

THE SELECT COMMITTEE ON THE
STRATEGIC COMPETITION BETWEEN
THE UNITED STATES AND
THE CHINESE COMMUNIST PARTY
&
THE COMMITTEE ON EDUCATION AND
THE WORKFORCE

Joint Institutes, Divided Loyalties

How the Chinese Communist
Party Exploits U.S. University
Partnerships to Empower China's
Military and Repression



MAJORITY STAFF REPORT

SEPT. 2025

EXECUTIVE SUMMARY

Over the past two years, the Select Committee on the Chinese Communist Party and the Committee on Education and the Workforce's (Committees) investigations revealed how the Chinese Communist Party (CCP) exploits U.S. universities to fuel its military and technological rise.

Last fall, the Committees released *CCP on the Quad*, a report exposing how American researchers—many funded by the Department of Defense (DOD), Department of Energy, and National Science Foundation—enabled major advancements by the People's Republic of China (PRC) in nuclear technology, artificial intelligence, robotics, and quantum computing. The report also revealed that U.S.-PRC joint institutes facilitate technology transfer and pose national security risks.

This report provides **new findings on joint institutes and other problematic partnerships** between U.S. universities and the PRC, new information on stepped-up enforcement of foreign gift disclosure rules and university responses. This investigation:

1. Further highlights the risks these partnerships pose,
2. Exposes universities that continue to ignore the risks,
3. Identifies dozens of not-yet-reported academic collaborations that create risks to U.S. national security,
4. Examines changes in university disclosures of foreign funding, and
5. Reveals the impact of the Trump Administration's stepped-up enforcement of foreign gift reporting requirements.

Joint Institutes—entities based in China that pair American universities with Chinese institutions—are not typical academic collaborations that benefit students from both countries. They are under the thumb of the CCP. They operate under PRC law; are run by Chinese-majority boards and have Party presence in leadership; and are aligned with the CCP's national strategy, including its military buildup. Chinese government funding dominates these joint institutes, and the use of funds is restricted by law to align with CCP goals. Curriculum and research prioritize CCP-defined goals—especially in military-relevant science and technology fields. Finally, U.S. institutions agree to PRC-imposed limits on academic freedom, speech, and governance independence.

Since the time of the release of our report and our continued investigations, eight universities chose to do the right thing for academic freedom and U.S. national security by shuttering their joint institutes with Chinese partners. These include the University of California, Berkeley; Georgia Institute of Technology; University of Michigan; University of Pittsburgh; Oakland University; University of Detroit Mercy; Eastern Michigan University; and University of Illinois.

But many others have not. Last fall, the Committees identified high-risk joint institutes at the following universities, all of which have failed to act: **Duke University; University of Arizona; University of Delaware; Drake University; University of Houston; Kean University; University of Miami; New York University; University of North Alabama; Northeastern State University (Tahlequah); Portland State University; State University of New York - Stony Brook; and Trine University.**

* * *

These joint institutes are far from the only collaborations between U.S. universities and Chinese entities that create national security risks. In the follow-on investigation, the Committees identified more than a hundred additional academic partnerships that involve PRC entities that pose a national security risk.

More than fifty such partnerships are described below, along with the national security risk factors. These partnerships include:

- Three joint degree programs between U.S. universities and **China's Seven Sons of National Defense**. The Seven Sons of National Defense are universities hand-picked by the CCP to propel China's military and defense-research forward.
- A partnership in **submarine engineering research** between the University of Houston and **Dalian Maritime University**, which is supervised by a Chinese defense-focused government agency and partners with Chinese defense conglomerates on engineering research.
- A dual degree in **aircraft power engineering** between **Shenyang Aerospace University**, which is supervised by blacklisted Chinese military company the Aviation Industry Corporation of China (the developer of China's 5th Generation Stealth Fighter), and Southern Illinois University Carbondale.
- A joint program in **mechanical design, manufacturing, and automation** between **North China Institute of Aerospace Engineering**—a university controlled by blacklisted Chinese military companies that produce China's Long March Rockets and other missiles—and Saint Martin's University in Washington state.

These partnerships must end.

* * *

The second part of the report examines changes to foreign gift disclosures since the release of *CCP on the Quad*. After years of inaction by the Biden-Harris administration, the current Trump Administration has taken significant steps to bolster enforcement of the foreign contract and gift requirements in current law under section 117 of the *Higher Education Act* (HEA). Institutions that partner with joint institutes have taken some steps toward improved disclosures, but serious gaps still remain.

* * *

Select Committee Chairman John Moolenaar and Education and Workforce Chairman Tim Walberg therefore recommend adopting into law the *Securing American Funding and Expertise from Adversarial Research Exploitation Act of 2025 (SAFE Research Act)*, which:

- Prohibits federal science, technology, engineering, and mathematics (STEM) research funding to researchers who collaborate with foreign adversary-controlled entities that pose a national security risk.
- Prohibits DOD funding to universities that partner with foreign adversary-controlled entities that pose a national security risk.
- Requires enhanced disclosures of foreign adversary collaborations, travel, and affiliations from foreign adversary entities.

The *SAFE Research Act* was introduced and adopted by the House as an amendment to the Fiscal Year 2026 National Defense Authorization Act (FY26 NDAA), which passed the House on September 10, 2025. We look forward to working expeditiously to move this bill forward and enact it into law.

In addition, foreign gift disclosures remain inadequate. The lack of strong enforcement provisions in the law and shortcomings in university reporting still remain and demonstrate the continued need for legislative action such as H.R. 1048, the *Defending Education Transparency and Ending Rogue Regimes Engaging in Nefarious Transactions* (DETERRENT) Act. The DETERRENT Act passed the House on March 27, 2025, by a vote of 241 to 169. It is now awaiting Senate action. The Chairmen continue to urge the Senate to pass the DETERRENT Act expeditiously.

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PART I: ACADEMIC PARTNERSHIPS ADVANCE THE CCP'S TECHNOLOGICAL AND MILITARY GOALS

BACKGROUND

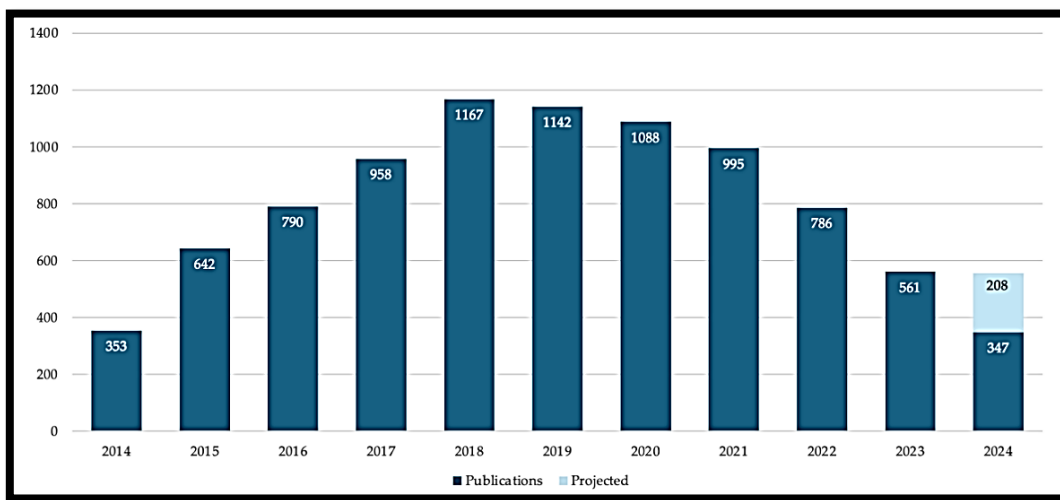
Over the past two years, the Committees investigated the CCP's exploitation of U.S. research institutions to fuel its military and technological rise, analyzing thousands of academic and government records, conducting extensive open-source research, and engaging directly with universities across the country.

Last fall, the Committees published a joint report, *CCP on the Quad: How American Taxpayers and Universities Fund the CCP's Advanced Military and Technological Research*,¹ revealing how taxpayer-funded research fuels China's military ambitions through individual research collaborations and university-level partnerships with individuals and institutions in China.

Individual Research Partnerships: American researchers—many backed by the Department of Defense, Department of Energy, and National Science Foundation—enabled major PRC advancements in nuclear technology, artificial intelligence, robotics, and quantum computing.²

This practice is troublingly widespread: over 8,800 USG-funded research papers had PRC coauthors—and thousands were directly tied to China's defense industrial base.³ DOD funds research for the purpose of achieving technological breakthroughs to equip future warfighters—in other words, all DOD-funded projects are potentially dual-use.

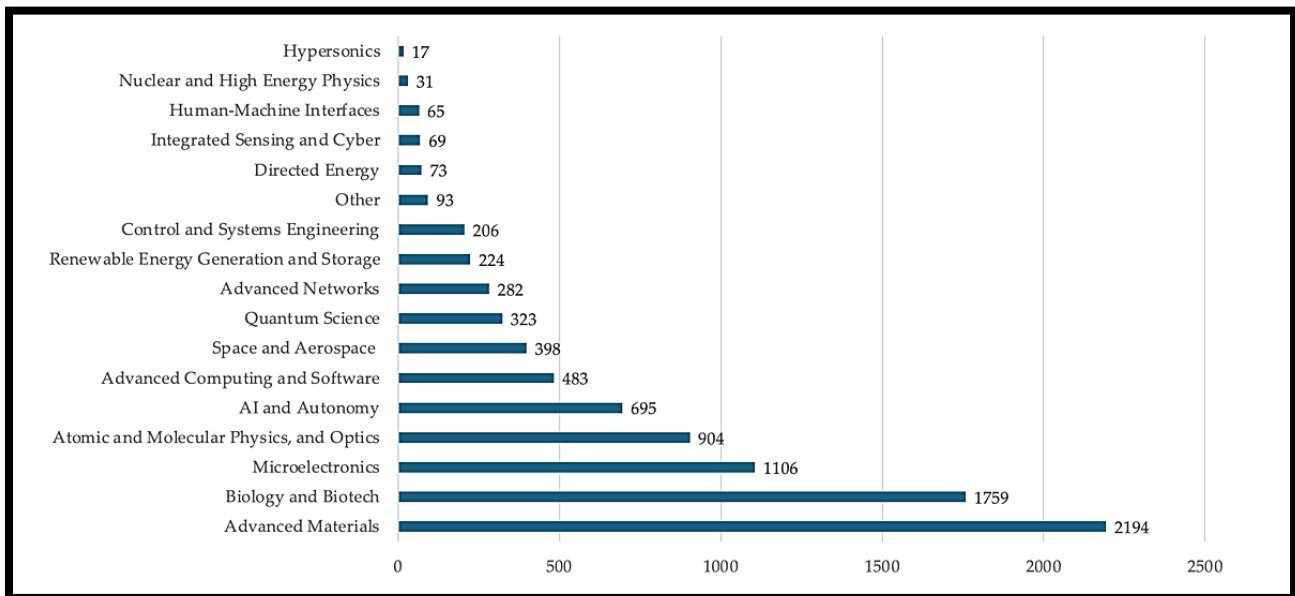
Figure 1 - Taxpayers Funded Thousands of Potential Dual-Use Research Publications Coauthored with PRC-Based Individuals



These collaborations spanned AI, microelectronics, advanced materials, space and aerospace, and military-use technologies like hypersonics, nuclear physics, and directed energy. The vast majority of these DOD-funded publications are collaborations on advanced research related to dual-use, critical, and emerging technologies.⁴

Some of this research has direct military applications – such as high-performance explosives, tracking of targets, and drone operation networks – that China’s People’s Liberation Army (PLA) would use against the U.S. military in the event of a conflict.⁵

Figure 2 - DOD-Funded PRC-Coauthored Papers Advanced China’s Knowledge of Strategic Technologies (2014-2024)



That data is a wake-up call—confirming the scale, depth, and U.S. national security implications of U.S.-PRC academic engagement.

Joint Institutes: U.S.-PRC joint institutes are entities based in China that pair American universities with PRC institutions and serve as key technology transfer points. These joint institutes operate under PRC law, are run by Chinese-majority boards, and are aligned with the CCP’s national strategy, including its military buildup.⁶

Further Investigation: Following the release of *CCP on the Quad*, the Committees continued to examine university-level partnerships. We opened individual investigations into eight of the partnerships exposed in *CCP on the Quad* and identified hundreds of additional partnerships that may pose a U.S. national security risk.

These efforts revealed that:

1. Joint institutes advance China’s technological and military goals.
2. While some leading U.S. universities have shuttered their joint institutes with Chinese universities, many others have doubled down on risky partnerships with China.
3. There are dozens of additional university-level partnerships between American and Chinese universities that create risk to U.S. national security.

