

Guidance on NASA Prohibitions and Disclosures for University Researchers

Prohibitions on Collaboration with China

Since 2011, Federal appropriation laws have included restrictions which prohibit the National Aeronautics and Space Administration (NASA) from engaging in collaborative activities with China or China-owned companies or entities. When receiving NASA funding, the University is therefore restricted from collaborating with or issuing a subaward to China or any Chinese-owned company related to a NASA-funded project.

Specifically, “NASA is prohibited from funding any work that involves the bilateral participation, collaboration, or coordination with China or any Chinese-owned company or entity, whether funded or performed under a no exchange of funds arrangement. Proposals involving bilateral participation, collaboration, or coordination in any way with China or any Chinese-owned company, whether funded or performed under a no exchange of funds arrangement, may be ineligible for award.” ([PRC FAQ for ROSES](#))

In this context, “China or Chinese-owned Company” means: the People’s Republic of China (PRC), any company owned by the PRC, or any company incorporated under the laws of the PRC. Chinese universities and other similar institutions are considered to be incorporated under the laws of the PRC and, therefore, the funding restrictions apply to grants and cooperative agreements that include bilateral participation, collaboration, or coordination with Chinese universities.

This affects University researchers funded by NASA in several ways. For example:

- The University may not spend any NASA grant money on any part of a bilateral project with China, even if no funds are sent to China or to a Chinese-owned Company.
- Papers that include authors from only the U.S. and China are considered “bilateral activities” and are prohibited. Papers that include authors from other countries in addition to the U.S. and China are generally considered to be multilateral activities; thus, NASA funds may be used.
- Individuals affiliated with Chinese institutions are prohibited from participating in NASA-funded activities. This includes faculty, students, or scientists affiliated with Chinese institutions that are visiting the University.
- NASA-sponsored researchers are not allowed to enter into any agreement with Chinese organizations to obtain access to data. However, researchers may use data sourced from China that is publicly available.

Note: These laws do not restrict individual involvement based on citizenship or nationality. University students, postdoctoral fellows, or faculty that are Chinese citizens may work on NASA projects, but individuals with affiliations with Chinese institutions may not (including U.S. citizens).

Any exceptions to these requirements must be approved in advance by NASA. One example of a potential NASA exception relates to researcher access to lunar samples collected by China. NASA has previously [communicated](#) to researchers that they could apply for access to China’s Chang’e-5 lunar samples. Access to Chinese lunar samples is an evolving issue. Before applying to China for

sample access, researchers should discuss any necessary prior approvals with their program officer.

Disclosure Obligations

As part of its requirements that researchers disclose Current and Pending Support, NASA requires that Principal Investigations and Co- Principal Investigations list any Current and Pending Support (whether funded or unfunded) with China, including Chinese universities and other similar institutions or a Chinese-owned company, whether the support is held at the University, held at other institution or entity, or held individually. ([NASA Proposers Guide](#))

For questions regarding NASA China restrictions and Current and Pending Support, please contact your [ORPA Research Administrator](#).