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Model
Legislation

Model Legislation to Track Foreign Funds to American Universities

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Introduction

In September 2024, the House Education and Workforce Committee and the House Select Committee on the Chinese Communist Party uncovered a troubling fact: federal agencies had inadvertently bolstered China’s military capabilities by funding researchers affiliated with American universities who partnered with Chinese universities.¹ These research partnerships were also funded by defense- and security-linked Chinese universities and Chinese corporations, such as Huawei.² While the partnerships were framed as academic cooperation, American researchers transferred sensitive knowledge on military technologies, including high-performance explosives and drone-targeting systems—knowledge that was developed with funding from the U.S. Department of Defense. Blacklisted Chinese companies like Huawei disguised their funding by channeling money to American universities through intermediaries. The U.S. government lacked visibility into many of these collaborations because the universities involved had failed to report the funds, as required by federal law.³

This situation highlights the key challenge that opponents of foreign influence face: foreign influence operates in the shadows, allowing malicious actors to disguise their true intentions as genuine intellectual exchange. The implications extend beyond China. Qatar, which heavily restricts press freedoms in its own country, has funded professorships at Northwestern University in journalism, communications, and Middle East studies, among others.⁴ Universities such as Harvard and Georgetown have accepted multimillion-dollar donations from Arab countries to establish Middle East studies centers, which promote curricula that align with their geopolitical agendas.⁵ Transparency is essential to expose influence campaigns from adversarial foreign actors.

In recent years, the discussion of what to do about foreign influence on campus has centered on Section 117 of the Higher Education Act, which requires universities to disclose foreign funding to the Department of Education (ED).⁶ Reformers have pointed out that Section 117 does not include adequate enforcement provisions and that it excludes critical information on foreign funds, such as the purpose of the funds and the donor name.⁷

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Improving Section 117 is an important task, though typical partisan gridlock now characteristic of Congress has stymied reform efforts. In the meantime, states committed to monitoring potentially harmful foreign funding can implement more effective measures than the federal government by establishing their own reporting requirements. Some states already have done so, often in long-forgotten laws passed decades ago. But in the past four years, at least six states have passed new university foreign funds disclosure laws, demonstrating renewed interest in addressing malign foreign influence in higher education.

This brief provides the first comprehensive overview of the existing state-level foreign funds disclosure laws applicable to universities. State foreign disclosure laws can and do offer several key improvements over the current federal disclosure standards. However, there is significant variation: many states' disclosure laws could be significantly improved by matching or exceeding the standards set by the most comprehensive state laws. In addition, most states do not have any such law. The key improvements that foreign disclosure laws at the state level can make, relative to federal disclosure laws include:

- Lower reporting thresholds
- Make donor names public
- Consistently report the purpose of the gift
- Define enforcement mechanisms and penalties
- Provide clear definitions of university-affiliated organizations

The model legislation presented in this brief improves laws already adopted by states by suggesting language to implement these recommendations. If states enact laws that include these provisions, the loopholes that malign foreign actors repeatedly exploit to avoid disclosure of their funding campaigns would close. While these laws will not stop foreign funds entirely, they subject universities to public accountability for the relationships that they enter with foreign actors.

Background: Growing Concern over Foreign Influence and Espionage

Section 117 of the Higher Education Act requires universities to report all foreign contributions worth at least \$250,000 per calendar year. This provision was introduced in the 1986 Higher Education Act amendments and was driven by lawmakers' growing concerns about foreign influence, particularly from Arab governments. Libya, Oman, and the United Arab Emirates, for example, funded various academic chairs and helped establish Georgetown University's Center for Contemporary Arab Studies in 1975.⁸ Concurrently, several states enacted their own transparency laws: New York (1984), Missouri (1985), Michigan (1986), Pennsylvania (1986), and New Jersey (1987).⁹