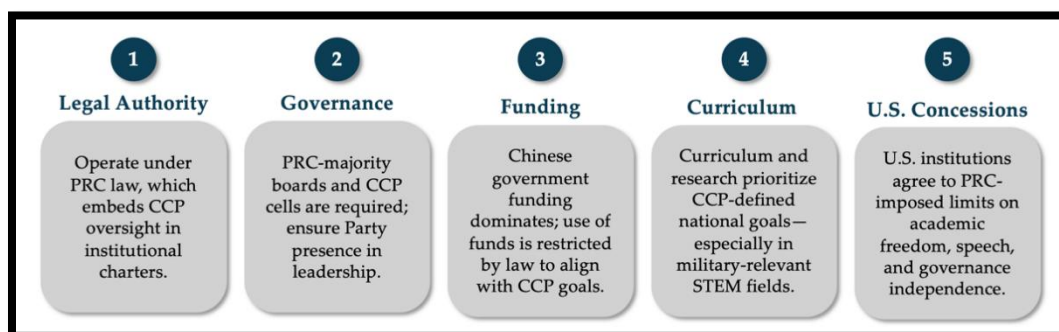
This report presents the key findings from that follow-on effort.

FINDINGS

Finding 1 - Joint Institutes Advance China’s Technological and Military Goals.

Joint institutes’ financial model sustains access to U.S. universities—and hides the risk. These programs are heavily dependent on PRC financing to keep the programs alive. The PRC doesn’t just benefit from these partnerships—it bankrolls them, often on terms that constrain academic freedom⁷ and conceal who actually controls the agenda. As just one example, Georgia Institute of Technology’s partnership with Tianjin University, Georgia Tech Shenzhen Institute (GTSI), received over \$8.5 million in startup funding, with Georgia Tech contributing just \$28,000. Similarly, University of California, Berkeley’s partnership with Tsinghua University, Tsinghua–Berkeley Shenzhen Institute (TBSI), had secured more than \$220 million from the Shenzhen government as of 2018.⁸ These aren’t neutral academic exchanges—they are state-subsidized platforms engineered to absorb U.S. technical knowledge, often in fields directly relevant to military modernization.⁹

Figure 3 - How the PRC Exercises Control Over Joint Institutes



Yet despite the scale of these transactions, oversight has been virtually nonexistent. Universities are legally required to disclose foreign gifts and contracts

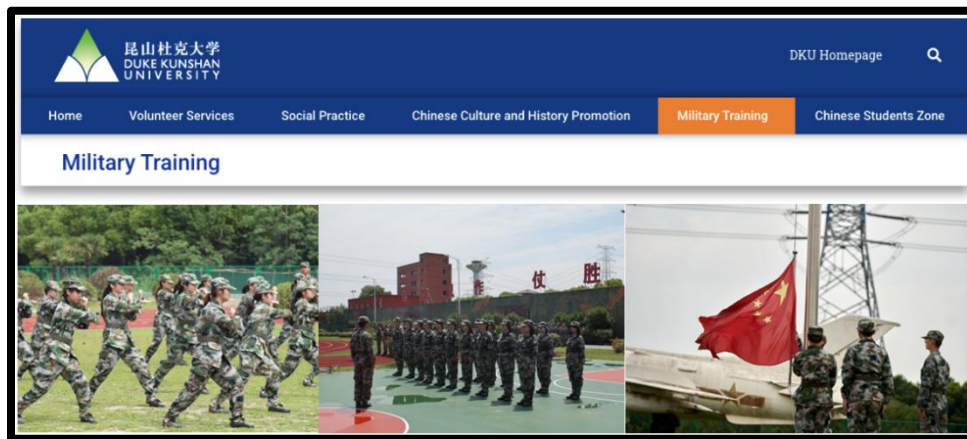
of \$250,000 or more under section 117 of the Higher Education Act—but many do not.¹⁰ And the Biden-Harris Department of Education did not open a single enforcement action in four years.¹¹ Enforcement failure enables high-risk partnerships to operate in the dark.

Universities frame the influx of foreign funds as a win—budget relief, prestige, global engagement. In reality, the financial model rewards opacity, sustains systemic access by foreign adversaries to U.S. expertise, and leaves the strategic advantage in Beijing’s hands.

The overseas structure magnifies exposure—even when U.S. presence is minimal. Universities often downplay the U.S. national security threat posed by joint institutes and other academic partnerships by citing low numbers of Chinese students on their U.S. campuses. But that misses the point. Most joint institutes operate primarily in China, not the United States.¹² They deliver U.S.-branded programs to large cohorts of Chinese students, often in defense-relevant fields, under PRC law and in PRC-run facilities—without meaningful U.S. oversight.

These structures are not neutral. They integrate ideological education, military-linked research, and U.S. academic resources. For example, at Duke Kunshan University, incoming joint institute students in China have participated in military-style drills and CCP-led ideological training.¹³ Another example is the Shanghai Jiao Tong–University of Michigan Joint Institute (STJU-UM),¹⁴ where students have been enrolled in mandatory political coursework, some of which is designed to align with PLA training goals.¹⁵

Figure 4 – Joint Institutes as PLA Training Grounds



Images from Duke Kunshan University’s official “Military Training” page show students undergoing PLA drills, saluting the CCP flag, and marching in formations modeled on Chinese military training—revealing the Joint Institute’s role in indoctrinating youth and preparing them to fight future wars—including against Americans.¹⁶

Figure 5 – Joint Institutes as Platforms for Military-Civil Fusion



At Shanghai Jiao Tong University's UM-SJTU Joint Institute, students undergo mandatory military training (left),¹⁷ while faculty visit the China Academy of Launch Vehicle Technology (right)¹⁸—a key PLA contractor—demonstrating how Joint Institutes advance the CCP's military-civil fusion agenda by linking U.S. academic programs to China's strategic weapons development.

The downstream risks are real. In one high-profile case, five PRC nationals affiliated with the SJTU–UM Joint Institute or Shanghai Jiao Tong University were charged with using drones to surveil *Camp Grayling*, an important U.S. military training site in Michigan.¹⁹ The incident highlights how even “instructional” partnerships based on foreign soil can facilitate access for surveillance and intelligence purposes.

Finding 2 - Some Leading U.S. Universities Have Shuttered Joint Institutes, But Others Doubled Down on Risky Collaboration with China.

During the investigation and after the release of *CCP on the Quad*, the Committees issued formal oversight letters to a subset of these programs. We identified a subset of 21 of the highest-risk joint institutes out of the thousands in operation, and we launched direct inquiries into nine.

Following our investigations, eight of those nine shut down.

Table 1 – Shuttered Joint Institutes

U.S. University	Shuttered Joint Institute
✓ U.C. Berkeley	✗ Tsinghua–Berkeley Shenzhen Inst.
✓ Georgia Tech	✗ Georgia Tech Shenzhen Inst.
✓ U. of Michigan	✗ SJTU–UM Joint Inst.
✓ U. of Pittsburgh	✗ Sichuan University–Pittsburgh Inst.
✓ Oakland U.	✗ ZZULI–OU Intelligent Engineering Joint Inst.
✓ U. of Detroit Mercy	✗ Detroit Green Technology Inst.
✓ Eastern Michigan U.	✗ Eastern Michigan Joint College of Engineering
✓ U. of Illinois	✗ ZJU–UIUC Inst.

Faced with the facts, these universities closed their Joint Institutes and chose academic freedom and U.S. national security over profit.

But not all have. The Committees maintain an open investigation into the ninth, Duke University’s disturbing partnership with Wuhan University, the Duke Kunshan University. As we wrote in our letter to Duke, that institute:

[S]pecializes in high-technology fields with direct military applications, including data science, artificial intelligence, and materials science. As part of these programs, many [institute] students spend time at Duke University, gaining access to federally funded U.S. research. Given the Chinese Communist Party’s (CCP) well-documented efforts to exploit academic openness, this partnership **creates a direct pipeline between U.S. innovation and China’s military-industrial complex.**²⁰

And many other U.S. universities have remained silent, collecting millions from Chinese students while helping Beijing advance its military and technological goals. The arrangement is perverse: American taxpayers fund research that strengthens our foremost adversary. For example, the following high-risk joint institutes identified in our September 2024 report appear to still be in operation.

Table 2 – High-Risk and Previously-Identified, Open Joint Institutes²¹

U.S. University	Joint Institute Still Operating
Duke U.	Duke Kunshan U. (<i>under Committee investigation</i>)
U. Arizona	Arizona College of Technology at Hebei U. of Technology
U. Delaware	SWUFE-UD Inst. of Data Science
Drake U.	QU-Drake United College, Qingdao
U. Houston	Houston International Inst.
Kean U.	U. Wenzhou-Kean U.
U. Miami	Miami College of Henan U.
New York U.	Shanghai New York U.
U. North Alabama	North Alabama International College of Engineering & Technology, Guizhou U.
Northeastern State U. (Tahlequah)	GCTB-NSU Joint Inst. of Tech, Guangzhou College of Technology & Business
Portland State U.	Portland Inst., Nanjing U. of Posts & Telecom.
SUNY – Stony Brook	Stony Brook Institute at Anhui U.
Trine U.	Trine Engineering Inst., Shaanxi U. of Tech

Even a brief review of publicly available sources reveals that the partnerships that remain are also replete with U.S. national security risks. For example:

- New York University hosts a joint physics institute with **East China Normal University** at NYU Shanghai.^{22 a}
 - East China Normal hosts a State Key Laboratory of Precision Spectroscopy that partners with a defense lab and the blacklisted China Aerospace Science and Technology Corporation.²³
 - At least one NYU professor at the joint institute received over one million yuan from China’s Thousand Talents Program to support

^a The institute confers NYU undergraduate and graduate degrees in high-tech fields including computer science, data science, neuroscience, physics, chemistry, and electronic engineering. NYU Shanghai is a legally independent Sino-foreign joint venture established by ECNU and NYU, enrolling over 2,000 students. *See* note 22.

quantum computing research,²⁴ which directly advanced work at the Chinese university's precision spectroscopy lab.²⁵

- University of Houston runs a joint engineering institute with **Dalian Maritime University**, the Houston International Institute.^b ²⁶
 - Dalian Maritime is overseen by a PRC defense agency.²⁷ The university collaborates with defense-linked entities such as the Dalian Naval Academy²⁸ and a PRC defense research center,^c ²⁹ and it has conducted research funded by the Ministry of State Security and the Central Military Commission.³⁰

Finding 3 – Dozens of Additional U.S.-China University Collaborations Pose a National Security Risk.

These ventures are far from the only collaborations that pose a U.S. national security risk. We have identified dozens of additional American universities hosting high-risk partnerships with PRC entities, including both joint institutes and joint degree programs under Beijing's "Chinese-foreign cooperative education" system.³¹ We reviewed open-source information on partnerships between U.S. universities and entities in China and identified nearly 150 partnerships with entities that are linked to China's military and defense industrial base. A sample of those partnerships and risk factors are identified below.

These instructional partnerships also create national security risks. Instructional programs—when delivered at scale—grant sustained access to U.S. expertise, content, and institutional resources. These programs operate under PRC law, prioritize Chinese students, and often leverage the brand and technical strength of federally funded U.S. universities.³²

The concern is not just the subjects that are taught through these programs—but where the expertise is coming from. These programs are often embedded in universities singled out by the U.S. government for their technical leadership—including both large, top-tier research institutes and smaller institutions that host federally-recognized research programs. For example, Georgia Tech hosts a University Affiliated Research Center supporting the Department of Defense.³³ U.C. Berkeley is tied to a Department of Energy national

^b The Institute enrolls 1,200 students and offers University of Houston-awarded undergraduate degrees in mechanical, civil, and electrical engineering. *See* note 26.

^c Specifically, the 701 Research Institute of the blacklisted China Shipbuilding Industry Corporation, which conducts military research for the PLA and is the PLA Navy's largest supplier of weapons platforms. *See* note 29.

lab. Detroit Mercy, Oakland University, and Eastern Michigan University carry designations in cybersecurity from the U.S. National Security Agency.³⁴

These federal credentials exist because of specific strengths—in fields like nanotech, advanced computing, and defense systems—the very areas the PRC is working to dominate. All five of these American universities previously hosted Joint Institutes, which they shut down after the Committees exposed the national security risks. It is no surprise Beijing targeted these institutions and others like them as it seeks structured, long-term access to the expertise China needs.

The ongoing partnerships identified in Table 3 create similar risks. These partnerships include:

- Three joint degree programs between U.S. universities and China's **Seven Sons of National Defense**^d universities:
 - **Harbin Inst. of Technology** + University of Arizona³⁵
 - **Beijing Inst. of Technology** + Bryant University³⁶
 - **Beijing Inst. of Technology** + Utah State University³⁷
- A partnership³⁸ focused on **submarine engineering research** between the University of Houston and **Dalian Maritime University**.
 - As noted above, Dalian Maritime University **partners with Chinese defense conglomerates on defense and maritime related research**; and has been implicated in espionage.^{39 40}
- A dual-degree program in **aircraft power engineering** between **Shenyang Aerospace University**⁴¹ and Southern Illinois University Carbondale.
 - Shenyang is supervised by the blacklisted Chinese military company the Aviation Industry Corporation of China, the developer of China's 5th Generation Stealth Fighter, and it focuses on defense research, hosting multiple defense research labs.⁴²
- A joint program in **mechanical design, manufacturing, and automation** between **North China Institute of Aerospace Engineering**⁴³ and Saint Martin's University.
 - North China Institute is supervised in part by China's defense conglomerates China Aerospace Science and Technology Corporation (CASC) and China Aerospace Science and Industry Corporation (CASIC), which produce China's Long March Rockets and other missiles and satellites for the PLA.⁴⁴

^d The Seven Sons of National Defense are universities hand-picked by the CCP to propel China's military and defense-research forward. See Australian Strategic Policy Institute (ASPI), *The China Defence Universities Tracker* (Nov. 25, 2019), <https://www.aspi.org.au/report/china-defence-universities-tracker/>.

