases/sm1073>.

⁸⁸ *Id.*

Finding 4: Harvard Likely Funded Treasury Sanctioned Officials to Learn Skills That Could Help Them Further Commit Human Rights Abuses Against the Uyghur People.

As the executive education progressed, the topics became more troubling. In parallel, Harvard's engagement with NHSA deepened. In the 2020 iteration of the executive education, the topics included online healthcare pricing and payment,⁸⁹ patient classification systems,⁹⁰ and how other countries analyze health systems.⁹¹ For the 2020 iteration, Dr. Yip again obtained a list of attendees ahead of time. XPCC appeared on the list, but Dr. Yip claims she did not notice their inclusion. She seemed more focused on making the NHSA look good: In an email sent discussing the feedback on the event, Dr. Yip writes "[t]hese positive feedback will make [the] NHSA organiser look good."⁹²

In 2024, Harvard deepened its cooperation by paying for the lodging for all attendees due to reported budgetary constraints at the NHSA. One of those attendees appeared to be affiliated with XPCC.⁹³

More troublingly, the topics presented by Chinese government personnel in 2024 included the integration of cloud systems holding medical information. This type of database integration could provide the backbone for a surveillance system. The below is a photo of the slide providing the overview of the integration framework.⁹⁴

⁸⁹ HRVD-HSC-000004533.

⁹⁰ HRVD-HSC-000004593.

⁹¹ HRVD-HSC-000004366.

⁹² HRVD-HSC-000008777.

⁹³ Letter from Counsel dated 8/29/2025.

⁹⁴ This slide was presented by a non-Harvard Chinese faculty member as part of a presentation on diabetes management. Dr. Yip testified that international faculty, including herself, did not review or provide input on Chinese faculty slides, and that this subject matter was outside her area of expertise.

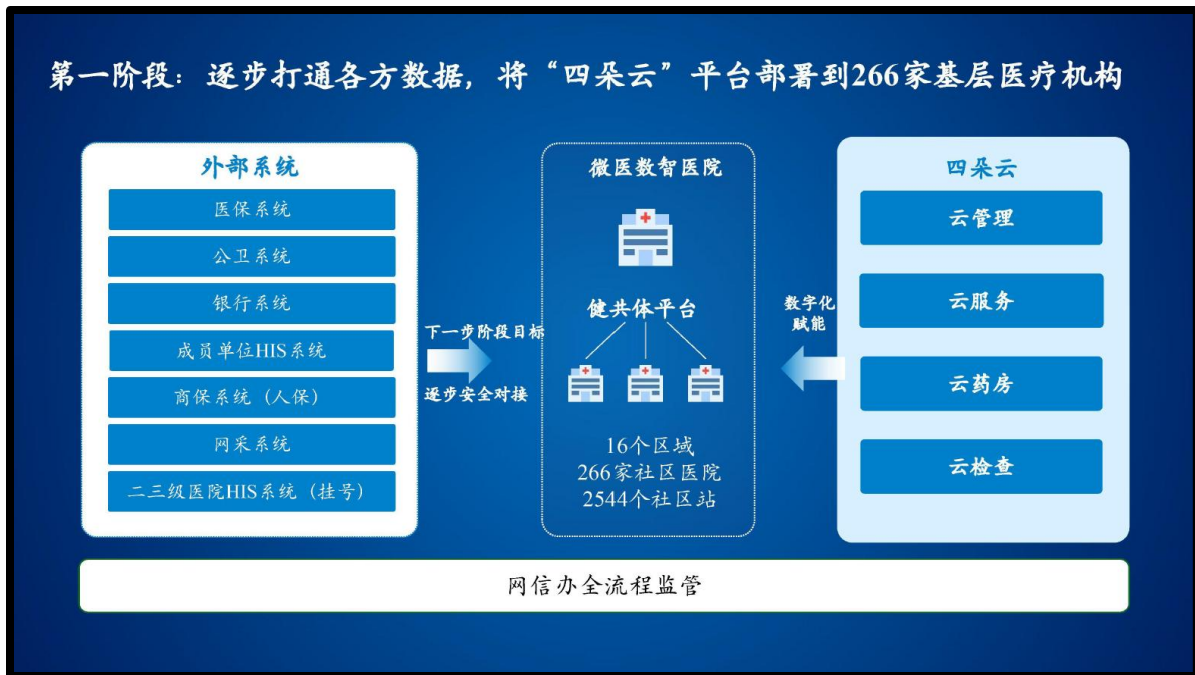


Figure 8 – Original Slide from Harvard Presentation at the Executive Education in China.

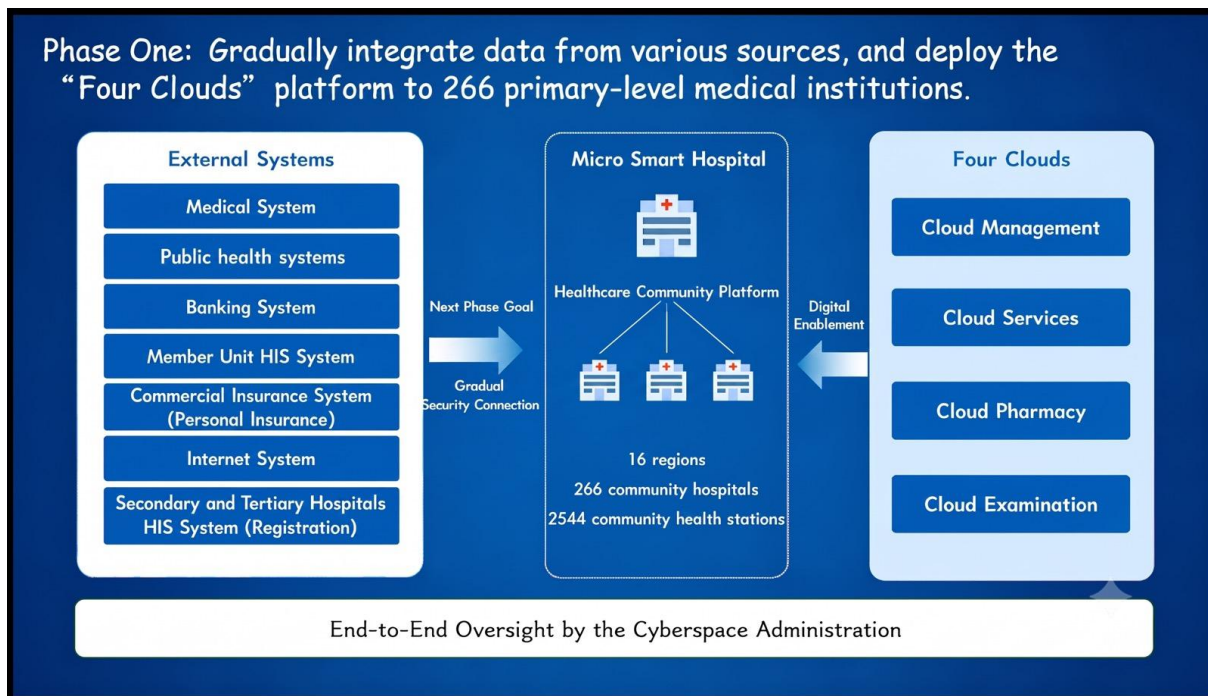


Figure 9 – Committee Translation of Previous Slide.

