Due Diligence Guidance for Sponsoring Supervisor

The following guidance is for faculty for performing due diligence on prospective international visitors. This was developed in consultation with the President’s Office of the University of Massachusetts after careful review of best practices for compliance with recent U.S. Department of State recommendations and regulations strengthening U.S. educational collaborations and maintaining academic and export control integrity.

We appreciate your interest in hosting an international Visiting Scholar (VS). Visiting scholars (students, professors, research scholars, and physicians) are invited, for a limited time-period, to campus for a specific academic or research purpose(s). UMass is responsible for selecting, screening, and monitoring visitors. The overwhelming majority of our visits are immensely successful. However, experience reveals that some such visitors may on occasion pose potential risks to your research data and future publications, including, but not limited to, issues with intellectual property, export controls, damage to reputation, financial risk, and cyber-security. Please remember that differing export controls can apply, depending on your research area and from where the person is visiting. (Any VS invited to work on projects that are export controlled must first be further vetted and approved by the campus Export Compliance Officer.)

We ask for your assistance in mitigating these risks by performing a few simple due diligence checks before a detailed invitation is offered to verify 1) the visitor is who s/he says s/he is; 2) the visitor is affiliated with an appropriate academic or research entity; and 3) that the visitor is well-suited and matched to your research pursuits and/or academic objectives.

During the review of your visitor, please bring any of the following issues to the attention of the International Students & Scholars Office (ISSO), as well as to the campus Export Compliance Officer:

1. Inconsistencies, gaps, misrepresentations, or omissions in the material you’ve reviewed;
2. Foreign military affiliations;
3. Mismatch between the visitor’s academic record and their purported reason for the visit; and
4. Any other issue or concern you may have regarding the visitor (e.g., fitness, character).

Below are some helpful suggestions that may be used to perform the checks. Complete these recommended checks before inviting any international visiting scholar (VS) to UMass. NOTE: An offer/hiring letter should ONLY be sent to the VS AFTER all internal approvals are completed and the letter is reviewed by the ISSO (and the campus Export Compliance Officer and HR office, if required by campus policy).

- Academic search engines (e.g., Googlescholar.com, Sciencedirect.com, Academic.microsoft.com, Scicentral.com, or Worldwidescience.org) are powerful tools. Such engines can be useful in efficiently performing due diligence.
- Verifying the visiting scholar’s identity. Look for inconsistencies or omissions across their CV, website(s), search results, and publications.
- Verifying the visiting scholar’s affiliations. Review the entities the visiting scholar is (and has been) affiliated with. Who was/is his/her employer? Does s/he have adjunct appointments?
Does s/he work (or have they previously worked) for a corporation, government, or military? Again, compare their CV, websites, search results, and publications for inconsistencies, omissions or gaps.

- Finally, review their academic record. Ask yourself is this person an appropriate match for my research program? Why did this visitor choose me? What assets does this person bring to the table? Do any inconsistencies, omissions or gaps exist between their CV, website(s), search results, and publications? Does their CV accurately represent their publications? Here are some hypothetical examples of potentially problematic visitors:

Visitor A: CV indicates publications on Doppler radar relating to weather research. However, search engine results indicate publications on utilizing Doppler radar for ballistics targeting.

Visitor B: CV indicates interest in studying gravitational orbits of planets. Search engine results indicate publications on space warfare.

Visitor C: CV indicates affiliation with University ABC. Search engine results indicate publications as adjunct faculty at foreign military academy.

Please direct questions about the diligence process or results to the campus Export Compliance Officer.