Table 3 below includes detailed risk analysis on more than fifty partnerships that pose serious national security risks.⁴⁵ We believe that more such partnerships exist.

These partnerships must end.

Table 3 - High-Risk Joint Institutes & Dual -Degree Programs^e

Key

Defense University	Defense Oversight	Defense Entities	Defense Programs	Defense Research	Military End User	
Seven Sons of National Defense U. or a former “Ministry of Ordnance Industry” ⁴⁶ university.	Jointly administered by SASTIND ⁴⁷ or a state-owned defense and weapons conglomerate.	Hosts high-risk defense entities (e.g., national defense and state key labs or defense-focused R&D centers). ⁴⁸	Hosts high-risk programs (e.g., disciplines with “national defense” characteristics). ⁴⁹	Licensed to conduct classified defense research or hosts high-risk defense infrastructure (e.g., super computers). ⁵⁰	Linked to military or intelligence end use or espionage or partners with Chinese military or defense conglomerate(s).	
	Defense University	Defense Oversight	Defense Entities	Defense Programs	Defense Research	MEU
Harbin Institute of Technology ⁵¹ University of Arizona <i>Joint Master’s in Management Information Systems</i> ⁵²		✓	✓	✓	✓	✓
Beijing Institute of Technology ⁵³ Bryant University <i>Joint Undergraduate in Accounting</i> ⁵⁴		✓	✓	✓	✓	✓
Beijing Institute of Technology ⁵⁵ Utah State University <i>Joint Undergraduate in Int’l Economics</i> ⁵⁶		✓	✓	✓	✓	✓
Chongqing University of Posts and Telecommunications ⁵⁷ Northern Arizona University <i>Joint Undergraduate in Electronic Information Engineering</i> ⁵⁸		✓	✓	✓	✓	✓
Chongqing University of Posts and Telecommunications ⁵⁹ SUNY – Albany <i>Joint Undergraduate in Software Engineering</i> ⁶⁰		✓	✓	✓	✓	✓
Changchun University of Science and Technology ⁶¹ Delaware State University <i>Joint Undergraduate in Optoelectronic Information Science and Engineering</i> ⁶²		✓	✓	✓	✓	✓
Kunshan Duke University ⁶³ Duke University Wuhan University ⁶⁴			✓	✓	✓	✓
University of Electronic Science and Technology of China ⁶⁵ Webster University <i>Joint MBA</i> ⁶⁶			✓	✓	✓	✓
Nanchang Hangkong University ⁶⁷ University of Northern Iowa			✓	✓	✓	✓

^e Key for the righthand column:

Joint Institute or PRC University Host of Joint Program

U.S. University Partner

PRC University Partner (if applicable)

Title of Joint Degree (if applicable)

<i>Joint Undergraduate in Electronic Information Engineering</i>					
Xi'an University of Electronic Science and Technology ⁶⁸ Virginia Tech <i>Joint Undergraduate in Big Data Management and Applications</i> ⁶⁹	✓	✓	✓	✓	✓
Shenyang Aerospace University ⁷⁰ Southern Illinois University Carbondale <i>Joint Undergraduate in Aircraft Power Engineering</i> ⁷¹	✓	✓	✓	✓	✓
Xi'an Jiaotong University ⁷² University of Texas at Arlington <i>Joint Executive MBA</i> ⁷³	✓	✓	✓	✓	✓
Sun Yat-sen University ⁷⁴ University of Minnesota <i>Joint Executive MBA</i> ⁷⁵	✓	✓	✓	✓	✓
Tsinghua University ⁷⁶ Temple University <i>Joint Masters in Law</i> ⁷⁷	✓	✓	✓	✓	✓
Tsinghua University ⁷⁸ Johns Hopkins University <i>Joint Doctorate in Public Health</i> ⁷⁹	✓	✓	✓	✓	✓
Heilongjiang Institute of Technology ⁸⁰ Western Illinois University <i>Joint Program in Geographic Information Science</i> ⁸¹	✓	✓	✓	✓	✓
Soochow University - School of Applied Technology ⁸² California State San Bernardino <i>Joint Program in Internet of Things Engineering</i> ⁸³	✓	✓	✓	✓	✓
Lanzhou University ⁸⁴ Drexel University <i>Joint Program in Computer Science and Technology</i> ⁸⁵	✓	✓	✓	✓	✓
North China Institute of Aerospace Engineering ⁸⁶ Saint Martin's University <i>Joint Program in Mechanical Design, Manufacturing and Automation</i> ⁸⁷	✓	✓	✓	✓	✓
Dalian University of Technology ⁸⁸ U.C. Irvine <i>Joint Program in Mechanical Design, Manufacturing and Automation</i> ⁸⁹	✓	✓	✓	✓	✓
Southwest University of Science and Technology ⁹⁰ Tennessee State University <i>Joint Program in Civil Engineering</i> ⁹¹	✓	✓	✓	✓	✓
Chongqing University ⁹² University of Cincinnati <i>Joint Program in Mechanical Design, Manufacturing and Automation</i> ⁹³	✓	✓	✓	✓	✓
Chongqing University ⁹⁴ University of Cincinnati <i>Joint Program in Electrical Engineering and Automation</i> ⁹⁵	✓	✓	✓	✓	✓
Soochow University - School of Applied Technology ⁹⁶ California State Northridge <i>Joint Program in Engineering</i> ⁹⁷	✓	✓	✓	✓	✓
University of Shanghai for Science and Technology ⁹⁸ Queens College, CUNY <i>Joint Program in English</i> ⁹⁹	✓	✓	✓	✓	✓
Soochow University ¹⁰⁰ University of Arkansas <i>Joint Program in Logistics Management</i> ¹⁰¹	✓	✓	✓	✓	✓

University of Shanghai for Science and Technology¹⁰² University of North Dakota <i>Joint Program in Business Administration¹⁰³</i>	✓	✓	✓	✓	✓
Houston International Institute¹⁰⁴ University of Houston Dalian Maritime University ¹⁰⁵	✓	✓	✓	✓	✓
Central South University¹⁰⁶ U.C. San Francisco <i>Joint Masters in Nursing¹⁰⁷</i>	✓	✓	✓	✓	✓
Hebei University¹⁰⁸ University of New Orleans <i>Joint Masters in Nursing¹⁰⁹</i>	✓	✓	✓	✓	
Shijiazhuang Tiedao University¹¹⁰ Florida Institute of Technology <i>Joint Program in Mechanical Design, Manufacturing and Automation¹¹¹</i>	✓	✓	✓	✓	✓
Henan University of Science and Technology¹¹² Idaho State University <i>Joint Program in Mechatronic Engineering¹¹³</i>	✓	✓	✓	✓	✓
<u>Stony Brook Institute¹¹⁴</u> Suny Stony Brook Anhui University ¹¹⁵	✓	✓	✓	✓	✓
<u>Arizona College of Technology¹¹⁶</u> University of Arizona Hebei University of Technology ¹¹⁷	✓	✓	✓	✓	✓
Tianjin Polytechnic University¹¹⁸ Bowling Green State University <i>Joint Program in Information Management and Info Systems¹¹⁹</i>	✓	✓	✓	✓	✓
Beijing University of Chemical Technology¹²⁰ University of Detroit Mercy <i>Joint Program in Mechanical Design, Manufacturing and Automation¹²¹</i>	✓	✓	✓	✓	
Beijing University of Chemical Technology¹²² SUNY-ESF <i>Joint Program in Bioengineering¹²³</i>	✓	✓	✓	✓	
Beijing University of Chemical Technology¹²⁴ University of Georgia <i>Joint Master's in Bioengineering¹²⁵</i>	✓	✓	✓	✓	
<u>Shanghai New York University¹²⁶</u> New York University East China Normal University ¹²⁷		✓	✓	✓	✓
<u>Miami College¹²⁸</u> University of Miami Henan University ¹²⁹	✓		✓	✓	✓
Hefei University of Technology¹³⁰ Clark University <i>Joint Masters in Nursing¹³¹</i>	✓		✓	✓	✓
Guilin University of Electronic Technology¹³² University of Arkansas at Little Rock <i>Joint Program in Electronic Information Engineering¹³³</i>	✓		✓	✓	
<u>Portland Institute¹³⁴</u> Portland State University Nanjing University of Posts & Telecoms ¹³⁵	✓		✓	✓	
Kunming University of Science and Technology¹³⁶ University of Idaho <i>Joint Program in Civil Engineering¹³⁷</i>	✓		✓		✓
Kunming University of Science and Technology¹³⁸ University of Arkansas (Fayetteville)	✓		✓		✓

<i>Joint Program in Logistics Engineering</i> ¹³⁹			
<u>Wenzhou-Kean University</u> ¹⁴⁰			
Kean University	✓	✓	✓
Wenzhou University ¹⁴¹			
<u>SWUFE-UD Institute of Data Science</u> ¹⁴²			
University of Delaware		✓	✓
Southwestern University of Finance and Economics ¹⁴³			
<u>OU-Drake United College</u> ¹⁴⁴			
Drake University	✓	✓	
Qingdao University of Science and Technology ¹⁴⁵			
<u>North Alabama Int'l College of Engineering and Technology</u> ¹⁴⁶			
University of North Alabama	✓	✓	
Guizhou University ¹⁴⁷			

WHAT IS NOW UNFOLDING

Joint institutes offer the PRC sustained, structured access to U.S. expertise—but they are only one piece of a broader system Beijing uses to infiltrate American research institutions. Over the past decade, the PRC has gained footholds through a range of legal and quasi-legal channels, including talent recruitment programs, defense research collaboration, and foreign scholarship schemes. More than 8,800 DOD-funded research papers have included PRC coauthors—many directly tied to China’s defense research base.

But the Select Committee’s recent oversight work has shown that joint institutes were only one component of a broader system. In recent months, the Select Committee has launched new investigations into PRC-linked scholarship programs and the exploitation of student visa pathways.¹⁴⁸ What once came through Confucius Institutes now flows through new channels—less visible but no less strategic.

The Select Committee is now actively investigating these additional CCP activities—including the China Scholarship Counsel and student visa pathways—which, combined with joint institutes, illustrate a coordinated strategy by the CCP: leverage American institutions to train PRC talent, absorb U.S. research, and convert that knowledge into military and economic advantage. Joint institutes are just one vector—the problem is systemic.

PART II: FOREIGN FUNDING REPORTING REQUIREMENTS

BACKGROUND

Trump Administration Actions

As noted in *CCP on the Quad*,¹⁴⁹ section 117 of the HEA requires institutions of higher education (IHEs) that receive federal financial assistance to disclose semiannually to the U.S. Department of Education (ED or Department) any gifts from, or contracts with, a foreign source that alone, or in the aggregate, are valued at \$250,000 or more in a calendar year.¹⁵⁰

Enforcement of section 117 was strong during the first Trump Administration but then non-existent under the Biden-Harris Administration. During the first Trump Administration, the Department opened section 117 investigations on 19 campuses from 2019-2021, which led universities to report \$6.5 billion in previously undisclosed foreign funds.¹⁵¹ In contrast, the Biden-Harris Administration took no new enforcement actions under section 117.¹⁵² This failure to enforce the law resulted in foreign funds infiltrating our country undetected and underreported, allowing malignant foreign entities, like the CCP, to take root at colleges and universities. In September 2024, the National Association of Scholars compared data reported under section 117 to reportable amounts of foreign funds disclosed under FOIA requests. They found that a staggering 39 percent of such foreign funds were not disclosed under the Biden-Harris Administration, representing a regression from the reporting under the Trump Administration.¹⁵³

FINDINGS

Disclosures of Foreign Funding for Joint Institutes

Delayed, inaccurate, or absent reporting under section 117 violates current law. As noted in *CCP on the Quad*, UC Berkeley and Georgia Tech failed to properly comply with section 117 requirements when reporting funds received through their joint institutes.¹⁵⁴ Given the similarities in authority and funding structure between UC Berkeley and Georgia Tech, it would not be surprising to see other joint institutes mimic such structure. Because of both the significant national security threat and the existing section 117 law, institutions with joint institutes must ensure they are submitting accurate data under section 117.

Finding 4 - Many Universities are Failing to Disclose their Joint Institute Agreements, Violating U.S. Law.

The Department's section 117 data is published bi-annually, with the most recent data released on February 28, 2025.¹⁵⁵ The Department also publishes data as old as September 23, 2020, allowing for past comparison of previously reported

gifts.¹⁵⁶ Proper section 117 compliance from institutions with joint institutes, according to the Education and Workforce Committee’s analysis of recent Department data, seems to be a mixed bag.¹⁵⁷

For example, the University of North Alabama and Northeastern State University (Tahlequah) have still not reported a single gift or contract with China despite maintaining joint institute agreements.¹⁵⁸ In section 117 data published in February 2025, Trine University reported four contracts with China.¹⁵⁹ However, all four contracts were absent in section 117 data published October 15, 2024, despite all of the contracts beginning before May 2024. In fact, two of the contracts in question began in 2021 and 2022, respectively.¹⁶⁰ Department guidelines are clear that contracts should be reported when the contract is entered, not completed.¹⁶¹ The delayed reporting of these contracts seem to indicate Trine University’s failure to report such contracts in a timely manner.