Despite these regulations, universities often avoided reporting foreign funds because of lax enforcement at the federal level. Foreign influence proliferated into the 2000s. Confucius Institutes, which serve as propaganda tools for the Chinese government, took hold at American campuses.¹⁰ A handful of universities entered lucrative, multimillion-dollar contracts with Qatar to establish



branch campuses.¹¹ After lawmakers and the public's concerns about Chinese espionage and the theft of research from American universities intensified,¹² the Trump administration investigated several universities regarding their foreign fund disclosures. In a 2020 report, the administration revealed that universities failed to report over \$6.5 billion in funds from countries such as China, Qatar, and Saudi Arabia.¹³

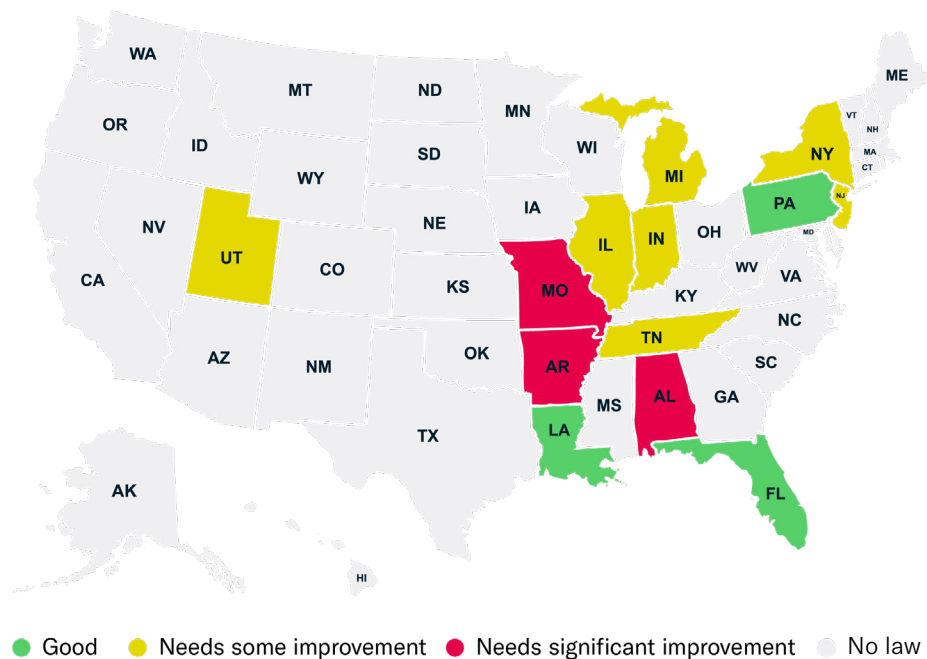
Following these investigations and heightened concerns regarding foreign influence, particularly from China, lawmakers made foreign funds transparency a higher priority. At the federal level, the CHIPS and Science Act of 2022 (Section 10339B) requires National Science Foundation (NSF) recipients to report any foreign contributions of \$50,000 or more from foreign adversaries.¹⁴ More states also adopted transparency laws: Arkansas (2021), Florida (2021), Tennessee (2021), Indiana (2022), Louisiana (2023), and Alabama (2024).

The Landscape: State Foreign Funds Disclosure Laws

Today, 13 states have foreign funds disclosure laws for universities (**Figure 1**).

Figure 1

State-Level University Foreign Funds Disclosure Laws, by Strength



Note: The color-coded system ranks states from best to worst, highlighting states that need to improve their laws and those that could serve as models. See the Appendix for methodology.

While much attention is often directed toward elite universities on the coasts, other states have also attracted significant amounts of foreign funding. In the early 1990s, the Saudi Arabian government donated \$21.5 million to the University of Arkansas to establish the King Fahd Center for Middle



East and Islamic Studies.¹⁵ More recently, public universities in North Carolina, South Carolina, and Texas failed to report millions received from ByteDance, the parent company of TikTok, for race-based scholarships.¹⁶ Administrators at Idaho State University overlooked the poor performance of students funded by Kuwait and Saudi Arabia, as students from these countries paid the significantly higher out-of-state tuition costs.¹⁷ Foreign funding is not only affecting elite institutions; it is also reshaping state colleges across the country.