Finding 5: When the Allegations of Harvard’s Educating a Treasury Sanctioned Official Came to Light, Harvard’s First Priority Was Maintaining a Good Relationship with the Chinese Government.

In late 2024, Dr. Yip became aware XPCC potentially attended her executive education when a reporter contacted Harvard about a potential sanctions violation. In response to the reporters’ questions, Dr. Yip initially writes “[w]ow is all I can say! This is totally false and ungrounded. . . we do not know what the Xinjiang Production and Construction Corps (XPCC) is. We have never worked with or for it.”⁹⁵ Dr. Yip seemed most concerned with how the discussion of XPCC would affect Harvard’s relationship with China writing, “I am seriously concerned about these kinds of accusations as it can damage our school’s forty year’s collaboration with China-both government and academic colleagues . . .”⁹⁶ She concluded that paragraph by highlighting the danger of operating in China, writing “. . . [these accusations] can pose personal risk to me and other faculty (Harvard and International) who have worked so diligently to train and conduct research that serves the ONLY purpose to improve human welfare!!”⁹⁷

Then, the Harvard website mentioning XPCC’s attendance no longer referenced XPCC. The Committees asked how the reference was removed, and Dr. Yip responded she did not know who removed it or how it was removed. However, she did instruct a subordinate to “go through the [Harvard] website to see if there’s any language that was leading to a misrepresentation.”⁹⁸ Afterward, the Harvard website appeared without mentioning XPCC, while contemporaneous Chinese government press releases mentioned XPCC.

Finding 6: Harvard’s Lead Research Official Initially Refused to Recognize and Condemn China’s Ongoing Genocide Against the Uyghur People.

Since Harvard potentially played a role in educating Chinese officials implementing the Uyghur genocide, the Committees asked Harvard officials whether they believed the genocide is currently taking place. This question revealed Harvard’s true colors. Agreeing with the plethora of U.S. government evidence about the ongoing genocide would show Harvard believed the American government. Questioning the truth of these reports would show Harvard prioritizes the CCP narrative. Unfortunately, here again, the CCP’s influence resurfaced. Below is the exchange between Committee staff and the Harvard representative:

Q . . . we’ve talked a lot about sort of the sanctions on XPCC. So, I guess, would you agree that the Chinese Communist Party is committing genocide in Xinjiang?

⁹⁵ HRVD-HSC-000011432

⁹⁶ *Id.*

⁹⁷ *Id.*

⁹⁸ Yip Notes at 16.

A I honestly don't have the information to make an independent assessment of that. I certainly understand that that is the position that has been relayed by elements of our government, and I have trust in that.

Q Okay. So would it be your -- I guess then, to use your words, would it be your view that that is true?

A My view is that there are significant human rights concerns in Xinjiang Province and that we take those seriously, and we understand why XPCC in that regard has been placed on a restricted parties list.

I'm just saying I don't have firsthand knowledge of that in the sense I have not been there, I have not seen these kinds of activities occurring.

Afterward, Harvard's counsel paused the transcribed interview and spoke with his client about the response to this question, which then generated the response below:

A Thank you. I appreciate the opportunity to clarify my response to the last question.

I certainly, personally and professionally, of course, do not condone genocide. I think it's horrible. And we would certainly not intend to engage in any entity that was participating in genocide. I want to make that clear.

My response simply reflected the degree of firsthand knowledge I had, which is lacking. But I do not dispute the assertion that the Chinese Government is engaged in genocide against the Uyghurs. I do not dispute that. Okay?

Q Thank you.

A And it is, therefore, an important part of our understanding of why XPCC and other entities are on restricted parties list.

Q Thank you.

The best Harvard's representative could muster was that he did "not dispute the assertion that the Chinese Government is engaged in genocide against the Uyghurs."

Finding 7: Harvard's Research Security Program Allowed Numerous Research Collaborations that Undermine U.S. National Security and Bolstered Chinese Military and Technological Capabilities.

Harvard engaged with Chinese institutions for decades and even briefly held a program⁹⁹ with China's Tsinghua University to train up and coming Chinese Communist Party members.¹⁰⁰ When the Trump administration revoked Harvard's student visas, the Chinese government rushed to Harvard's defense

⁹⁹ Harvard represented to the Committees that it ended this program in 2016.

¹⁰⁰ Testimony to the Committee through a whistleblower.

stating the ban would harm America’s international standing.¹⁰¹ While China’s words seem genuine, they hide their real intention. China’s real interest in Harvard is Harvard’s cutting-edge research to bolster China’s military modernization efforts.

Harvard’s research activities with China date back to 1907, when Ernest Henry Wilson visited the Chinese city of Yichang to gather plant specimens for Harvard’s Arnold Arboretum.¹⁰² Harvard’s research collaboration with China has dramatically expanded beyond plant specimens to military sensitive technologies. According to data gathered by OpenAlex, Harvard’s engagement with China exploded after the turn of the century. The number of articles with co-authors listing Harvard affiliations and co-authors listing affiliations with Chinese entities rose to over 3,500 publications.¹⁰³