In contrast, some universities are demonstrating positive approaches. Drake University disclosed its contract with Qingdao University and included a note describing the joint institute revenue structure.¹⁶² The University of Illinois at Urbana-Champaign also added descriptions to its section 117 disclosures regarding its joint institute with Zhejiang University.¹⁶³ These are small yet important steps towards proper compliance and transparency.

In total, the 14 universities that continue to maintain joint institutes have reported receiving roughly \$680 million in gifts and contracts from sources in China.¹⁶⁴ While this total includes past gifts and contracts that may have no direct relation to the creation of joint institutes, it still points to the concerning amount of funding involved in partnerships with Chinese sources that may impact U.S. national security. Given the historical trend of underreporting under section 117, especially considering the examples of institutions failing to properly disclose funding received from joint institutes, the \$680 million may just be the tip of the iceberg.

WHAT IS NOW UNFOLDING

The second Trump Administration has not only resumed enforcement of section 117 but also strengthened it. In fact, the Trump Administration opened new compliance reviews into four universities: Harvard, UC Berkeley, University of Pennsylvania (UPenn), and the University of Michigan.

The Trump Administration has thus far: (1) issued Executive Order 14282 (EO 14282), titled “Transparency Regarding Foreign Influence at American Universities;”¹⁶⁵ (2) transferred section 117 enforcement actions from the Office of Federal Student Aid (FSA) back to the Office of General Counsel (OGC), making clear its enforcement prioritization;¹⁶⁶ (3) initiated a records request with Harvard after discovering inaccurate foreign financial disclosures;¹⁶⁷ (4) opened an investigation and initiated a records request with UC Berkeley after a review of

UC Berkeley's foreign funding disclosures revealed the disclosures may be incomplete or inaccurate;¹⁶⁸ (5) opened an investigation into UPenn after a similar review of the university's foreign reports revealed inaccurate and incomplete data;¹⁶⁹ and (6) opened an investigation into the University of Michigan, in part spurred by multiple examples of Chinese nationals attempting to smuggle hazardous material through university facilities.¹⁷⁰

Improvements to Enforcement Structure

The second Trump Administration has improved the enforcement structure of section 117. EO 14282, published on April 28, 2025, instructs the Secretary of Education (Secretary) to "take appropriate steps to reverse or rescind any actions by the prior administration that permit higher education institutions to maintain improper secrecy regarding their foreign funding," "take appropriate steps to require universities to more specifically disclose details about foreign funding, including the true source and purpose of the funds," "provide the American people with greater access to information about foreign funding to higher education institutions," and directs the Secretary and Attorney General to "hold accountable higher education institutions that fail to comply with the law concerning disclosures of foreign funding."¹⁷¹ Significantly, section 3 of EO 14282 requires the heads of executive branch departments and agencies to take appropriate action "to prospectively ensure that certification of compliance by higher education institutions with [section 117 of the HEA] is material for purposes of [the *False Claims Act*] and for receipt of appropriate federal grant funds, which shall not be provided in cases of noncompliance with [section 117 of the HEA] and any other applicable foreign funding disclosure requirements."¹⁷² Tying section 117 to *False Claims Act* liability is likely to draw significantly greater scrutiny of disclosure obligations than in the past by the higher education community.

Additionally, as mentioned above, the Biden-Harris Administration shifted section 117 enforcement responsibilities from OGC to FSA.¹⁷³ FSA, otherwise tasked with administering federal student aid programs, was ill-equipped to enforce section 117 and failed to enforce the law. Accordingly, in April of this year, Secretary Linda McMahon directed OGC to resume enforcement functions, and it has done so.¹⁷⁴

The Trump Administration has continued to correctly emphasize the importance of strengthening interagency coordination. During the first term, the Trump Administration issued National Security Presidential Memorandum (NSPM)-33 to take an important step towards standardizing disclosure requirements and improving communication between agencies, including the DOD and ED.¹⁷⁵ Last month the Office of the Director of National Intelligence's National Counterintelligence and Security Center issued a new bulletin titled *Safeguarding Academia*. The bulletin was published in partnership with multiple

agencies, including ED, and continues the Trump Administration's strong track record of properly prioritizing combatting research threats at institutions of higher education.¹⁷⁶

University Investigations

In addition to improving the enforcement structure, the Trump Administration has resumed officially launching investigations to ensure proper compliance. In the first nine months, the Trump Administration has launched four new compliance reviews, a drastic increase from the Biden-Harris Administration's four-year total of zero.

The Department announced on April 18 a transmittal of records request to Harvard after a review of the university's section 117 disclosures revealed incomplete and inaccurate disclosures.¹⁷⁷ The request letter to Harvard noted that "incomplete and inaccurate disclosures have once again been provided to the Department by Harvard (including non-compliant transaction disclosures and the submission of anonymous donors, among other deficiencies), in possible violation of Harvard's December 2024 agreement with the Department."¹⁷⁸

Later in April, the Department initiated a notice of investigation and records request with UC Berkeley after a review of the school's section 117 reports revealed its disclosures may be "incomplete or inaccurate."¹⁷⁹ In May 2023, media reports indicated that UC Berkeley had failed to disclose to the Department hundreds of millions of dollars in funding from a foreign government.¹⁸⁰ After further investigation, the Department transmitted a letter to the school requesting that it address the allegations, and in its responses to the Department on June 16 and July 7, 2023, UC Berkeley acknowledged having failed to disclose millions in foreign government funding under section 117. Even so, the Biden-Harris Administration still declined to open an investigation into UC Berkeley despite this acknowledgement. The Department's April 25 notice of investigation and document request is closely related to the Committees' prior investigation of Tsinghua-Berkeley Shenzhen Institute, a partnership between UC Berkeley's College of Engineering and China's Tsinghua University, discussed in *CCP on the Quad*.¹⁸¹

On May 8, 2025, the Department opened a section 117 investigation at UPenn.¹⁸² UPenn previously had not disclosed any foreign funding until February of 2019.¹⁸³ According to the Department, UPenn has frequently anonymized donor identities and also failed to submit gifts and contracts in a timely manner.¹⁸⁴ The current request seeks documents and records related to compliance.¹⁸⁵

The Administration also opened a section 117 investigation at the University of Michigan on July 15. Although the university did close the aforementioned SJTU-UM Joint Institute, the Administration highlighted that some senior university administrative personnel still show "apparent

indifference” to national security concerns.^{186 187} The Administration also questioned the effectiveness of the university’s foreign funding compliance capabilities, given that an estimated 20 percent of the University of Michigan’s section 117 disclosures were submitted late and many counterparties were misidentified.¹⁸⁸

FIXING THE PROBLEM: RECOMMENDATIONS

CCP on the Quad laid out a detailed analysis of the gaps in U.S. policy and regulation that have enabled the CCP to exploit American universities. This report highlights additional issues in academic partnerships and ongoing problems with foreign gift and contract disclosures. Chairman Moolenaar and Chairman Walberg therefore urge the Senate to expeditiously adopt House-passed legislation to address troubling academic partnerships and to take up the House-passed *DETERRENT Act*.

The *Securing American Funding and Expertise from Adversarial Research Exploitation Act of 2025 (SAFE Research Act)* will prohibit federal funding to researchers in science and technology fields whose collaborations with foreign adversaries may pose a U.S. national security risk and prohibit Department of Defense funding to universities who partner with Chinese institutions that pose a U.S. national security risk.

In addition, the *SAFE Research Act* will require enhanced disclosures from federal researchers of their ties to foreign adversary countries, including disclosure of collaboration, funding, travel, and affiliations with entities and individuals based in a foreign adversary country like the PRC. Finally, the bill will restrict federally funded researchers from sharing non-published research outcomes or expertise with prohibited foreign adversary entities even after the life of the grant.

The *SAFE Research Act* was introduced and adopted by the House as an amendment to the Fiscal Year 2026 National Defense Authorization Act (FY26 NDAA), which passed the House on September 10, 2025.

The Chairmen also continue to urge adoption of the *DETERRENT Act* to require enhanced transparency from universities and researchers of foreign gifts and contracts. On February 6, 2025, Rep. Michael Baumgartner (R-WA) introduced the *DETERRENT Act* as H.R. 1048.¹⁸⁹ The *DETERRENT Act* had 21 cosponsors, including two Democratic Members: Rep. Donald Davis (D-NC) and Rep. Marie Gluesenkamp Perez (D-WA). The bipartisan cosponsorship of the *DETERRENT Act* foreshadowed its bipartisan support when it passed the House on March 27, 2025, in a 241-169 vote.¹⁹⁰ On April 3, 2025, Senator Thom Tillis (R-NC) introduced the Senate companion (S.1296).¹⁹¹ S.1296 has 13 Republican cosponsors, including Senate HELP Committee Chairman Dr. Bill Cassidy (R-LA).¹⁹² We continue to urge

the Senate to pass the DETERRENT Act and President Trump to sign this bill into law. As passed in the House, the DETERRENT Act does the following:

- 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.

ENDNOTE

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- ¹ The Select Committee on the CCP, *CCP on the Quad: How American Taxpayers and Universities Fund the CCP's Advanced Military and Technological Research* (Sept. 23, 2024), available at <https://selectcommitteeontheccp.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/-/files/evo-media-document/RS%20Report%20Cover%20Final%20%281%29-merged-compressed%20%282%29.pdf> (CCP on the Quad).
- ² CCP on the Quad at 11.
- ³ CCP on the Quad at 1.
- ⁴ CCP on the Quad at 7-8.
- ⁵ CCP on the Quad at 2.
- ⁶ CCP on the Quad at 32-33.
- ⁷ U.S. Gov't Accountability Off., *Federal Research: Information on Funding for U.S.-China Research Collaboration and Other International Activities*, GAO-22-105313 (Sept. 2022), <https://www.gao.gov/assets/gao-22-105313.pdf>.
- ⁸ CCP on the Quad at 33.
- ⁹ See CCP on the Quad at 30-33.
- ¹⁰ CCP on the Quad at 53.
- ¹¹ CCP on the Quad at 3.
- ¹² CCP on the Quad at 30-33.
- ¹³ Letter, U.S. House of Reps. Select Comm. on the Strategic Competition Between the U.S. and the Chinese Communist Party to President Vincent Price, Duke University (May 14, 2025), available at <https://selectcommitteeontheccp.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/Moolenaar%20Walberg%20Letter%20to%20Duke%20University-compressed.pdf>.
- ¹⁴ Shanghai Jiao-Tong University is a SASTIND supervised school. See Alex Joske, *The China Defense Universities Tracker*, AUST. STRATEGIC POL'Y INST. (2019) (China Defense Universities Tracker) Shanghai Jiao Tong University, available at <https://web.archive.org/web/20250819151228/https://unitracker.aspi.org.au/universities/shanghai-jiaotong-university/>.
- ¹⁵ CCP on the Quad at 25-26.
- ¹⁶ Duke Kunshan University, Military Training (last visited June 30, 2025), available at <https://campus-life.dukekunshan.edu.cn/css/military-training/>.
- ¹⁷ UM-Shanghai Jiao Tong University Joint Institute [上海交通大学密西根学院], *Uniting Minds and Strength, Leading with Courage: SJTU Michigan Institute Holds Midterm Military Training Appreciation Ceremony for the 2014 Cohort* [凝心聚力 敢为人先——上海交通大学密西根学院2014级军训中期慰问大会顺利举行], (Sept. 7, 2015), <https://www.ji.sjtu.edu.cn/cn/off-the-press-zh/2015-09-07/19931/>. The original website has since been taken down, but this post—along with its accompanying photograph—remains accessible via an automated RSS aggregator that preserves archived news and events from the University of Michigan–Shanghai Jiao Tong University Joint Institute. Archived via RSSing.com: https://shanghai1225.rssing.com/chan-52492895/all_p1.html (<https://archive.vn/YQG5K>).
- ¹⁸ UM-SJT Joint Institute [上海交通大学密西根学院], *The JI Summer Social Practice Group Visited Key Enterprises and Start-ups in Beijing* [密院暑期社会实践团参访北京重点企业和创业公司] (Aug. 8, 2016), available at: <https://web.archive.org/web/20250613170954/https://www.ji.sjtu.edu.cn/cn/off-the-press-zh/2015-08-16/19745/>.
- ¹⁹ Letter, U.S. House of Reps. Select Comm. on the Strategic Competition Between the U.S. and the Chinese Communist Party to President Santa Ono, Univ. of Michigan (Oct. 31, 2024), available at <https://selectcommitteeontheccp.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/2024-10-31%20->

[%20Letter%20to%20U-M%20re%20Research%20Security%20House%20Select%20Cmte%20CCP.pdf](#); U.S. Att’y Off., E.D. Mich., *United States Attorney’s Office Issues 2024 Annual Report* (Jan. 17, 2025), <https://www.justice.gov/usao-edmi/pr/united-states-attorneys-office-issues-2024-annual-report>.