By lowering the foreign funds reporting threshold, state laws provide the public with higher-quality information regarding foreign contributions. Section 117's threshold of \$250,000 overlooks significant contributions, such as a \$125,000 contract between the University of Maryland and the Chinese tech company Alibaba on surveillance research.¹⁸

Additionally, Section 117 does not consistently disclose donor names or the intended purpose of contributions. The public must know who is funding our universities and their interests in doing so. There is a significant difference between a foreign adversary supporting an academic professorship and a foreign ally funding cancer research.

State-level laws should clarify that funds that pass through university-affiliated organizations must be reported. Universities have sometimes claimed that they are not required to report contributions routed through their foundations, citing the legal separation of these entities from educational institutions, even when the funds support university activities.¹⁹ This lack of transparency is compounded by public records exemptions for university foundations. As a result, the federal government has not fully captured the extent of foreign funding entering American universities. Texas A&M University, which was under investigation for lax reporting during the Trump administration, concealed at least \$100 million from Qatar and Russia.²⁰ These funds were funneled through state agencies associated with the university system but not classified as universities, thereby avoiding federal scrutiny. The majority of the funds originated from Qatar and were meant to help the country advance in a variety of areas—from oil recovery to cybersecurity.²¹

As **Table 1** shows, many state laws implement stronger enforcement mechanisms than the federal government (see the Appendix for a detailed evaluation of each state's law). Section 117 requires universities to pay enforcement costs to the government if the U.S. succeeds in its legal action for misreporting. Several states impose clearly defined penalties for reporting failures that would make universities feel the pain for failure to follow the law. Some states, like Florida, mandate annual audits to ensure compliance. Such measures place universities on heightened alert, promoting improved adherence to transparency standards.

The main weakness of certain state laws is that they introduce additional restrictions on which funds must be reported. Section 117 uses a broad definition of reportable foreign contributions, requiring universities to report funds from any foreign entity based in any foreign country, regardless of whether it is a government or some other institution.²² Some state laws restrict reportable foreign funds to those from so-called countries of concern, a curated list of adversarial countries such as China and Iran. Missouri, unique in this respect, requires funds to be reported only if the associated contract includes a stipulation that would require the university to violate antidiscrimination laws.



Table 1

Overview of State Transparency Laws on Foreign Funds

State	Threshold (\$)	Must Disclose Donor Names	Must Disclose Gift's Purpose	Applies to Private Universities	Penalty for Noncompliance	Disclosure Reports Available Online	Restricts Disclosure Conditions
Alabama ²³	50K			X			Foreign adversaries/ NSF recipients only
Arkansas ²⁴	250K					X	
Florida ²⁵	50K	X	X		X		
Illinois ²⁶	100K– public, 250K– private	X	X	X			
Indiana ²⁷	No threshold	X	X			X	Foreign adversaries only
Louisiana ²⁸	50K	X	X	X	X		Foreign adversaries only
Michigan ²⁹	100K	X	X		X		
Missouri ³⁰	100K	X	X				Antidiscrimination violations only
New Jersey ³¹	100K	X	X	X			
New York ³²	100K	X	X	X			
Pennsylvania ³³	100K	X	X	X	X		
Tennessee ³⁴	10K	X	X			X	
Utah ³⁵	50K	X	X			X	

Note: The color-coded system ranks states from best (green) to worst (red), highlighting states that need to improve their laws and those that could serve as models.

States should generally adopt a broad definition of reportable foreign funds similar to Section 117, to avoid malign foreign actors and universities taking advantage of loopholes such as routing funds from one country to another to avoid reporting requirements.



Model Legislation

The language in this model legislation improves laws already adopted by states by requiring universities to file disclosure reports in a digital spreadsheet format and to ensure that state governments make disclosure reports available online. These requirements would reduce the burden on public records offices and enhance public access to important information.

Section I. Purpose

The purpose of this act is to provide transparency into the sources of foreign funding to higher-education institutions.