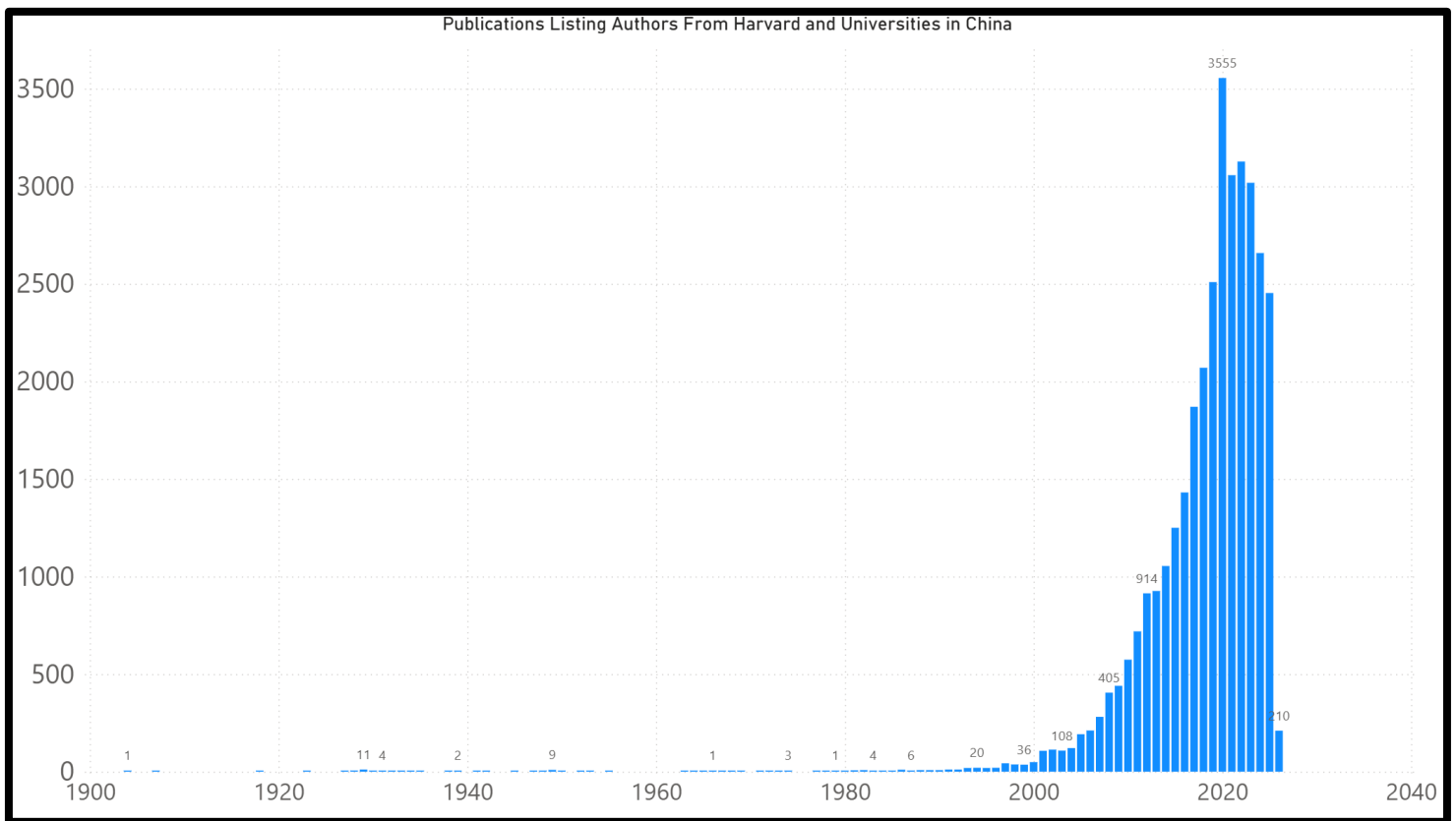


Figure 10 – Research Papers Listing Authors from Harvard University and Universities in China.

¹⁰¹ Huizhong Wu & Rajesh Roy, *China Criticizes US Ban on Harvard’s International Students*, AP News (May 23, 2025), <https://apnews.com/article/china-harvard-trump-international-students-dc443b16ebbd4cd099dec1f974c57691>.

¹⁰² *History of China at Harvard*, Harvard Uni., <https://fairbank.fas.harvard.edu/about/history-of-china-at-harvard/> (last visited February 11, 2026).

¹⁰³ OpenAlex, <https://openalex.org/>, (data retrieved on February 11, 2026).

This explosion of research included a significant number of dual-use areas. Unfortunately, this research was not a one-off occurrence, it happened systemically throughout Harvard's different schools.

Before describing examples of Harvard's conduct, it is important to define terminology. According to the International Committee of Medical Journal Editors, designating someone as an author, also called conferring authorship, denotes credit and has important academic, social, and financial implications.¹⁰⁴ This organization recommends that someone meets four criteria to qualify for authorship:

1. Substantial contributions to the conception or design of the work; or the acquisition, analysis, or interpretation of data for the work, and
2. Drafting the work or reviewing it critically for important intellectual content, and
3. Final approval of the version to be published, and
4. Agreement to be accountable for all aspects of the work in ensuring that questions related to the accuracy or integrity of any part of the work are appropriately investigated and resolved.

While different papers will have different requirements, this background shows the importance attached to being designated a co-author. This section will highlight a series of examples. In each, Harvard-affiliated personnel provided contributions to such a degree that they were labeled a co-author.

A. Collaboration with the National University of Defense Technology

A Harvard researcher worked with the China-based National University of Defense Technology (NUDT) to such a degree that he was labeled a co-author on the subsequent paper. As the name suggests, NUDT's mission is to train high-quality military talent and serve as a ground for independent innovation in China's defense science and technology.¹⁰⁵ This university plays such an important role in the Chinese military revitalization effort, that paramount leader Xi Jinping gave the university a flag and attended a parade at the institution as shown in the photos below.¹⁰⁶

¹⁰⁴ *Defining the Role of Authors and Contributors*, *Int'l Comm. Med. J. Ed.*, <https://www.icmje.org/recommendations/browse/roles-and-responsibilities/defining-the-role-of-authors-and-contributors.html#three> (last visited June 23, 2026).

¹⁰⁵ Introduction [科大简介], Nat'l Univ. Def. Tech. [国防科技大学], <https://www.nudt.edu.cn/xxgk/kdjj/index.htm> (last accessed Feb. 11, 2026).

¹⁰⁶ National University of Defense Technology, <https://www.nudt.edu.cn/xxgk/kdjj/index.htm> (last visited June 4, 2026).



Figure 11 – Photos of Chinese Paramount Leader Xi Jinping Handing a Flag to NUDT and Attending a Military Parade at NUDT.

On top of all this, the United States government listed NUDT on the entity list as a threat to American national security in 2015.¹⁰⁷ In making this listing, the Bureau of Industry and Security determined that NUDT “used U.S.-origin multicores, boards, and (co)processors to produce the TianHe-1A and TianHe-2 supercomputers. . . [t]he TianHe-1A and TianHe-2 supercomputers are believed to be used in nuclear explosive activities . . .”¹⁰⁸

Despite these serious warnings dating back to 2015, a Harvard-affiliated researcher co-authored a research paper with a NUDT researcher that was published as recently as 2023. For this paper, a Harvard co-author and NUDT co-author worked on magnetic material research.¹⁰⁹ The research itself was initiated by the NUDT co-author and the Harvard co-author assisted in analyzing the data.¹¹⁰ As part of this paper, the Harvard researcher acknowledged partial support from the United States Army Research Office.¹¹¹ Magnets have direct military application. For example, rare earth magnets have defense applications including the F-35 aircraft, Columbia class submarines, and unmanned aerial vehicles.¹¹²

¹⁰⁷ Addition of Certain Persons to the Entity List; and Removal of Person From the Entity List Based on a Removal Request, 80 Fed. Reg. 8524 (Feb. 18, 2015).

¹⁰⁸ *Id.*

¹⁰⁹ Lan-Anh T. Nguyen et al., Digital Science Dimensions AI Platform, *Electrically Tunable Magnetic Fluctuations in Multilayered Vanadium-Doped Tungsten Diselenide*, 6 Nature Electronics 582 (2023), <https://doi.org/10.1038/s41928-023-01002-1>.

¹¹⁰ *Id.* (“L.-A.T.N., J.J. and D.L.D. initiated this work. . . L.-A.T.N., P.K., M.-K.J., D.L.D. and Y.H.L. analysed the data. All authors discussed and wrote the manuscript.”)

¹¹¹ *Id.*

¹¹² C. Todd Lopez, *DoD Looks to Establish ‘Mine-to-Magnet’ Supply Chain for Rare Earth Materials*, Dep’t Defense Manu. Tech. Prog. (March 11, 2024), <https://www.dodmantech.mil/News/News-Display/Article/3700059/dod-looks-to-establish-mine-to-magnet-supply-chain-for-rare-earth-materials/>.

B. Supporting Both Teams: How Dr. Eric Mazur Supports Research Funded by the U.S. and Chinese Governments

In May 2016, Dr. Mazur visited the Sichuan University - Pittsburgh Institute to discuss physics education.¹¹³ That was only the start of his speaking career in China. In November 2017, Dr. Mazur gave a talk at Zhejiang University on ways to improve teaching quality, another of his areas of expertise.¹¹⁴ In December 2018, Dr. Mazur again returned to Sichuan University to give a talk about people's current understanding of time as well as the physical definition and cognition of time.¹¹⁵ All this speaking increased demand for his time to such a degree that his speaking fees run between \$10,000 and \$20,000 for a live event in March 2026.¹¹⁶

During this time, Dr. Mazur was also working on research funded by both the U.S. government and the Chinese government. In 2016, Dr. Mazur co-authored a research paper funded by the NIH,¹¹⁷ and in 2017, Dr. Mazur co-authored an educational research paper funded by the Beijing Normal University.¹¹⁸ All this would not be a problem, except Dr. Mazur also conducts sensitive defense research on behalf of the Pentagon.