²⁰ Letter, U.S. House of Reps. Select Comm. on the Strategic Competition Between the U.S. and the Chinese Communist Party to President Vincent Price, Duke University (May 15, 2025), available at <https://selectcommitteeontheccp.house.gov/media/press-releases/moolenaar-walberg-call-duke-terminate-china-based-campus-over-national>.

²¹ CCP on the Quad at Appendix A.

²² Michael Banks, *The Story of the First Sino-American Joint University’s Physics Institute* | PW Column [第一个中美合作大学的物理研究所的故事 | PW 专栏], *Intellectuals* (Sept. 25, 2017), https://mp.weixin.qq.com/s?src=11×tamp=1722549680&ver=5419&signature=JpndRKuChw0jL9lGeUOYd5de1dfodQ8*Xwde6K*KYfqUzROuPr-X3OXFHwEP0hFp9kBF2gugiUYRI9sIXrvICbz1Ld1leVp5AQ0NqMY-QzR3ZbiZx9qA1WZeQVIMAE-b&new=1; Joint Research Center, *Focusing on Cutting-Edge Issues in Quantum Physics, Face-to-Face with Global Physics Masters* [聚焦量子物理学前沿问题, 与全球物理学大师面对面], Joint Research Center [联合研究中心] (June 2, 2016), available at <https://web.archive.org/web/20240801220434/https://mp.weixin.qq.com/s?src=11×tamp=1722549680&ver=5419&signature=yo4c7coSBhFu6-R18S4ipGT%2AGQ1WD0Yjigg1DeetkwmtZDQ3xz0Pm799pSt5D8Ym8CkwTwqlwXvjbcqXRT0BiIv6yuFb9VLnFWXS0TrJtuO1kQ1ZhGJoHJ5-AeX9QXp6&new=1>; Shanghai New York University [上海纽约大学], Chinese Higher Education Foreign Cooperation Regulatory Information Network [教育涉外监管信息网] (archived on July 17, 2024), <https://web.archive.org/web/20240717180402/https://www.crs.jsj.edu.cn/aproval/detail/773>; see Shanghai New York University [上海纽约大学], Chinese Higher Education Foreign Cooperation Regulatory Information Network [教育涉外监管信息网] (archived on July 17, 2024), <https://web.archive.org/web/20240717180402/https://www.crs.jsj.edu.cn/aproval/detail/773>.

²³ East China Normal University and China Aerospace 510 Institute signed an Agreement to Initiate Joint Research and Talent Training [华东师大与中国航天510所签约 启动联合研究和人才培养] (Feb. 5, 2018), available at <http://www.opticsjournal.net/Lab/LB11082200028.htm?action=post&oid=PT180205000307rXu1x> (<https://archive.fo/uPfbS>); Organizational Structure [组织架构 Structure], East China Normal University [华东师范大学] (archived Mar. 31, 2021), available at <http://www.iud.ecnu.edu.cn/14971/list.htm> (<https://archive.fo/k6mHU>).

²⁴ Michael Banks, *The Story of the First Sino-American Joint University’s Physics Institute* | PW Column [第一个中美合作大学的物理研究所的故事 | PW 专栏], *Intellectuals* (Sept. 25, 2017), https://web.archive.org/web/20240801220740/https://mp.weixin.qq.com/s?src=11×tamp=1722549680&ver=5419&signature=JpndRKuChw0jL9lGeUOYd5de1dfodQ8*Xwde6K*KYfqUzROuPr-X3OXFHwEP0hFp9kBF2gugiUYRI9sIXrvICbz1Ld1leVp5AQ0NqMY-QzR3ZbiZx9qA1WZeQVIMAE-b&new=1; Joint Research Center [联合研究中心], *Focusing on Cutting-Edge Issues in Quantum Physics, Face-to-Face with Global Physics Masters* [聚焦量子物理学前沿问题, 与全球物理学大师面对面] (June 2, 2016), available at <https://web.archive.org/web/20240801220434/https://mp.weixin.qq.com/s?src=11×tamp=1722549680&ver=5419&signature=yo4c7coSBhFu6-R18S4ipGT%2AGQ1WD0Yjigg1DeetkwmtZDQ3xz0Pm799pSt5D8Ym8CkwTwqlwXvjbcqXRT0BiIv6yuFb9VLnFWXS0TrJtuO1kQ1ZhGJoHJ5-AeX9QXp6&new=1>.

²⁵ *Optics* [光学], (last visited July 1, 2025), available at <https://web.archive.org/web/20240801204849/http://netprogram.shanghai.nyu.edu/cn/areas-of-study/optics>; Research Team [研究团队], NYU Shanghai (archived Aug 1, 2024), available at <https://web.archive.org/web/20240801205202/https://shanghai.nyu.edu/cn/research/cc/team>; *Research direction* [研究方向], State Key Laboratory of Precision Spectroscopy Science and Technology (archived Aug 1, 2024), available at <https://web.archive.org/web/20240801222016/http://www.lps.ecnu.edu.cn/35941/list.htm>; U.S.-China Economic and Security Review Commission, Hearing on “China’s Pursuit of Next Frontier Tech: Computing, Robotics, and Biotechnology,” written testimony of John Costello (Mar. 16, 2017), 4–5, available at <https://www.uscc.gov/hearings/hearing-chinas-pursuit-next-frontier-tech-computing-robotics-and-biotechnology>; Cindy Hurst, *The Quantum Leap into Computing and Communication: A*

Chinese Perspective, Joint Force Quarterly 77 (Apr. 1, 2015), https://ndupress.ndu.edu/Portals/68/Documents/jfq/jfq-77/jfq-77_44-50_Hurst.pdf; People, NYU Quantum Technology Lab (last visited July 1, 2025), available at <https://web.archive.org/web/20240801210159/https://nyu.timbyrnes.net/people/>; Bentai Li, *Recruitment Announcement for the Quantum Information and Cold Atom Laboratory at East China Normal University/NYU Shanghai* [华东师范大学上海纽约大学量子信息与冷原子实验室招聘人员启事], State Key Laboratory of Precision Spectroscopy [精密光谱科学与技术国家重点实验室] (Oct. 18, 2016), available at <https://web.archive.org/web/20240801212142/http://www.lps.ecnu.edu.cn/85/30/c35959a427312/page.htm>; Condensed Matter Quantum Dynamics in Computational Chemistry | Professor Sun Xiang's Laboratory [计算化学之凝聚态量子动力学 | 孙翔教授实验室], Computational Chemistry Joint Research Center (Jun. 9, 2021), https://web.archive.org/web/20240801214724/https://mp.weixin.qq.com/s?__biz=MzAxMzM0NzAxNA%3D&mid=2650063482&idx=1&sn=6917f412ea7b067a027b31c78cd5160a&chksm=83a393d3b4d41ac5f24e7fa0bc912add7e14de056507fdd03582637468885e702c883ab36422&mpshare=1&scene=1&srcid=1221ZgU6cxyYo1flsXl6Zyex&sharer_sharetime=1640063994412&sharer_shareid=97d72051a143556647f876c0f37099c4&exportkey=AbnevGzaK9gMXbViSHb2DR4%3D&pass_ticket=Mly4QBODBM2Q0uQrbzATWBWglhVPZyhYjGYajl97jEp4ApqlojYEPIPHnTn84u&wx_header=0#rd; Tim Byrnes & Ebubechukwu O. Ilo-Okeke, *Quantum Atom Optics: Theory and Applications to Quantum Technology*, Cambridge University Press (July 2021), available at <https://www.cambridge.org/core/books/quantum-atom-optics/2D867888B5C666D3A936F1C942C99568>.

²⁶ Ministry of Education of the People's Republic of China [中华人民共和国教育部], MOE Foreign Cooperation – Dalian Maritime & Houston International [大连海事大学休斯顿国际学院] (July 16, 2024), available at <https://web.archive.org/web/20240716181548/https://www.crs.jsj.edu.cn/aproval/detail/2788>; see Houston International Institute, Dalian Maritime University [大连海事大学休斯顿国际学院], Chinese Higher Education Foreign Cooperation Regulatory Information Network [教育涉外监管信息网] (archived on July 17, 2024), <https://web.archive.org/web/20240923171835/https://www.crs.jsj.edu.cn/aproval/detail/2788>. It builds on a 2018 strategic cooperation agreement between DMU and the University of Houston's College of Engineering, following an initial 2017 MOU, with joint work in submarine engineering research. See Dalian Maritime Univ., *Signing Ceremony Between DMU and Univ. of Houston's College of Engineering*, DMU News (Jan. 10, 2018), <https://web.archive.org/web/20250703154247/https://english.dlmu.edu.cn/info/1041/1014.htm>.

²⁷ Dalian Maritime University [大连海事大学], School Profile [学校简介] (Dec. 2024), available at <https://archive.fo/RAFcQ>; *Big News! Our University Has Been Approved as a University Jointly Established by the State Administration of Science, Technology and Industry for National Defense and the Ministry of Transport*, Dalian Maritime (Nov. 5, 2018), available at <https://archive.fo/5s9uE>.

²⁸ The Department of Navigation of Dalian Naval Academy went to the Navigation College to investigate and exchange the effectiveness and characteristic development of the school, Dalian Naval Academy (May 8, 2018), available at <https://archive.fo/uszcu>; Aijun Zhou et al., *Memory State Feedback Stabilization for Time-Varying Delayed Neural Networks Systems*, International Symposium on Neural Networks (May 20, 2009) available at https://dl.acm.org/doi/10.1007/978-3-642-01507-6_52; Baozhu Jia et al., *Fuzzy switching controller for multiple model*, International Conference on Fuzzy Systems and Knowledge Discovery (Aug. 27, 2005) available at https://dl.acm.org/doi/10.1007/11539506_125.

²⁹ Office of the Civil-Military Integration Development Committee of the Hubei Provincial Committee of the Communist Party of China [中共湖北省委军民融合发展委员会办公室], 722 Institute Signed a Strategic Cooperation Agreement with Dalian Maritime University [七二二所携手大连海事大学签订战略合作协议] (Jan. 3, 2018), available at <https://archive.ph/S8BSc>; Sarah Kirchberger, *China Maritime Report No. 31: China's Submarine Industrial Base: State-Led Innovation with Chinese Characteristics*, CMSI China Maritime Report, U.S. Naval War College (Sept. 29, 2023), available at <https://digital-commons.usnwc.edu/cgi/viewcontent.cgi?article=1030&context=cmsi-maritime-reports>.

³⁰ Dalian Maritime University [大连海事大学], School Profile [学校简介] (Dec. 2020), available at <https://archive.fo/RAFcQ>.

³¹ See List of Chinese-Foreign Cooperative Education Institutions and Programs at the Master's Level and Above (Including Cooperative Education Institutes and Projects in Hong Kong, Macao, and Taiwan) [硕士及 84 以上中外合作办学机构与项目(含内地与港台地区合作办学机构与项目)名单], MINISTRY OF EDUC. FOREIGN AFFS. INFO. NETWORK (July 15, 2024), <https://web.archive.org/web/20240715150438/https://www.crs.jsj.edu.cn/aproval/orglists/1>; List of Chinese-Foreign Cooperative Education Institutions and Programs at the Master's Level and Above (Including Cooperative Education Institutes and Projects in Hong Kong, Macao, and Taiwan) [硕士及以上中外合作办学机构与项目(含内地与港台地区合作办学机构与项目)名单], MINISTRY OF EDUC. FOREIGN AFFS. INFO. NETWORK (July 15, 2024), <https://web.archive.org/web/20240715150352/https://www.crs.jsj.edu.cn/aproval/orglists/2>.

³² CCP on the Quad at 31-33.

³³ See Georgia Tech Research Institute, *GTRI UARC Research and Engineering Support to the AFLCMC* (last visited June 30, 2025), available at <https://aflcmc.gtri.gatech.edu/>.

³⁴ See University of Detroit Mercy, *Center for Cybersecurity & Intelligence Studies* (last visited June 30, 2025), available at <https://chass.udmercy.edu/academics/cis/center-for-cyber-intel-studies.php>; Eastern Michigan University, *School of International Security & Applied Computing* (last visited June 30, 2025), available at <https://www.emich.edu/cet/information-security/programs/cyber-security-bs/index.php>; Oakland University, *Oakland University Center for Cybersecurity* (last visited June 30, 2025), available at [https://www.oakland.edu/secs/labs-and-centers/cybersecurity/#:~:text=Oakland%20University%20is%20designated%20as,Cybersecurity%20\(NCAE%2DC\)](https://www.oakland.edu/secs/labs-and-centers/cybersecurity/#:~:text=Oakland%20University%20is%20designated%20as,Cybersecurity%20(NCAE%2DC).).

³⁵ "China Defense Universities Tracker – Harbin Institute of Technology," Australian Strategic Policy Institute (May 4, 2021), available at *China Defense Universities Tracker – Harbin Institute of Technology*, Australian Strategic Policy Institute (May 4, 2021), available at <https://web.archive.org/web/20250726065504/https://unitracker.aspi.org.au/universities/harbin-institute-of-technology/>.

³⁶ *China Defense Universities Tracker – Beijing Institute of Technology*, Australian Strategic Policy Institute (May 13, 2021), available at <https://web.archive.org/web/20250602114811/https://unitracker.aspi.org.au/universities/beijing-institute-of-technology/>.