Section II. Definitions

A. As used in this chapter, the term:

1. “Affiliate organization” means any entity under the direct or indirect control of, or established for the benefit of, an organization required to report under this Section, including a direct-support organization.
2. “Contract” means any agreement for the acquisition by purchase, lease, or barter of property or services by a foreign source for the direct benefit or use of any of the parties, and any purchase, lease, or barter of property or services from a foreign adversary.
3. “Foreign adversary” means any foreign government or foreign nongovernment person determined by the United States secretary of commerce or state secretary of state to have engaged in a long-term pattern or serious instances of conduct significantly adverse to the national security of the United States or security and safety of United States persons as listed in 15 CFR 7.4, Determination of Foreign Adversaries, as amended or renumbered.³⁶
4. “Foreign government” means the government or an agent of any nation or group of nations, or any province or other political subdivision of any country or nation, other than the government of the United States and its states or political subdivisions.
5. “Foreign source” means any of the following:
 - a. A foreign government or an agency of a foreign government
 - b. A legal entity, governmental or otherwise, created solely under the laws of a foreign nation, or group of nations
 - c. An individual who is not a citizen of the United States or of a territory or protectorate of the United States
 - d. An agent, including a subsidiary or an affiliate of a foreign legal entity, acting on behalf of any source defined in Subparagraph (a), (b), or (c) of this Paragraph
6. “Gift” means any contract, gift, grant, endowment, award, scholarship, or donation of money or property of any kind, or any combination thereof, including a conditional or an unconditional pledge of a contract, gift, grant, endowment, award, scholarship, or donation.



Model Legislation to Track Foreign Funds to American Universities

This includes, but is not limited to, tuition payments made on behalf of individual students by foreign sources. For purposes of this Paragraph, the term “pledge” means a promise, agreement, or an expressed intention to give a thing of value.

7. “Postsecondary education institution” or “Institution” means a college or university, a nonpublic postsecondary institution, and/or any other entity offering a program of postsecondary education that has a physical presence in the state and is required to report foreign gifts or contracts pursuant to 20 U.S.C. 1011f,³⁷ or an affiliate or partner organization of any such college, university, institution, or school.

Section III. Reporting Requirements

- A. Each Institution shall report any gift received directly or indirectly from a foreign source with a value of \$50,000 or more. The report shall be submitted annually by September 1 for gifts made between August 1 and July 31 of the immediately preceding academic year. The Institution shall include in its report gifts received by all affiliate organizations of the Institution.
- B. If a foreign source provides more than one gift directly or indirectly to an Institution and its affiliate organizations in a single calendar year and the total value of all gifts is \$50,000 or more, then all gifts received from that foreign source shall be reported.
 1. For purposes of this Paragraph, a gift received from a foreign source through an intermediary shall be considered an indirect gift to the Institution.
- C. A report required under this Subsection shall be made to the following entities:
 1. The Institution’s board of supervisors, trustees, or other governing board.
 2. Unless already reported by the Institution’s board of supervisors, an annual summary of the gifts shall be filed with the Board of Regents for any Institution or affiliate organization of the Institution.
- D. Reports of gifts subject to the requirements of this Section shall include the following information, unless the information is exempt from disclosure under the provisions of this Section or otherwise prohibited or deemed confidential under federal or state law:
 1. The amount of the gift
 2. The date the gift was received
 3. The contract start and end date, if the gift is a contract
 4. The name of the foreign source and, if not a foreign government, the country of citizenship, if known, and the country of principal residence or domicile of the foreign source, except the names of payers of tuition that are not corporate entities that provide tuition assistance for individual students
 5. The purpose of the gift
- E. The listing of information pursuant to this Subsection shall be submitted in a digital spreadsheet with a searchable or sortable format.