Dr. Mazur conducts research on various topics including zero-index materials and other areas of physics that have military applications. Dr. Mazur was listed as a co-author on two papers at roughly the same time, one funded by the Pentagon, the other partially funded by two institutions in China. In 2021, Dr. Mazur worked on published physics papers funded by both the Defense Advanced Research Projects Agency (DARPA)¹¹⁹ as well as the National Natural Science Foundation of China and the Beijing Natural Science Foundation.¹²⁰ Afterward, Dr. Mazur continues to co-author publications with PRC-based universities on research with defense applications, including one paper in 2023 with a sensitive U.S. military lab at the Massachusetts Institute of Technology.¹²¹

¹¹³ Lecture by Dr. Eric Mazur, SCUPI (May 28, 2016), <https://scupi.scu.edu.cn/en/activities/lecture-by-dr-eric-mazur>.

¹¹⁴ Professor Eric Mazur from Harvard University Was Invited to Lecture in Our Center, Zhejiang University (Nov. 21, 2017), <https://ugrs.zju.edu.cn/ugrsen/2017/1121/c28281a1160675/page.htm>.

¹¹⁵ Renowned Professor Eric Mazur of Harvard University Deliver a Frontier Academic Report and Teaching Seminar in SCU, Sichuan Uni. (Dec. 31, 2018, <https://international.scu.edu.cn/info/1044/1030.htm>).

¹¹⁶ Eric Mazur, AAE Speakers, <https://www.aaespeakers.com/keynote-speakers/eric-mazur>, (last visited March 3, 2026).

¹¹⁷ Samuel Chung et al., *Novel DLK-independent Neuronal Regeneration in Caenorhabditis Elegans Shares Links with Activity-Dependent Ectopic Outgrowth*, 113 Proc. Nat'l Aca. Sci. E2852 (2016), <https://pubmed.ncbi.nlm.nih.gov/27078101/>.

¹¹⁸ Ping Zhang et al., *Peer Instruction in Introductory Physics: A Method to Bring About Positive Changes in Students' Attitudes and Beliefs*, 13 Phys. Rev. Phys. Edu. Res. 010104 (2017), <https://journals.aps.org/prper/abstract/10.1103/PhysRevPhysEducRes.13.010104> ("This work is supported by 2015 Comprehensive Discipline Construction Fund of Faculty of Education, Beijing Normal University (No. 2015GJXM002).")

¹¹⁹ Haoning Tang et al., *Modeling the Optical Properties of Twisted Bilayer Photonic Crystals* 10 Light: Sci. & Apps 157 (2021), <https://www.nature.com/articles/s41377-021-00601-x.pdf>.

¹²⁰ Yang Li et al., *Dirac-like Cone-based Electromagnetic Zero-index Metamaterials*, 10 Light: Sci. & Apps 203 (2021), <https://www.nature.com/articles/s41377-021-00642-2.pdf>.

¹²¹ Yi Yang et al., *Photonic Flatband Resonances for Free-Electron Radiation*, Nature (Jan. 4, 2023), <https://www.nature.com/articles/s41586-022-05387-5>.

Dr. Mazur also supported China by training its future scientists, thereby furthering China's military modernization efforts. In 2015, Dr. Mazur hired a research associate in his lab who worked for Dr. Mazur until 2019.¹²² This research associate left Dr. Mazur's lab for the Jihua Laboratory in Guangdong province China.¹²³ The Jihua Laboratory specifically calls out its place in China's high technology development and its place in China's Military-Civil Fusion ecosystem.¹²⁴ At the time of its opening, the Jihua Laboratory stated that it would be building "Military-Civil Fusion innovation platforms."

Dr. Mazur also trained another postdoc student beginning in January 2013.¹²⁵ This postdoc then went on to join Tsinghua University,¹²⁶ a Chinese university with deep connections to the Chinese military through its military-linked labs.¹²⁷ After returning to China, this researcher continued research in the areas begun with Dr. Mazur. However, his new partners worked at a Chinese military institution, specifically Beihang University.¹²⁸ While it is unknown what caused him to train China's future defense scientists, Dr. Mazur's honorary professorships at Chinese universities may have incentivized him to train these future scientists.

Dr. Mazur publicly lists various honorary professorships at Chinese universities, which are a key vector for talent recruitment.¹²⁹ Dr. Mazur's Harvard University profile does not list his associations with various Chinese entities,¹³⁰ however, his speaking profile mentions his honorary professorships.¹³¹ All of them are Chinese, and one is a "Seven Sons" university.

¹²² *Call for Papers, Light: Advanced Manufacturing*, https://www.light-am.com/news/index_tabliod_en/3c3f172e-96c2-4c6b-b028-7fa25972fe65_en.htm, (last visited March 3, 2026).

¹²³ *Id.*

¹²⁴ [5 年投入 55 亿元！佛山举全市之力建设季华实验室], Foshan Government [佛山发布] (Apr. 25, 2018) https://www.thepaper.cn/newsDetail_forward_2095418

¹²⁵ *Alumni*, Mazur Group Harvard, <https://mazur.harvard.edu/alumni> (last visited March 10, 2026).

¹²⁶ *Chinese Aca. Sci., Towards Applications: Ultra-low-loss On-Chip Zero-Index Materials* (Jan. 15, 2021), <https://phys.org/news/2021-01-applications-ultra-low-loss-on-chip-zero-index-materials.html>.

¹²⁷ Dep't Defense, Military and Security Developments Involving the People's Republic of China (2024), <https://media.defense.gov/2024/Dec/18/2003615520/-1/-1/0/MILITARY-AND-SECURITY-DEVELOPMENTS-INVOLVING-THE-PEOPLES-REPUBLIC-OF-CHINA-2024.PDF>.

¹²⁸ Yueyang Liu et al., *High-Permittivity Ceramics Enables Highly Homogeneous Zero-Index Metamaterials for High-Directivity Antennas and Beyond*, *eLight* vol. 4, art. 4 (2024), <https://link.springer.com/article/10.1186/s43593-023-00059-x>.

¹²⁹ Professor Mazur's profile also includes his accolades such as honorary doctorates from Canada, Peru, and Belgium.

¹³⁰ *Eric Mazur*, Harvard Uni., <https://www.physics.harvard.edu/people/facpages/mazur> (last visited March 10, 2026).

¹³¹ *Eric Mazur*, AAE Speakers, <https://www.aaespeakers.com/keynote-speakers/eric-mazur#profile>, (last visited March 3, 2026).