³⁷ *Id.*

³⁸ Houston International Institute, a joint institute between the University of Houston and SASTIND-administered Dalian Maritime University (DMU), was launched in 2020 following a 2017 MOU to deepen cooperation in submarine engineering research. See Dalian Maritime University, *The Signing Ceremony of the Cooperation between DMU College of International Collaboration and College of Engineering of University of Houston* (Jan. 10, 2018), available at <https://archive.fo/HvB0K#selection-429.179-435.1>.

³⁹ The program currently enrolls over 300 students and offers undergraduate degrees in mechanical, civil, and electrical engineering, and awards dual diplomas from both universities. See Ministry of Education of the People's Republic of China [中华人民共和国教育部], *Dalian Maritime University, Houston University* [大连海事大学休斯顿国际学院] (Jul. 16, 2024), available at <https://web.archive.org/web/20240716181548/https://www.crs.jsj.edu.cn/aproval/detail/2788>.

⁴⁰ *China Defense Universities Tracker – Dalian Maritime*, Australian Strategic Policy Institute (May 13, 2021), available at <https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/dalian-maritime-university/>.

⁴¹ *China Defense Universities Tracker – Shenyang Aerospace University*, Australian Strategic Policy Institute (Nov. 18, 2019), available at <https://web.archive.org/web/20250607010010/https://unitracker.aspi.org.au/universities/shenyang-aerospace-university/>.

⁴² *China Defense Universities Tracker – Shenyang Aerospace University*, Australian Strategic Policy Institute (Nov. 15, 2019), available at <https://web.archive.org/web/20250607010010/https://unitracker.aspi.org.au/universities/shenyang-aerospace-university/>.

⁴³ *China Defense Universities Tracker – North China Institute of Aerospace Engineering*, Australian Strategic Policy Institute (Nov. 18, 2019), available at [https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/north-china-institute-of-aerospace-engineering/\(MEUs=CASC+CASIC\)](https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/north-china-institute-of-aerospace-engineering/(MEUs=CASC+CASIC)).

⁴⁴ *China Defense Universities Tracker – North China Institute of Aerospace Engineering*, Australian Strategic Policy Institute (Nov. 18, 2019), available at <https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/north-china-institute-of-aerospace-engineering/>.

⁴⁵ Program status verified through the Ministry of Education's Chinese Higher Education Foreign Cooperation Regulatory Information Network as of June 2025. Closed or inactive programs were excluded. Delisting or update delays may not be reflected; source timelines provide context. See List of Sino-Foreign Joint Education Institutions and Programs at the Master's Level and Above (Including Joint Programs with Mainland China, Hong Kong, Macao, and Taiwan) [硕士及以上中外合作办学机构与项目(含内地与港台地区合作办学机构与项目)名单], Chinese Higher Education Foreign Cooperation Regulatory Information Network [教育涉外监管信息网], <https://www.crs.jsj.edu.cn/aproval/orglists/1/>; List of Sino-Foreign Joint Education Institutions and Programs at the Undergraduate Level (Including Joint Programs with Mainland China, Hong Kong, Macao, and Taiwan) [本科中外合作办学机构与项目(含内地与港台地区合作办学机构与项目)名单], Chinese Higher Education Foreign Cooperation Regulatory Information Network [教育涉外监管信息网], <https://web.archive.org/web/20250701042426/https://www.crs.jsj.edu.cn/aproval/orglists/2/>.

⁴⁶ Alex Joske, *The China Defence Universities Tracker*, Austl. Strategic Pol'y Inst. (2019), <https://www.aspi.org.au/report/china-defence-universities-tracker> (like the Seven Sons of National Defense, the "Seven Sons of the Arms Industry" [兵工七子] are a group of Chinese universities previously subordinate to the Ministry of Ordnance Industry [兵器工业部], all of which are still involved in researching and developing weapons).

⁴⁷ *Id.* (The PRC's State Administration for Science, Technology, and Industry for National Defense seeks to create "universities with national defense characteristics" including by setting up defense laboratories and research areas at "civilian" PRC universities.).

⁴⁸ *Id.* (this includes three types of laboratories: national defense science and technology key laboratories (国防科技重点实验室); national defense key discipline laboratories (国防重点学科实验室); Ministry of Education national defense key laboratories (教育部国防重点实验室)).

⁴⁹ *Id.* ("Disciplines with national defense characteristics (国防特色学科)" are military-aligned fields in civilian universities, supporting defense research and talent pipelines.).

⁵⁰ National Administration of State Secrets Protection [国家保密局], Weapons and Equipment Research and Production Unit Secrecy Credential [武器装备科研生产单位保密资质], Gov.cn (June 4, 2025), available at <https://web.archive.org/web/20250611175734/https://www.gjbmj.gov.cn/n1/2025/0604/c419767-40494024.html> (this credential, issued by the National Administration of State Secrets Protection, the Central Military Commission's Equipment Development Department, and SASTIND, is required for participation in classified defense projects).

⁵¹ *China Defense Universities Tracker – Harbin Institute of Technology*, Australian Strategic Policy Institute (May 4, 2021), available at <https://web.archive.org/web/20250726065504/https://unitracker.aspi.org.au/universities/harbin-institute-of-technology/>. (MEU = PLA ties).

⁵² Ministry of Education of the People's Republic of China [中华人民共和国教育部], *Harbin Institute of Technology and the University of Arizona jointly launch a master's degree program in management information systems* [哈尔滨工业大学与美国亚利桑那大学合作举办管理信息系统硕士学位教育项目], (Archived July 2, 2025), available at <https://archive.ph/tbdeX>.

⁵³ *China Defense Universities Tracker – Beijing Institute of Technology*, Australian Strategic Policy Institute (May 13, 2021), available at <https://web.archive.org/web/20250602114811/https://unitracker.aspi.org.au/universities/beijing-institute-of-technology/>. (MEU = PLA ties, Innovation Platform Union of National Defense Science and Technology).

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- ⁵⁴ Ministry of Education of the People's Republic of China [中华人民共和国教育部], *Beijing Institute of Technology & Bryant University Jointly Launched an Accounting Undergraduate Education Program* [北京理工大学珠海学院与美国布莱恩特大学合作举办会计学专业本科教育项目] (July 2, 2025), available at <https://web.archive.org/web/20240721172757/https://www.crs.jsj.edu.cn/aproval/detail/1882>.
- ⁵⁵ *China Defence Universities Tracker – Beijing Institute of Technology*, Australian Strategic Policy Institute (May 13, 2021) available at <https://web.archive.org/web/20250602114811/https://unitracker.aspi.org.au/universities/beijing-institute-of-technology/>. (MEU = PLA ties, Innovation Platform Union of National Defense Science and Technology).
- ⁵⁶ Ministry of Education of the People's Republic of China [中华人民共和国教育部], *Beijing Institute of Technology & Utah State University Jointly Launch a Bachelors' Degree Program in International Economics*, available at <https://web.archive.org/web/20240716184137/https://www.crs.jsj.edu.cn/aproval/-detail/386>.
- ⁵⁷ *China Defence Universities Tracker – Chongqing University of Posts and Telecommunications*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414153927/https://unitracker.aspi.org.au/universities/chongqing-university-of-posts-and-telecommunications/> (MEU status as National 3G Civil-Military Terminal Equipment Mobilization Center/National Broadband Mobile Communication Civil-Military Terminal Mobilization Center).
- ⁵⁸ Ministry of Education of the People's Republic of China [中华人民共和国教育部], *Chongqing University and Northern Arizona* [重庆大学与北亚利桑那大学合作], (July 2, 2025), available at <https://web.archive.org/web/20240722165015/https://www.crs.jsj.edu.cn/aproval/detail/943>.
- ⁵⁹ *China Defence Universities Tracker – Chongqing University of Posts and Telecommunications*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414153927/https://unitracker.aspi.org.au/universities/chongqing-university-of-posts-and-telecommunications/> (MEU status as National 3G Civil-Military Terminal Equipment Mobilization Center/National Broadband Mobile Communication Civil-Military Terminal Mobilization Center).
- ⁶⁰ Ministry of Education of the People's Republic of China [中华人民共和国教育部], *SUNY Albany and Chongqing University* [重庆大学与纽约州立大学奥尔巴尼分校合作], (July 2, 2025), available at <https://web.archive.org/web/20240722184740/https://www.crs.jsj.edu.cn/aproval/detail/2190>.
- ⁶¹ *China Defence Universities Tracker – Changchun University of Science and Technology*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/changchun-university-of-science-and-technology/>.
- ⁶² Ministry of Education of the People's Republic of China [中华人民共和国教育部], *Changchun University and Delaware State* [长春大学与特拉华州立大学合作] (July 2, 2025), available at <https://web.archive.org/web/20240724175255/https://www.crs.jsj.edu.cn/aproval/detail/1863>.
- ⁶³ Ministry of Education of the People's Republic of China [中华人民共和国教育部], *Duke and Wuhan University* [武汉大学与杜克大学合作] (July 2, 2025), available at <https://web.archive.org/web/20240721163828/https://www.crs.jsj.edu.cn/aproval/detail/1004>.
- ⁶⁴ *China Defence Universities Tracker – Wuhan University*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250527001919/https://unitracker.aspi.org.au/universities/wuhan-university/> (MEU status due to ties with TC&S).
- ⁶⁵ *China Defence Universities Tracker – University of Electronic Science and Technology of China*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250530063952/https://unitracker.aspi.org.au/universities/university-of-electronic-science-and-technology-of-china/> (MEU status due to ties with CAEP).
- ⁶⁶ Ministry of Education of the People's Republic of China [中华人民共和国教育部], *Webster University* [韦伯斯特大学合作] (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/-145>.

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- ⁶⁷ *China Defence Universities Tracker – Nanchang Hangkong University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414154214/https://unitracker.aspi.org.au/universities/nanchang-hangkong-university/> (MEU status due to ties with AVIC, PLA critical mineral supply).
- ⁶⁸ *China Defence Universities Tracker – Xidian University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250801045148/https://unitracker.aspi.org.au/universities/xidian-university/>.
- ⁶⁹ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Xidian and Virginia Tech [西安电子科技大学与弗吉尼亚理工大学合作], (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/3001>.
- ⁷⁰ *China Defence Universities Tracker – Shenyang Aerospace University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250607010010/https://unitracker.aspi.org.au/universities/shenyang-aerospace-university/> (MEU status due to ties with SAU, AVIC).
- ⁷¹ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Shenyang and Southern Illinois University [沈阳大学与南伊利诺伊大学合作] (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/2507>.
- ⁷² *China Defence Universities Tracker – Xi’an Jiaotong University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250826120552/https://unitracker.aspi.org.au/universities/xian-jiaotong-university/> (MEU status due to ties with CASTIC, CASC).
- ⁷³ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Xi’an Jiaotong and University of Texas at Arlington [西安交通大学与德克萨斯大学阿灵顿分校合作] (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/147>.
- ⁷⁴ *China Defence Universities Tracker – Sun Yat-sen University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414154619/https://unitracker.aspi.org.au/universities/sun-yat-sen-university/>.
- ⁷⁵ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Sun Yat-sen and University of Minnesota [中山大学与明尼苏达大学合作] (July 2, 2025), available at <https://web.archive.org/web/20240721163744/https://www.crs.jsj.edu.cn/aproval/detail/162>.
- ⁷⁶ *China Defence Universities Tracker – Tsinghua University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250815002424/https://unitracker.aspi.org.au/universities/tsinghua-university/> (MEU status due to ties with CAEP, Rocket Force University of Engineering).
- ⁷⁷ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Tsinghua and Temple University [清华大学与天普大学合作], (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/435>.
- ⁷⁸ *China Defence Universities Tracker – Tsinghua University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250815002424/https://unitracker.aspi.org.au/universities/tsinghua-university/> (MEU status due to ties with CAEP, Rocket Force University of Engineering).
- ⁷⁹ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Tsinghua and Johns Hopkins University [清华大学与约翰霍普金斯大学合作] (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/2167>.
- ⁸⁰ *China Defence Universities Tracker – Heilongjiang Institute of Technology*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414154058/https://unitracker.aspi.org.au/universities/heilongjiang-institute-of-technology/> (MEU status due to ties with CASC, CASTC).
- ⁸¹ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Heilongjiang and Western Illinois University [黑龙江大学与西伊利诺伊大学合作] (July 2, 2025), available at <https://web.archive.org/web/20240722193931/https://www.crs.jsj.edu.cn/aproval/detail/2128>.