Section IV. Enforcement

- A. An Institution shall submit a copy of any gift agreement between the foreign source and the Institution, signed by the foreign source and the chief administrative officer of the Institution, or their respective designees, which includes a detailed description of the purpose for which the gift is to be used by the Institution, the identification of the persons whom the gift is explicitly intended to benefit, and any applicable conditions, requirements, restrictions, or terms made a part of the gift regarding the control of curricula, faculty, student admissions, student fees, or contingencies placed upon the Institution to take a specific public position or to award an honorary degree. If an agreement contains information protected from disclosure, an abstract and redacted copy of the disclosure containing information that is not protected shall be submitted in lieu of a copy of the agreement.
- B. The internal auditor of the Board of Regents, or an authorized designee, shall biannually inspect or audit a random sample of at least 10% of Institutions, including Institutions that did not submit any disclosure report under this Section, to determine the Institution's compliance with the requirements of this Section.
- C. Upon request by the governor, the president of the Senate, or the speaker of the House of Representatives, the internal auditor of the Board of Regents shall inspect or audit a gift or gift agreement.
- D. A disclosure report required by this Section is a public record open to inspection. The state Department of Education shall make disclosure reports available on its website in a digital spreadsheet format.
- E. In the absence of enforcement by the Board of Governors or the state Board of Education, as applicable, the attorney general or the chief financial officer may bring a civil action to enforce this Section. If such action is successful, the attorney general or the chief financial officer, as applicable, is entitled to reasonable attorney fees and costs.

Section V. Penalty

- A. An Institution that knowingly, willfully, or negligently fails to disclose the information required in this Section shall be subject to a civil penalty of:
 - 1. 105% of the amount of the undisclosed gift, payable only from nonstate funds of the Institution or the affiliate organization that received the gift
 - 2. 150% of the amount of the undisclosed gift, if the undisclosed amount originated from a foreign adversary
- B. All recovered funds shall be deposited into the state general fund.

Section VI. Severability

The provisions of this act are hereby declared to be severable. If any provision of this act or the application of such provision to any person or circumstance is declared or held to be invalid for any reason, such declaration or holding shall not affect the validity of the remaining portions of this act and the application of its provisions to any other Institutions, persons, or circumstances.



Appendix

I evaluated the effectiveness of state laws by assigning points based on specific criteria. States received up to five points for complying with each of the following categories: (1) disclosed donor names; (2) specified the purpose of gifts; and (3) imposed penalties for noncompliance. Next, states could earn up to three points if their reporting thresholds were below \$50,000 per year; higher thresholds received fewer points. States were also rewarded up to three points if they conducted regular audits. States were awarded one point each for making reports accessible online and including private universities in disclosure requirements. States without restrictions on fund disclosure received a maximum of 10 points, while those with any restrictions lost points, as such limitations undermine the law’s effectiveness. Therefore, the maximum number of points that any state can receive is 33 points.

Table A-1

Detailed Description and Score of State Disclosure Laws

Green: > 25 points, Yellow: 15–25 points, Red: < 15 points

State	Key Features	Weaknesses	Score
Alabama	<ul style="list-style-type: none"> - Definition for “country of concern” includes Qatar 	<ul style="list-style-type: none"> - Limited to universities that receive funds from “countries of concern” - Reporting requirements indistinguishable from federal laws - No enforcement mechanisms 	8
Arkansas	<ul style="list-style-type: none"> - Requires disclosure reports on a fiscal year basis, reducing workload - Disclosure reports available online 	<ul style="list-style-type: none"> - Reporting requirements indistinguishable from Section 117 - Relies on universities to assess harmful contracts - Limited to state universities - No enforcement mechanisms 	11
Florida	<ul style="list-style-type: none"> - Low reporting threshold - 105% penalty for disclosure failure - Regular audits to check institutional compliance - Clarifies that attorney general can pursue legal action if enforcement is not followed 	<ul style="list-style-type: none"> - Limited to state universities - Should make data available online 	30
Illinois	<ul style="list-style-type: none"> - Affects public and private universities - Low reporting threshold for public universities 	<ul style="list-style-type: none"> - Reporting threshold for private universities indistinguishable from Section 117 - No enforcement mechanisms 	22