ERIC MAZUR ★★★★★ 1 rating

Keynote Speaker: Balkanski Professor of Physics, Optical Physics Researcher, Founder of Tech Companies

✈ **Travels From:** [Boston, MA, USA](#)

💰 **Speaking Fee:** [Live Event Fee: \\$10,000 - \\$20,000](#)
[Virtual Event Fee: Below \\$10,000](#)
[More Fee Info](#)

🏷 **Categories:** [Technology](#), [Professors](#), [Entrepreneurship](#), [Author](#), [Educational](#), [Motivational](#), [Physics](#)

Eric Mazur Biography

Dr. Mazur came to Harvard University in 1982 after obtaining his Ph.D. at the University of Leiden in the Netherlands. In 1984 he joined the faculty and obtained tenure six years later. Dr. Mazur has made important contributions to spectroscopy, light scattering, the interaction of ultrashort laser pulses with materials, and nanophotonics. Dr. Mazur holds Honorary Doctorates from the Ecole Polytechnique and the University of Montreal, Universidad Nacional Mayor San Marcos, Lima, Peru, and the Katholieke Universiteit Leuven, Leuven, Belgium. **He holds Honorary Professorships from Beijing University of Technology, Beijing Normal University, Sichuan University, Nanjing University of Science and Technology, and the Institute of Semiconductor Physics of the Chinese Academy of Sciences.**

Eric Mazur has received numerous awards, including the Esther Hoffman Beller award from the Optical Society of America and the Millikan Medal from the American Association of Physics Teachers. In 2014 Mazur became the inaugural recipient of the Minerva Prize for Advancements in Higher Education. He is Fellow of the Optical Society, of the American Physical Society, and of the American Association of Physics Teachers. He is a Member of the Royal Academy of Sciences of the Netherlands and a Member of the Royal Holland Society of Sciences and Humanities. He has held appointments as Visiting Professor or Distinguished Lecturer at Princeton University, Vanderbilt University, the University of Leuven in Belgium, National Taiwan University in Taiwan, Carnegie Mellon University, and Hong Kong University.

Contact a speaker booking agent to check availability on Eric Mazur and other top speakers and celebrities.

Figure 12 – Biography of Professor Eric Mazur Taken from His Speaker Site Showing He Holds Honorary Professorships at Various Chinese Universities.

As shown above, Dr. Mazur’s speaker profile states he holds an honorary professorship at the Nanjing University of Science and Technology,¹³² which is a “Seven Sons” university.¹³³

Historical internet archives show the speaking agency updated Dr. Mazur’s speaker profile between December 2022 and March 2023 to add the honorary professorships at Chinese universities, among other items.¹³⁴ Despite being an honorary professor at a Chinese military-linked university, Dr. Mazur continued working on Pentagon-funded research. In January 2023, Dr. Mazur co-authored a research paper funded by various Pentagon institutions including the Institute for

¹³² *Id.*

¹³³ Dep’t Defense, Military and Security Developments Involving the People’s Republic of China (2024), <https://media.defense.gov/2024/Dec/18/2003615520/-1/-1/0/MILITARY-AND-SECURITY-DEVELOPMENTS-INVOLVING-THE-PEOPLES-REPUBLIC-OF-CHINA-2024.PDF>.

¹³⁴ *Eric Mazur*, AAE Speakers (archived), <https://web.archive.org/web/20230331021937/https://www.aaespeakers.com/keynote-speakers/eric-mazur#profile>, (last visited March 3, 2026).

Soldier Nanotechnologies.¹³⁵ According to the paper generated by this research, Dr. Mazur supervised the research that was funded by two Chinese entities.¹³⁶ In an April 2025 research publication, Dr. Mazur and other Harvard researchers acknowledged support from DARPA and other Pentagon entities.¹³⁷

In sum, a Harvard professor with a publicly disclosed affiliation to a Chinese “Seven Sons of National Defense” university participated in Pentagon-funded research in areas with defense applications. That same professor also trained multiple scientists that now support China’s military research and development complex by working at or with military-linked institutions in China.

C. Harvard Professors Across Dozens of Disciplines Conducted Research with “Seven Sons” Universities

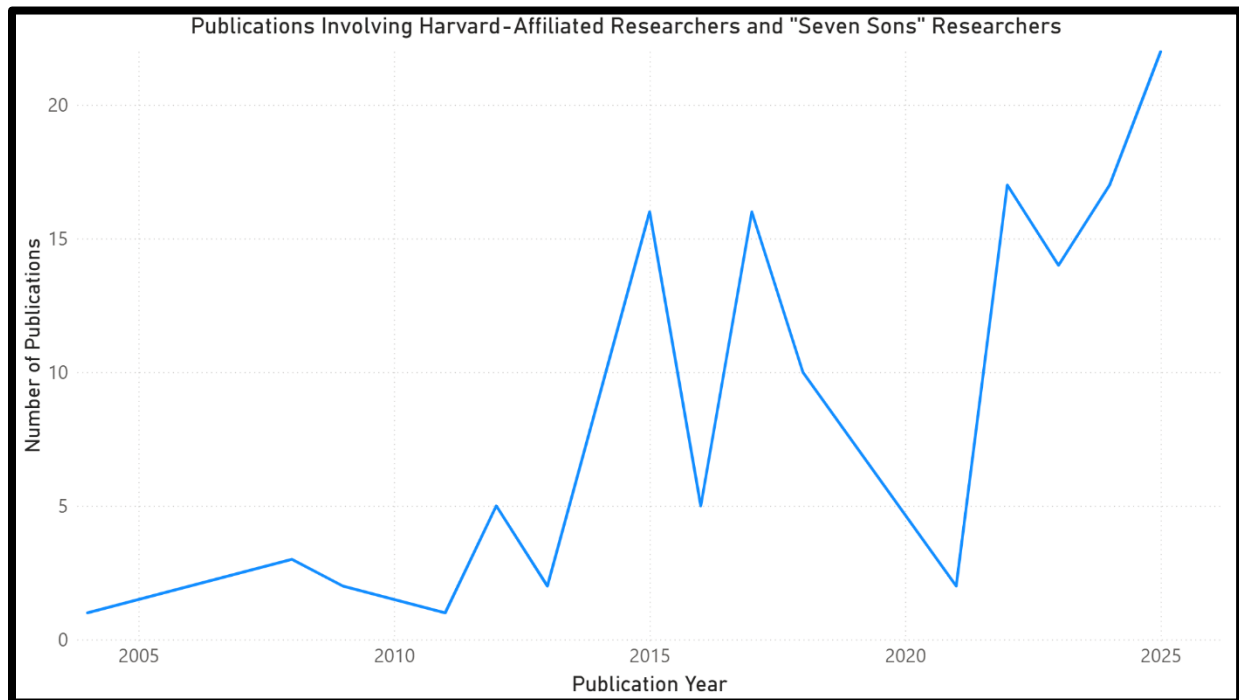


Figure 13 – Graph Showing Papers Listing Harvard Researchers and Researchers from “Seven Sons of National Defense” Universities Over Time.

To illustrate the systemic nature of the collaboration, the Committees reviewed Harvard-affiliated researchers’ collaboration across multiple disciplines and subject matter areas. The Committees identified more than 140 publications listing a Harvard-affiliated co-author and a co-author associated with a “Seven Sons” university. The number varies over the years and appears to have increased in recent years as shown in the chart above.

¹³⁵ Yi Yang et al., Photonic Flatband Resonances for Free-Electron Radiation, 613 Nature 42 (2023), <https://www.nature.com/articles/s41586-022-05387-5>.

¹³⁶ *Id.*

¹³⁷ Haoning Tang et al., An Adaptive Moire Sensor for Spectro-Polarimetric Hyperimaging, 19 Nat. Photonics 463 (2024), <https://www.nature.com/articles/s41566-025-01650-z>.