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- ⁸² *China Defence Universities Tracker – Soochow University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414154541/https://unitracker.aspi.org.au/universities/soochow-university/> (MEU status due to ties with CASC).
- ⁸³ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], California State and Soochow University [加利福尼亚州立大学北岭分校与苏州大学合作] (July 2, 2025), available at <https://web.archive.org/web/20240710201412/https://www.crs.jsj.edu.cn/aproval/detail/1054>.
- ⁸⁴ *China Defence Universities Tracker – Lanzhou University*, Austl. Strategic Pol’y Inst. (July 2, 2025), <https://unitracker.aspi.org.au/universities/lanzhou-university> (MEU status due to ties with NORINCO).
- ⁸⁵ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Lanzhou and Drexel University [兰州大学与德雷塞尔大学合作] (July 2, 2025), available at <https://web.archive.org/web/20240722185324/https://www.crs.jsj.edu.cn/aproval/detail/2352>.
- ⁸⁶ *China Defence Universities Tracker – North China Institute of Aerospace Engineering*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/north-china-institute-of-aerospace-engineering/> (MEU status due to ties with CASC, CASIC).
- ⁸⁷ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], St. Martin’s University [圣马丁大学合作] (July 2, 2025), available at <https://web.archive.org/web/20240722192813/https://www.crs.jsj.edu.cn/aproval/detail/2237>.
- ⁸⁸ “*China Defence Universities Tracker – Dalian University of Technology*,” Austl. Strategic Pol’y Inst. (July 2, 2025), <https://web.archive.org/web/20250414153951/https://unitracker.aspi.org.au/universities/dalian-university-of-technology/> (MEU status due to relationship with PLA Navy, CNNC).
- ⁸⁹ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Dalian and UC Irvine [大连大学与加利福尼亚大学欧文分校合作] (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/2497>.
- ⁹⁰ *China Defence Universities Tracker – Southwest University of Science and Technology*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414154601/https://unitracker.aspi.org.au/universities/southwest-university-of-science-and-technology/> (MEU status due to ties with CAEP, PLA).
- ⁹¹ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Southwest University and Tennessee State [西南科技大学与田纳西州立大学合作] (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/3300>.
- ⁹² *China Defence Universities Tracker – Chongqing University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/chongqing-university/> (MEU status due to ties with CASTC).
- ⁹³ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Chongqing and University of Cincinnati [重庆大学与辛辛那提大学合作] (July 2, 2025), available at <https://web.archive.org/web/20240722182548/https://www.crs.jsj.edu.cn/aproval/detail/1164>.
- ⁹⁴ *China Defence Universities Tracker – Chongqing University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/chongqing-university/> (MEU status due to ties with CASTC).
- ⁹⁵ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Chongqing and University of Cincinnati [重庆大学与辛辛那提大学合作] (July 2, 2025), available at <https://web.archive.org/web/20240722182548/https://www.crs.jsj.edu.cn/aproval/detail/1164>.
- ⁹⁶ *China Defence Universities Tracker – Soochow University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414154541/https://unitracker.aspi.org.au/universities/soochow-university/> (MEU status due to ties with CASC).

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- ⁹⁷ Ministry of Education of the People's Republic of China [中华人民共和国教育部], Suzhou University College of Applied Technology and California State University, Northridge [苏州大学应用技术学院与加利福尼亚州立大学北岭分校合作] (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/2229>.
- ⁹⁸ *China Defence Universities Tracker – University of Shanghai for Science and Technology*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/university-of-shanghai-for-science-and-technology/> (MEU status due to ties with NORINCO).
- ⁹⁹ Ministry of Education of the People's Republic of China [中华人民共和国教育部], Queens College and University of Shanghai [皇后学院与上海大学合作] (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/576>.
- ¹⁰⁰ *China Defence Universities Tracker – Soochow University*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414154541/https://unitracker.aspi.org.au/universities/soochow-university/> (MEU status due to ties with CASC).
- ¹⁰¹ Ministry of Education of the People's Republic of China [中华人民共和国教育部], University of Arkansas and Soochow University [阿肯色大学与苏州大学合作] (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/951>.
- ¹⁰² *China Defence Universities Tracker – University of Shanghai for Science and Technology*, Austl. Strategic Pol'y Inst. (July 2, 2025) available at <https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/university-of-shanghai-for-science-and-technology/> (MEU status due to ties with NORINCO).
- ¹⁰³ Ministry of Education of the People's Republic of China [中华人民共和国教育部], University of North Dakota and Shanghai University [北达科他大学与上海大学合作] (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/271>.
- ¹⁰⁴ Ministry of Education of the People's Republic of China [中华人民共和国教育部], Houston International Institute and Dalian Maritime University [休斯顿国际学院与大连海事大学合作] (July 2, 2025), available at <https://web.archive.org/web/20240716181548/https://www.crs.jsj.edu.cn/aproval/detail/2788>.
- ¹⁰⁵ *China Defence Universities Tracker – Dalian Maritime University*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/dalian-maritime-university/> (MEU status due to ties with CHIRS, PLA).
- ¹⁰⁶ *China Defence Universities Tracker – Central South University*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/central-south-university/> (MEU status due to ties with CASTC).
- ¹⁰⁷ Ministry of Education of the People's Republic of China [中华人民共和国教育部], Central South University and University of California, San Francisco [中南大学与加利福尼亚大学旧金山分校合作] (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/2359>.
- ¹⁰⁸ *China Defence Universities Tracker – Hebei University*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/hebei-university/>.
- ¹⁰⁹ Ministry of Education of the People's Republic of China [中华人民共和国教育部], Hebei University and University of New Orleans [河北大学与新奥尔良大学合作] (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/3223>.
- ¹¹⁰ *China Defence Universities Tracker – Shijiazhuang Tiedao University*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414154532/https://unitracker.aspi.org.au/universities/shijiazhuang-tiedao-university/>.
- ¹¹¹ Ministry of Education of the People's Republic of China [中华人民共和国教育部], Shijiazhuang Tiedao University and Florida Institute of Technology [石家庄铁道大学与佛罗里达技术学院合作]

(July 2, 2025), available at

<https://web.archive.org/web/20240722192557/https://www.crs.jsj.edu.cn/aproval/detail/1857>.

¹¹² *China Defence Universities Tracker – Henan University of Science and Technology*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at

<https://web.archive.org/web/20250414154105/https://unitracker.aspi.org.au/universities/henan-university-of-science-and-technology/>.

¹¹³ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Henan University and Idaho State University [河南大学与爱达荷州立大学合作] (July 2, 2025), available at <https://web.archive.org/web/20240723054920/https://www.crs.jsj.edu.cn/aproval/detail/2493>.

¹¹⁴ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Anhui University and SUNY Stony Brook [安徽大学与纽约州立大学石溪分校合作] (July 2, 2025), available at <https://web.archive.org/web/20240715201713/https://www.crs.jsj.edu.cn/aproval/detail/2793>.

¹¹⁵ *China Defence Universities Tracker – Anhui University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at

<https://web.archive.org/web/20250414153659/https://unitracker.aspi.org.au/universities/anhui-university/>; Marcus Clay, *The Role of the Space Engineering University in the PLA Strategic Support Force*, at 13, Jamestown Found. China Brief (July 29, 2020), available at <https://jamestown.org/program/the-role-of-the-space-engineering-university-in-the-pla-strategic-support-force> (presence of classified research and defense-focused research areas at Anhui University); Anhui University [安徽大学], Research Units [研究单位] (last visited Aug. 29, 2025), available at <https://www.ahu.edu.cn/24281/list.htm> (Anhui University hosts multiple National State Key Laboratories in dual-use topic areas); Key Laboratory of Opto-Electronic Information Acquisition and Manipulation (Anhui University) [光电信息获取与操控重点实验室 (安徽大学)], Research Projects [研究项目] (last visited Aug. 29, 2025), available at <https://oeiam.ahu.edu.cn/20748/list.htm> (performance of research on behalf of Xi’an 504 Institute, which conducts defense research, and redacted research on behalf of provincial public security authorities); Eric Lee & Seamus Boyle, *Chinese Nuclear Missile Guidance Systems: Spotlight on the Xian Institute of Microelectronics Technology*, Project 2049 (Sept. 18, 2020), available at <https://project2049.net/2020/09/18/chinese-nuclear-missile-guidance-systems-spotlight-on-the-xian-institute-of-microelectronics-technology>; Anhui University Key Laboratory of Intelligent Computing & Signal Processing [安徽大学智能计算与信号处理重点实验室], Undertook Scientific Research Tasks from 2012 to 2016 [2012至2016年承担科学研究任务] (Sept. 22, 2017), available at <https://icsp.ahu.edu.cn/2017/0922/c4842a67503/page.htm> (the relevant Key Laboratory took part in China’s 863 program, a clandestine effort that provides “funding and guidance for efforts to clandestinely acquire US technology and sensitive economic information”); Nat’l Counterintelligence Exec., *Foreign Spies Stealing US Economic Secrets in Cyberspace: Report to Congress on Foreign Economic Collection and Industrial Espionage, 2009-2011*, at 5 (Oct. 2011), available at <https://nsarchive.gwu.edu/document/21451-document-55>.

¹¹⁶ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Arizona College of Technology and Hebei University [亚利桑那技术学院与河北大学合作], (July 2, 2025), available at <https://web.archive.org/web/20240715202024/https://www.crs.jsj.edu.cn/aproval/detail/2684>.

¹¹⁷ *China Defence Universities Tracker – Hebei University of Science and Technology*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250530063952/https://unitracker.aspi.org.au/universities/hebei-university-of-science-and-technology/>.

¹¹⁸ *China Defence Universities Tracker – Tianjin Polytechnic University*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250724002020/https://unitracker.aspi.org.au/universities/tianjin-polytechnic-university/>.

¹¹⁹ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Tianjin Polytechnic Institute and Bowling Green State [天津理工大学与鲍灵绿地利州立大学合作], (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/1033>.

¹²⁰ *China Defence Universities Tracker – Beijing University of Chemical Technology*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414153810/https://unitracker.aspi.org.au/universities/beijing-university-of-chemical-technology/>.

-
- ¹²¹ Ministry of Education of the People's Republic of China [中华人民共和国教育部], University of Detroit Mercy and Beijing University [底特律莫西大学与北京大学合作], (July 2, 2025), available at <https://web.archive.org/web/20240716191533/https://www.crs.jsj.edu.cn/aproval/detail/1094>.
- ¹²² *China Defence Universities Tracker – Beijing University of Chemical Technology*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414153810/https://unitracker.aspi.org.au/universities/beijing-university-of-chemical-technology/>.
- ¹²³ Ministry of Education of the People's Republic of China [中华人民共和国教育部], Beijing University and SUNY-ESF [北京大学与纽约州立大学环境科学与林业分校合作], (July 2, 2025), available at <https://web.archive.org/web/20240716192942/https://www.crs.jsj.edu.cn/aproval/detail/1124>.
- ¹²⁴ *China Defence Universities Tracker – Beijing University of Chemical Technology*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414153810/https://unitracker.aspi.org.au/universities/beijing-university-of-chemical-technology/>.
- ¹²⁵ Ministry of Education of the People's Republic of China [中华人民共和国教育部], Beijing University and University of Georgia [北京大学与佐治亚大学合作], (July 2, 2025), available at <https://web.archive.org/web/20240717152721/https://www.crs.jsj.edu.cn/aproval/detail/2822>.
- ¹²⁶ Ministry of Education of the People's Republic of China [中华人民共和国教育部], New York University and East China Normal [纽约大学与华东师范大学合作], (July 2, 2025), available at <https://web.archive.org/web/20240717180402/https://www.crs.jsj.edu.cn/aproval/detail/773>.
- ¹²⁷ *China Defence Universities Tracker – East China Normal University*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414154000/https://unitracker.aspi.org.au/universities/east-china-normal-university/>.
- ¹²⁸ Ministry of Education of the People's Republic of China [中华人民共和国教育部], Henan University and University of Miami [河南大学与迈阿密大学合作], (July 2, 2025), available at <https://web.archive.org/web/20240715202611/https://www.crs.jsj.edu.cn/aproval/detail/2166>.
- ¹²⁹ *China Defence Universities Tracker – Henan University of Science and Technology*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414154105/https://unitracker.aspi.org.au/universities/henan-university-of-science-and-technology/>.
- ¹³⁰ *China Defence Universities Tracker – Hefei University of Technology*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250629161712/https://unitracker.aspi.org.au/universities/hefei-university-of-technology/> (MEU status due to ties with Anhui Provincial National Defence Industry Office and Anhui Military Industry Group).
- ¹³¹ Ministry of Education of the People's Republic of China [中华人民共和国教育部], Hefei [合肥合作], (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/1874>.
- ¹³² *China Defence Universities Tracker – Guilin University of Electronic Science and Technology*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414154025/https://unitracker.aspi.org.au/universities/guilin-university-of-electronic-science-and-technology/> (state key lab performing defense research).
- ¹³³ Ministry of Education of the People's Republic of China [中华人民共和国教育部], University of Arkansas and Guilin University [阿肯色大学与桂林大学合作], (July 2, 2025), available at <https://web.archive.org/web/20240722190855/https://www.crs.jsj.edu.cn/aproval/detail/3131>.
- ¹³⁴ Ministry of Education of the People's Republic of China [中华人民共和国教育部], Portland Institute and Nanjing University [波特兰学院与南京大学合作], (July 2, 2025), available at <https://web.archive.org/web/20240721163901/https://www.crs.jsj.edu.cn/aproval/detail/2594>.
- ¹³⁵ *China Defence Universities Tracker – Nanjing University of Posts and Telecommunications*, Austl. Strategic Pol'y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250414154248/https://unitracker.aspi.org.au/universities/nanjing-university-of-posts-and-telecommunications/>.

-
- ¹³⁶ *China Defence Universities Tracker – Kunming University of Science and Technology*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250530063952/https://unitracker.aspi.org.au/universities/kunming-university-of-science-and-technology/> (MEU status due to CSIC collaboration).
- ¹³⁷ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Kunming University and University of Idaho [昆明大学与爱达荷大学合作], (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/2568>.
- ¹³⁸ *China Defence Universities Tracker – Kunming University of Science and Technology*, Austl. Strategic Pol’y Inst. (July 2, 2025), available at <https://web.archive.org/web/20250530063952/https://unitracker.aspi.org.au/universities/kunming-university-of-science-and-technology/> (MEU status due to CSIC collaboration).
- ¹³⁹ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Kunming University and University of Arkansas Fayetteville [昆明大学与阿肯色大学费耶特维尔分校合作], (July 2, 2025), available at <https://www.crs.jsj.edu.cn/aproval/detail/2426>.
- ¹⁴⁰ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Wenzhou University and Kean University [温州大学与基恩大学合作], (July 2, 2025), available at <https://web.archive.org/web/20240721164938/https://www.crs.jsj.edu.cn/aproval/detail/1116>.
- ¹⁴¹ Wenzhou Science & Technology Bureau [温州科学技术局], Publicity on the Proposed Projects of Wenzhou’s Major Scientific and Technological Innovation Projects in 2024 [2024年温州市重大科学技术创新项目拟定项目公示], (Aug. 28, 2024), available at <https://archive.ph/bTGqm> (Wenzhou University faculty member hosted the “Aerospace Materials and Technology Research Institute - National Defense Key Laboratory Fund Project” [航天材料及工艺研究所-国防科技重点实验室基金项目] from 2019 to 2021).
- ¹⁴² Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Southwestern University and University of Delaware [西南大学与特拉华大学合作], (July 2, 2025), available at <https://web.archive.org/web/20240715201046/https://www.crs.jsj.edu.cn/aproval/detail/2667>.
- ¹⁴³ *The School Signed a Cooperation Agreement with the Central Military Commission Logistics Support Department* [中央军委后勤保障部与学校签合作协议], (Apr. 24, 2024), available at <https://archive.ph/OLNs9> (establishment of the ‘Financial Talent Training Base’).
- ¹⁴⁴ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], Drake University and Qingdao University [德雷克大学与青岛大学合作], (July 2, 2025), available at <https://web.archive.org/web/20240715200513/https://www.crs.jsj.edu.cn/aproval/detail/3438>.
- ¹⁴⁵ Qingdao University of Science and Technology [青岛科技大学], Organizational Structure [组织结构] (archived June 25, 2025), <https://archive.is/JCX5Z> (identifying multiple State Key Laboratories); QUST Hosted Visits from U.S. Government-Blacklisted Chinese Aerospace Manufacturer COMAC [青岛科技大学与美国航空制造商COMAC访问] (Dec. 4, 2018), available at <https://archive.is/uoukt>.
- ¹⁴⁶ Ministry of Education of the People’s Republic of China [中华人民共和国教育部], North Alabama and Guizhou University [北阿拉巴马大学与贵州大学合作], (July 2, 2025), available at <https://web.archive.org/web/20240721211723/https://www.crs.jsj.edu.cn/aproval/detail/3012>.
- ¹⁴⁷ Guizhou University School of Mechanical Engineering [贵州大学机械工程学院], Scientific Research Platforms [科学研究平台], (archived Jun. 25, 2025), available at <https://archive.ph/CC9iX>.
- ¹⁴⁸ Letter, U.S. House of Reps. Select Comm. on the Strategic Competition Between the U.S. and the Chinese Communist Party to Dr. Mung Chiang, President, Purdue University (Mar. 19, 2025), available at <https://selectcommitteeontheccp.house.gov/media/letters/letter-dr-mung-chiang-president-purdue-university-transparency-universities-national>; Letter, U.S. House of Reps. Select Comm. on the Strategic Competition Between the U.S. and the Chinese Communist Party to Timothy Killeen, President, University of Illinois Urbana-Champaign (Mar. 19, 2025), available at <https://selectcommitteeontheccp.house.gov/media/letters/letter-dr-timothy-k-killeen-president-university-illinois-urbana-champaign>; Letter, U.S. House of Reps. Select Comm. on the Strategic Competition Between the U.S. and the Chinese Communist Party to Dr. Carol Folt, President, University of Southern California (Mar. 19, 2025); Letter, U.S. House of Reps. Select Comm. on the Strategic Competition Between the U.S. and the Chinese Communist Party to Darryll J Pines, President, University of Maryland (Mar. 19, 2025), available at

<https://selectcommitteeontheccp.house.gov/media/letters/letter-dr-darryll-j-pines-president-university-maryland-transparency-universities>; Letter, U.S. House of Reps. Select Comm. on the Strategic Competition Between the U.S. and the Chinese Communist Party to Dr. Jonathan Levin, President, Stanford University (Mar. 19, 2025), available at <https://selectcommitteeontheccp.house.gov/media/letters/letter-dr-jonathan-levin-president-stanford-transparency-universities-national>.

¹⁴⁹ The Select Committee on the CCP, CCP on the Quad: How American Taxpayers and Universities Fund the CCP's Advanced Military and Technological Research (Sept. 23, 2024), available at <https://selectcommitteeontheccp.house.gov/media/reports/ccp-quad-how-american-taxpayers-and-universities-fund-cpps-advanced-military-and->.

¹⁵⁰ Federal Student Aid, Section 117 Foreign Gift and Contract Reporting (May 15, 2023), available at <https://fsapartners.ed.gov/knowledge-center/topics/section-117-foreign-gift-and-contract-reporting>.

¹⁵¹ The White House, Transparency Regarding Foreign Influence at American Universities (April 2023 2025), available at <https://www.whitehouse.gov/presidential-actions/2025/04/transparency-regarding-foreign-influence-at-american-universities/>.

¹⁵² Federal Student Aid, Notices of Compliance Review and Records Requests (May 15, 2023), available at <https://fsapartners.ed.gov/knowledge-center/topics/section-117-foreign-gift-and-contract-reporting/resources/notices-compliance-review-and-records-requests>.

¹⁵³ Neetu Arnold, Shadows of Influence, National Association of Scholars (Sept. 29, 2024), available at <https://www.nas.org/reports/shadows-of-influence/full-report>.

¹⁵⁴ CCP on the Quad.

¹⁵⁵ Section 117 Foreign Gift.

¹⁵⁶ Section 117 Foreign Gift.

¹⁵⁷ Section 117 Foreign Gift.

¹⁵⁸ Section 117 Foreign Gift.

¹⁵⁹ Section 117 Foreign Gift.

¹⁶⁰ Section 117 Foreign Gift.

¹⁶¹ Section 117 Foreign Gift.

¹⁶² Section 117 Foreign Gift.

¹⁶³ Section 117 Foreign Gift.

¹⁶⁴ Section 117 Foreign Gift.

¹⁶⁵ Executive Office of the President, Transparency Regarding Foreign Influence at American Universities, Federal Register (April 28, 2025), available at <https://www.federalregister.gov/documents/2025/04/28/2025-07379/transparency-regarding-foreign-influence-at-american-universities>.

¹⁶⁶ U.S. Department of Education, U.S. Department of Education Returns Section 117 Foreign Funding Enforcement to Office of General Counsel, Announces Investigation into UC Berkeley (Apr. 25, 2025), available at <https://www.ed.gov/about/news/press-release/us-department-of-education-returns-section-117-foreign-funding-enforcement-office-of-general-counsel-announces-investigation-uc-berkeley>.

¹⁶⁷ U.S. Department of Education, U.S. Department of Education Initiates Records Request from Harvard University After Discovering Inaccurate Foreign Financial Disclosures (Apr. 18, 2025), available at <https://www.ed.gov/about/news/press-release/us-department-of-education-initiates-records-request-harvard-university-after-discovering-inaccurate-foreign-financial-disclosures>.

¹⁶⁸ U.S. Department of Education, U.S. Department of Education Returns Section 117 Foreign Funding Enforcement to Office of General Counsel, Announces Investigation into UC Berkeley (Apr. 25, 2025), available at <https://www.ed.gov/about/news/press-release/us-department-of-education-returns-section-117-foreign-funding-enforcement-office-of-general-counsel-announces-investigation-uc-berkeley>.

¹⁶⁹ U.S. Department of Education, U.S. Department of Education Opens Foreign Funding Investigation into University of Pennsylvania After Discovering Inaccurate and Untimely Foreign Financial Disclosures (May 8, 2025), available at <https://www.ed.gov/about/news/press-release/us-department-of-education-opens-foreign-funding-investigation-university-of-pennsylvania-after-discovering-inaccurate-and-untimely-foreign-financial>.

¹⁷⁰ ¹⁷⁰ U.S. Department of Education, Notice of 20 U.S.C. §1011f Investigation and Records Request (Jul. 15, 2025), available at <https://fsapartners.ed.gov/sites/default/files/2025-07/universityofmichigansection117investigationletterjuly2025.pdf>.

¹⁷¹ The White House, Transparency Regarding Foreign Influence

At American Universities (Apr. 23, 2025), available at <https://www.whitehouse.gov/presidential-actions/2025/04/transparency-regarding-foreign-influence-at-american-universities/>.

¹⁷² The White House, Transparency Regrading Foreign.

¹⁷³ American Council on Education, Few Changes Expected to Federal Foreign Gift and Contract Reporting Requirements (May 15, 2023), available at <https://www.acenet.edu/News-Room/Pages/Few-Changes-Expected-Section-117.aspx>.

¹⁷⁴ U.S. Department of Education, U.S. Department of Education Returns Section 117 Foreign Funding Enforcement to Office of General Counsel, Announces Investigation into UC Berkeley (Apr. 25, 2025), available at <https://www.ed.gov/about/news/press-release/us-department-of-education-returns-section-117-foreign-funding-enforcement-office-of-general-counsel-announces-investigation-uc-berkeley>.

¹⁷⁵ The White House, Presidential Memorandum on United States Government-Supported Research and Development National Security Policy (Jan. 14, 2021), available at <https://trumpwhitehouse.archives.gov/presidential-actions/presidential-memorandum-united-states-government-supported-research-development-national-security-policy/>.

¹⁷⁶ U.S. Department of Education, U.S. Department of Education, Federal Partners Issue Guidance to Help Colleges and Universities Mitigate Foreign Threats to Research (Aug. 25, 2025), available at <https://www.ed.gov/about/news/press-release/us-department-of-education-federal-partners-issue-guidance-help-colleges-and-universities-mitigate-foreign-threats-research>.

¹⁷⁷ U.S. Department of Education, U.S. Department of Education Initiates Records Request from Harvard University After Discovering Inaccurate Foreign Financial Disclosures (Apr. 18, 2025), available at <https://www.ed.gov/about/news/press-release/us-department-of-education-initiates-records-request-harvard-university-after-discovering-inaccurate-foreign-financial-disclosures>.

¹⁷⁸ U.S. Department of Education Initiates Records Request from Harvard University After Discovering Inaccurate Foreign Financial Disclosures.

¹⁷⁹ U.S. Department of Education Returns Section 117 Foreign Funding Enforcement to Office of General Counsel, Announces Investigation into UC Berkeley.

¹⁸⁰ U.S. Department of Education Returns Section 117 Foreign Funding Enforcement to Office of General Counsel, Announces Investigation into UC Berkeley.

¹⁸¹ CCP on the Quad.

¹⁸² U.S. Department of Education Opens Foreign Funding Investigation into University of Pennsylvania After Discovering Inaccurate and Untimely Foreign Financial Disclosures (May 8, 2025), available at <https://www.ed.gov/about/news/press-release/us-department-of-education-opens-foreign-funding-investigation-university-of-pennsylvania-after-discovering-inaccurate-and-untimely-foreign-financial>.

¹⁸³ Notice of 20 U.S.C. §1011f.

¹⁸⁴ Notice of 20 U.S.C. §1011f.

¹⁸⁵ U.S. Department of Education, Letter to Alan Garber, President of Harvard University on file with the Committee on Education and Workforce (April 17, 2025), available at <https://www.ed.gov/about/news/press-release/us-department-of-education-initiates-records-request-harvard-university-after-discovering-inaccurate-foreign-financial-disclosures>.

¹⁸⁶ U.S. Department of Education, Notice of 20 U.S.C. §1011f Investigation and Records Request (Jul. 15, 2025), available at <https://fsapartners.ed.gov/sites/default/files/2025-07/universityofmichigansection117investigationletterjuly2025.pdf>.

¹⁸⁷ <https://fsapartners.ed.gov/sites/default/files/2025-07/universityofmichigansection117investigationletterjuly2025.pdf>

¹⁸⁸ <https://fsapartners.ed.gov/sites/default/files/2025-07/universityofmichigansection117investigationletterjuly2025.pdf>

¹⁸⁹ House - Education and Workforce, H.R.1048 - DETERRENT Act, Congress.gov (Feb. 6, 2025), available at <https://www.congress.gov/bill/119th-congress/house-bill/1048/cosponsors>

¹⁹⁰ All Actions: H.R.1048 — 119th Congress (2025-2026), available at <https://www.congress.gov/bill/119th-congress/house-bill/1048/all-actions?overview=closed#tabs>.

¹⁹¹ All Actions: H.R.1048 — 119th Congress.

¹⁹² All Actions: S.1296 — 119th Congress (2025-2026), Congress.gov, available at <https://www.congress.gov/bill/119th-congress/senate-bill/1296/all-actions?overview=closed#tabs>.