When the papers' subjects are analyzed,¹³⁸ a topic dominates the list: engineering.

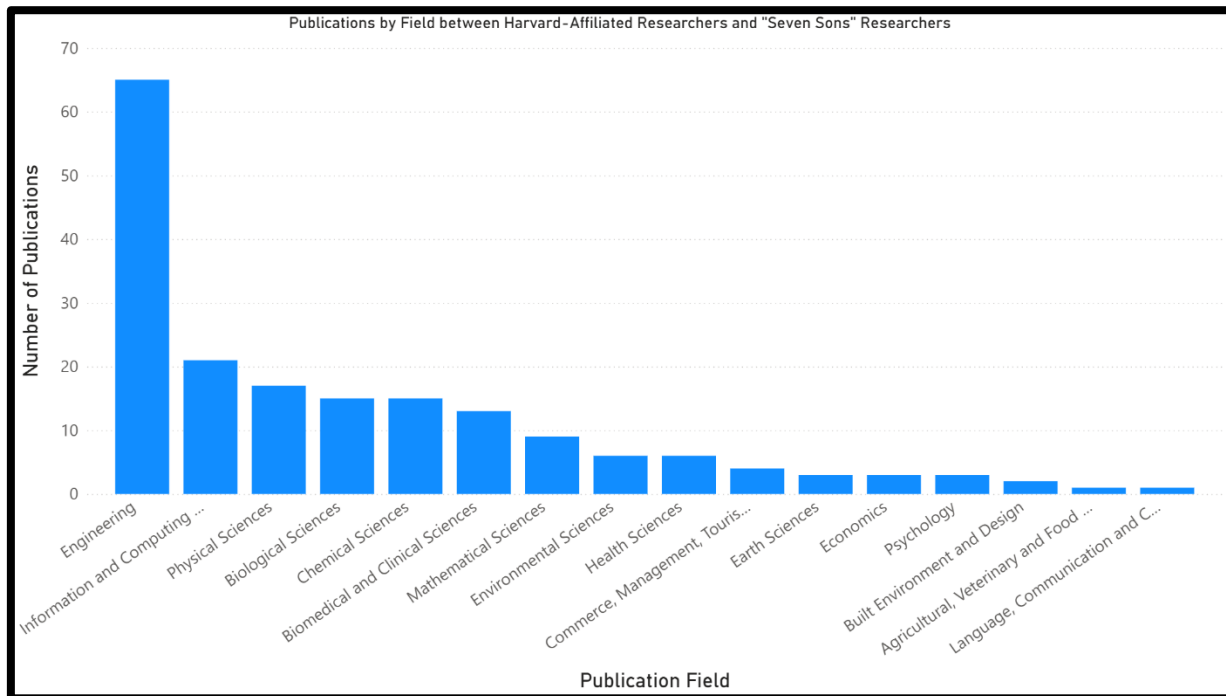


Figure 14 - Graph Showing Papers Listing Harvard Researchers and Researchers from “Seven Sons of National Defense” Grouped by Subject Matter.

This data paints a stark picture. Harvard-affiliated researchers are systematically engaging with Chinese universities that, as a matter of policy, conduct extensive weapons research and development and hold top-secret security clearances with the PLA. It did not happen a few times. It happened systematically, over several years. Additionally, their area of focus, engineering, is an area where key dual-use technology is developed.

Finding 8: Harvard Claimed to Lack the Infrastructure to Identify, Track, and Screen University Partnerships to Protect U.S. National Security.

When it comes to accounting for donated funds, Harvard devotes the utmost resources. When Morningside Foundation, on behalf of Gerald Chan donated \$350 million to Harvard University, Harvard University administrators pored over the details of the contract. One email exchange shows Harvard looked closely at the terms of the donor agreement to ensure it was classified correctly.¹³⁹ When it comes to working with military-linked institutions tied to our greatest adversary and an authoritarian regime, however, Harvard takes a different stance.

From the investigation's inception, the Committees' investigators requested a list of Harvard University's partnerships with Chinese entities. Over the course of

¹³⁸ Note that some papers may relate to multiple topics. Where a paper relates to multiple topics, it was included twice.

¹³⁹ HRVD-HSC-000000854-56.

multiple phone calls spanning months, the Committees' investigators repeatedly requested a single list of Chinese universities that collaborated with Harvard University. At first, Harvard University, through its attorneys stated generating this list was cumbersome given the broad scope of the request.¹⁴⁰ Months later, after no complete production was forthcoming, Committee investigators identified databases holding this information. Harvard then informed the Committee that it would be burdensome to search these databases to find the entries related to Chinese universities. Later, a witness stated to the Committee that at least one of the key databases included a field allowing the user to search by country. When Committee investigators finally received the printout, it was only a less than 50-entry spreadsheet included in this report as Attachment A.

This episode illustrates one key fact: Harvard was either unwilling or unable to give the Committees a simple list of Chinese universities with whom it collaborates. One would expect a Tier 1 research organization who currently holds more assets than a sovereign nation to be able to supply a simple list of which Chinese entities it collaborates with. It could not or would not.

Finding 9: Harvard Created a Third-Party Entity Staffed by Its Own Employees that Appears to be Designed to Circumvent Gift Reporting Requirements.

Many foreign governments view investing in key American universities as a long-term strategy to advance their interests. They know today's students could be tomorrow's senators, business leaders, or agency heads. By using funds to influence what is said and taught about their country on campus, they can shape these future leaders' perceptions of their country. To address this foreign influence on U.S. campuses, Congress enacted Section 117 of the Higher Education Act of 1965 to require universities to disclose foreign funding.¹⁴¹ The U.S. Department of Education (ED) has highlighted the damaging effect of Chinese government money spent at U.S. universities.¹⁴² However, Harvard failed to address this threat and continued to accept Chinese government money.

Harvard also appears to operate an entity that could be used to circumvent reporting restrictions: Harvard Global Research and Support Services, Inc (Harvard Global).¹⁴³ Specifically, its website once stated:

When there's a compelling reason to pursue a specific award, *but the University is unable to accept the sponsor's terms due to legal or financial reasons, we may be able to act as the proposal applicant and awardee.* Although we are formally awarded and accept the sponsored funding, Harvard University researchers perform all research activities using University resources, all

¹⁴⁰ Harvard University, Harvard Report Feedback Spreadsheet F44 (June 10, 2026).

¹⁴¹ 20 U.S.C. § 1011(f); Pub. L. No. 99-498, 100 Stat. 1268,1574, Title XII, § 1206 (Oct. 17, 1986).

¹⁴² See e.g. *id.*; Elizabeth Redden, *Colleges Under Fire For Foreign Gift Reporting*, Inside Higher Ed. (Oct. 20, 2020), <https://www.insidehighered.com/news/2020/10/21/education-department-issues-report-finding-noncompliance-foreign-gift-reporting>.

¹⁴³ *About Us*, Harvard Global, <https://www.harvardglobal.org/about-us> (last visited June 4, 2026).

under contract to us for the term of the award. We use inter-company agreements to clearly establish the relationship and rules of engagement between us, the Harvard School, department, and the researchers.¹⁴⁴

Harvard Global has since deleted the language on its website after the Committees transmitted a draft report to Harvard's outside counsel for review.

This is not by accident. Early in the organization's history, it planned to accept grants from foreign donors and then structure a research relationship with Harvard. Below is a screenshot from Harvard Global's IRS Form 990 for tax year 2011, showing it specifically structured its operations this way.¹⁴⁵

FORM 990-EZ, PART III, LINE 28, PROGRAM SERVICE ACCOMPLISHMENTS:
HARVARD GLOBAL WILL SEEK RESEARCH GRANTS FROM FOREIGN
GRANTMAKERS. HARVARD GLOBAL WILL IN TURN USE THE FUNDING
FROM THE GRANTS TO PAY FOR THE SERVICES OF HARVARD
FACULTY, STUDENTS, AND OTHERS TO CONDUCT THE RESEARCH.

Figure 15 – Screenshot from the First IRS Form 990 Filed by Harvard Global Showing Its Intended Purpose.

Furthermore, these tax records paint a troubling picture of this organization and those at Harvard who had knowledge of its operations. Tax records show it started in or around February 2012.¹⁴⁶ Then its revenue expanded exponentially. Its tax year 2011 return showed transfers from Harvard University of roughly \$147,000.¹⁴⁷ The tax year 2012 IRS filing shows revenue of roughly \$621,000.¹⁴⁸ Fast forward to tax year 2023, and Harvard Global's revenue exceeded \$7M.¹⁴⁹ That is a greater than ten-fold increase in Harvard's revenue through this non-profit entity.

ED issued guidance in November 2023 outlining scenarios in which foreign gifts and contracts should be reported and urged institutions then (and now) to conduct "due diligence" in their reporting of foreign contracts and gifts under Section 117.¹⁵⁰ Some of the scenarios include the following:

¹⁴⁴ *International Grant Administration*, Harvard Global, <https://www.harvardglobal.org/our-services/international-grant-administration> (last visited March 13, 2026).

¹⁴⁵ Harvard Global Research & Support Services, Inc., Return of Organization Exempt from Income Tax (Form 990) (tax year 2011), Internal Revenue Service.

¹⁴⁶ *See id.* (showing the "initial return" box checked).

¹⁴⁷ *Id.*

¹⁴⁸ Harvard Global Research & Support Services, Inc., Return of Organization Exempt from Income Tax (Form 990) (tax year 2012), Internal Revenue Service.

¹⁴⁹ Harvard Global Research & Support Services, Inc., Return of Organization Exempt from Income Tax (Form 990) (tax year 2023), Internal Revenue Service.

¹⁵⁰ <https://fsapartners.ed.gov/knowledge-center/topics/section-117-foreign-gift-and-contract-reporting/resources/frequently-asked-questions>.

- Institutions' campuses outside of the United States;
- Intermediaries operating under the auspices of, or on behalf of, an institution;
- Organizations outside of an institution's direct control that benefit the institution; and
- Sources that may be determined to be a foreign source.

Both its namesake and purpose indicate that Harvard Global would fall under the definition of an intermediary. An intermediary under Section 117 "may be a legal entity other than an institution that receives a gift originating from or enters into a contract with a foreign source and then passes to an institution part or all of the benefit of the gift from or contract with the foreign source."¹⁵¹ Harvard appears not to be complying with the requirement to report contracts and gifts from intermediaries, which would correlate with Harvard's questionable track record of compliance with Section 117.

Harvard holds the distinction of being the only institution that has received two different Section 117 compliance reviews. In February 2020, the Trump administration opened a Section 117 compliance investigation of Harvard.¹⁵² ED said that it was "aware of information suggesting Harvard University lacks appropriate institutional controls and, as a result, its statutory Section 117 reporting may not include and/or fully capture all reportable gifts, contracts, and/or restricted and conditional gifts or contracts from or with foreign sources."¹⁵³ ED specifically referenced the charges of Dr. Lieber as well as two additional Chinese nationals in this compliance investigation.¹⁵⁴

In December 2024, the Biden administration announced a completion of the Section 117 investigation.¹⁵⁵ This closure letter stated that ED appreciated the "collaborative and responsive way in which Harvard worked with the Department throughout this investigation."¹⁵⁶ The letter included an "ATTESTATION and AGREEMENT" (Attestation) signed by Harvard indicating that Harvard was current in its submission of Section 117 data, that it has "written procedures and systems in place designed to address and achieve compliance with Section 117" and has not "knowingly or willfully failed to comply" with Section

¹⁵¹ Electronic Announcement, INS-Q2, Frequently Asked Questions, Office of Federal Student Aid, U.S. Dept. of Educ., (Nov. 29, 2023), <https://fsapartners.ed.gov/knowledge-center/topics/section-117-foreign-gift-and-contract-reporting/resources/frequently-asked-questions>.

¹⁵² U.S. Dep't of Educ., Office of Gen. Counsel, Letter to Lawrence S. Bacow, President, Harvard Univ., Re: Notice of 20 U.S.C. § 1011f Investigation and Record Request/Harvard University (Feb. 11, 2020), <https://fsapartners.ed.gov/sites/default/files/2023-04/HarvardUniversityFebruary112020.pdf>.

¹⁵³ *Id.*

¹⁵⁴ U.S. Dep't Just., *Harvard University Professor and Two Chinese Nationals Charged in Three Separate China Related Cases* (Jan. 28, 2020), <https://www.justice.gov/usao-ma/pr/harvard-university-professor-and-two-chinese-nationals-charged-three-separate-china>.

¹⁵⁵ U.S. Dep't of Educ., Office of Gen. Counsel, Letter to Alan Garber, President, Harvard Univ., Re: Conclusion of 20 U.S.C. § 1011f Investigation (Harvard University) (Dec. 26, 2024), <https://fsapartners.ed.gov/sites/default/files/2025-02/HarvardClosureLetter.pdf>.

¹⁵⁶ *Id.*

117.¹⁵⁷ In the Attestation, Harvard agreed to provide updated disclosures for gifts and contracts between 2014 and 2019.¹⁵⁸

Unfortunately, the Attestation raises questions of veracity. Although the first review was closed in December 2024, the Department later reviewed Harvard's data and opened a new Section 117 review of Harvard a mere four months later in April 2025.¹⁵⁹ The Department had found "incomplete and inaccurate disclosures," including "non-compliant transaction disclosures" and "submission of anonymous donors."¹⁶⁰ The Department expressly said that incomplete and inaccurate disclosures were "once again" provided to the Department, and the errors were also present in the reportedly "amended" disclosures for gifts and contracts between 2014-2019 submitted from Harvard under the terms of the previous December 2024 agreement.¹⁶¹ The Department stated that Harvard had "historical familiarity" with its Section 117 statutory disclosure obligations as well as "robust and well-funded" compliance capabilities.¹⁶² However, the Department also stated, "Despite its resources and capabilities for compliance with federal disclosure requirements, critical aspects of Harvard's recent foreign funding disclosure submissions are a cause for concern with the Department—particularly in light of the Department's previous investigation of Harvard..."¹⁶³ This investigation remains open.

The intended purpose of Harvard Global to operate as a pass-through entity, combined with Harvard's history of poor Section 117 compliance, raises serious alarm bells about accurate reporting of foreign monetary contributions.

* * *

RECOMMENDATIONS

Adopt the Defending Education Transparency and Ending Rogue Regimes Engaging in Nefarious Transactions (DETERRENT) Act to Require Enhanced Transparency from Universities and Researchers of Foreign Gifts and Contracts.

As mentioned above, Section 117 of the Higher Education Act provides much needed transparency, but reforms are needed to address inadequate reporting and

¹⁵⁷ Attestation Enclosed with Letter to Alan Garber, President, Harvard Univ., Re: Conclusion of 20 U.S.C. § 1011f Investigation (Harvard University) (Dec. 26, 2024), <https://fsapartners.ed.gov/sites/default/files/2025-02/HarvardClosureLetter.pdf>. The signature of Rita Kalra, Harvard's Chief Financial Officer and Vice President for Finance has been redacted.

¹⁵⁸ U.S. Dep't of Educ., Office of Gen. Counsel, Letter to Alan M. Garber, President, Harvard Univ., Re: Notice of 20 U.S.C. § 1011f Investigation (Apr. 17, 2025), <https://fsapartners.ed.gov/sites/default/files/2025-05/NoticeofSec.117InvestigationHarvardApril172025.pdf>

¹⁵⁹ *Id.*

¹⁶⁰ *Id.*

¹⁶¹ *Id.*

¹⁶² *Id.*

¹⁶³ *Id.*

improve enforcement of federal requirements. On February 6, 2025, Representative Michael Baumgartner (R-WA) introduced the DETERRENT Act (H.R. 1048) along with 21 co-sponsors, including the Chairman of the Select Committee Rep. John Moolenaar (R-MI) and the Chairman of the House Committee on Education and Workforce Rep. Tim Walberg (R-MI).¹⁶⁴ The DETERRENT Act passed the House on March 27, 2025, with a bipartisan vote of 241-169.¹⁶⁵ DETERRENT previously passed the House in 2023 in a very similar bipartisan vote of 246-170.¹⁶⁶ DETERRENT's Senate companion was introduced on April 3, 2025, by Senator Thom Tillis (R-NC) and has more than 16 Senate cosponsors, including the Chairman of the Senate HELP Committee Senator Bill Cassidy (R-LA).¹⁶⁷

The DETERRENT Act would enact a host of Section 117 reforms, including provisions that would protect research-intensive institutions like Harvard from foreign influence. It also codifies the Department guidance about “affiliated entities” that should prevent loophole entities like Harvard Global from being utilized to avoid reporting of foreign gifts.

Specifically, the DETERRENT Act:

- Slashes the foreign gift reporting threshold for colleges and universities from \$250,000 to \$50,000, with an even stricter \$0 threshold for countries of concern (China, North Korea, Iran, Russia, as well as any country designated by the Secretary of Education, in consultation with the Secretary of Defense, Secretary of State, and the Director of National Intelligence to be engaged in conduct detrimental to the national security or foreign policy of the United States);
- Closes reporting loopholes and provides transparency to Congress, intelligence agencies, and the public;
- Requires disclosure of foreign gifts to individual staff and faculty at research-heavy institutions to protect those targeted the most by our adversaries;
- Holds our largest private institutions accountable for their financial partnerships by revealing concerning foreign investments in their endowments; and
- Implements a series of repercussions for colleges and universities that remain noncompliant in foreign gift reporting, such as fines and the loss of Title IV funding.

¹⁶⁴ The DETERRENT Act, H.R. 1048, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-bill/1048>.

¹⁶⁵ H.R. Roll Call No. 83, 119th Cong. (Mar. 27, 2025) (passage of H.R. 1048), <https://www.congress.gov/votes/house/119-1/83>.

¹⁶⁶ H.R. Roll No. 701, 118th Cong. (Dec. 6, 2023) (passage of H.R. 5933), <https://www.congress.gov/bill/118th-congress/house-bill/5933/all-actions?overview=closed#tabs>.

¹⁶⁷ The DETERRENT Act, H.R. 1048, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/senate-bill/1296/cosponsors>.

Congress Should Pass the Securing Innovation and Research from Adversaries (SIRA) Act.

The SIRA Act¹⁶⁸ introduced by Chairman Moolenaar (R-MI) would prohibit any individual, while participating in or performing work under a federally funded research award from entering into, supporting, or carrying out any research collaboration with any entity, or any individual associated with an entity, on a United States Government restricted entity list.

Harvard Should Centralize and Restructure its Research Security Functions and Efforts.

Harvard's decentralized, school-by-school approach to research security, compliance, and due diligence creates inconsistent standards, fragmented oversight, and uneven risk tolerance across the university. Consolidating these functions under a single centralized authority with institution-wide enforcement power would establish uniform standards, eliminate gaps between schools and departments, and ensure accountability across all federally funded research activities. A centralized office with mandatory pre-award and post-award review authority, combined with continuous monitoring of publications, foreign affiliations, outside engagements, and international collaborations, would significantly strengthen Harvard's ability to identify, assess, and mitigate research security risks before they escalate into systemic institutional failures.

Harvard should also move beyond a narrow, legal-compliance model and adopt a risk-based framework that explicitly incorporates U.S. national security considerations and treats legality as the floor, rather than the ceiling of its research security practices. For example, research security policies should prohibit engagement with entities designated under relevant U.S. national security lists or otherwise tied to foreign defense and intelligence ecosystems, including China's "Seven Sons of National Defense," regardless of whether such collaboration is technically permissible under existing law.

Harvard Should Overhaul its Due Diligence and Vetting Processes.

Harvard must overhaul its due diligence and vetting processes. Current practices, such as relying on exact-name matching for sanctions screening or failing to assess conference participants, are wholly inadequate. The university should implement robust, multilingual due diligence protocols capable of identifying transliteration variations, subsidiary relationships, and defense affiliations. This must extend beyond research projects to include conferences, executive education programs, visiting scholars, and any activity conducted under Harvard's name.

Additionally, Harvard should proactively prohibit any research relationship, collaboration, or engagement with entities listed on U.S. government restricted or

¹⁶⁸ Rep. John Moolenaar, Amendment to Rule Comm. Print 119-33, 119th Cong. (2026), https://amendments-rules.house.gov/amendments/research_ndaa_amdt_xml260618142144799.pdf.

sanctioned entity lists. These lists reflect formal determinations by the U.S. government that such entities pose risks to national security, foreign policy, or human rights. Continuing to engage with these entities, even where technically permissible under certain legal frameworks, demonstrates a failure of institutional judgment and risk management. A clear, enforceable prohibition would establish a baseline standard that aligns Harvard's research practices with U.S. national security interests and ensures that taxpayer-funded research is not knowingly exposed to entities already identified as threats by the U.S. government

Harvard Must Professionalize its Research Security Leadership and Staff.

Harvard must professionalize its research security leadership and staffing. Assigning individuals without relevant technical, export control, country-specific knowledge, or national security expertise to oversee dual-use risk is a structural failure. The university should be required to staff its research security office with qualified experts capable of assessing dual-use technologies, export control implications, and foreign military linkages. Without this expertise, any compliance program will remain performative rather than effective.

Harvard Must Eliminate Mechanisms that Could Circumvent Transparency Requirements.

Harvard must eliminate mechanisms that could enable circumvention of transparency requirements, including the use of affiliated entities such as Harvard Global to route foreign funding. All foreign funding and research relationships, regardless of the intermediary, should be subject to the same disclosure, review, and compliance standards.

ATTACHMENT A – HARVARD’S PRODUCED SPREADSHEET