Model Legislation to Track Foreign Funds to American Universities

Indiana	<ul style="list-style-type: none"> - No reporting threshold - Disclosure reports available online 	<ul style="list-style-type: none"> - No penalty - Audits are optional - Limited to state universities - Limited to universities that receive funds from foreign adversaries as defined by 15 CFR 7.4 and Indiana Code 1-1-16-8³⁸ 	21
Louisiana	<ul style="list-style-type: none"> - Affects public and private universities - Low reporting threshold - 105% penalty for disclosure failure - Regular audits to check institutional compliance 	<ul style="list-style-type: none"> - Limited to universities that receive funds from foreign adversaries as defined and amended by 15 CFR 7.4, Determination of Foreign Adversaries 	26
Michigan	<ul style="list-style-type: none"> - Low reporting threshold - 5% penalty per grant or contract not reported 	<ul style="list-style-type: none"> - Limited to state universities - Penalty is too low 	23
Missouri	<ul style="list-style-type: none"> - Low reporting threshold 	<ul style="list-style-type: none"> - No data because disclosure applies only if schools enter contracts that violate antidiscrimination laws - Limited to state universities - No enforcement mechanisms 	11
New Jersey	<ul style="list-style-type: none"> - Affects public and private universities - Low reporting threshold 	<ul style="list-style-type: none"> - No enforcement mechanisms 	22
New York	<ul style="list-style-type: none"> - Affects public and private universities - Low reporting threshold 	<ul style="list-style-type: none"> - No enforcement mechanisms 	22
Pennsylvania	<ul style="list-style-type: none"> - Affects public and private universities - Low reporting threshold - 105% penalty for nondisclosure 	<ul style="list-style-type: none"> - Strengthen enforcement by clarifying that the state attorney general can pursue legal action if enforcement is not followed - Require audits 	27
Tennessee	<ul style="list-style-type: none"> - Low reporting threshold - Disclosure reports required online 	<ul style="list-style-type: none"> - Limited to state universities - Relies on universities to assess harmful contracts - No enforcement mechanisms 	24
Utah	<ul style="list-style-type: none"> - Low reporting threshold - Although not legally required, Utah makes disclosure reports available online 	<ul style="list-style-type: none"> - Limited to state universities - No enforcement mechanisms 	23



Table A-2

Foreign Funds to Select American Universities, by State

School	State	Amount (Sec 117)
University of Alaska-Southeast	AK	841,646
Auburn University	AL	7,540,509
University of Alabama	AL	109,623,809
University of Arkansas	AR	134,309,032
Arizona State University	AZ	390,758,650
University of Arizona	AZ	261,389,060
Stanford University	CA	1,325,689,865
University of California-Berkeley	CA	790,558,357
University of California-Los Angeles	CA	563,791,862
Colorado School of Mines	CO	111,503,196
University of Colorado-Boulder	CO	574,245,566
University of Connecticut	CT	9,428,768
Yale University	CT	1,224,028,550
University of Delaware	DE	111,810,432
Florida State University	FL	1,199,927
University of Florida	FL	119,646,276
University of Miami	FL	267,535,471
Emory University	GA	112,225,502
Georgia Institute of Technology	GA	121,110,022
University of Georgia	GA	27,378,228
University of Hawaii at Manoa	HI	41,752,551
University of Iowa	IA	363,866,580
University of Northern Iowa	IA	5,661,253
University of Idaho	ID	689,549,131
Northwestern University	IL	914,496,134
University of Illinois at Urbana-Champaign	IL	232,410,079
Indiana University-Bloomington	IN	169,776,303
Purdue University	IN	216,490,164



Model Legislation to Track Foreign Funds to American Universities

School	State	Amount (Sec 117)
Kansas State University	KS	66,453,496
University of Kansas	KS	80,497,845
University of Kentucky	KY	97,427,233
University of Louisville	KY	79,640,245
Louisiana State University	LA	4,750,823
Tulane University	LA	45,245,861
Harvard University	MA	2,683,746,841
Massachusetts Institute of Technology	MA	1,775,026,006
University of Massachusetts-Amherst	MA	5,562,641
University of Maryland-Baltimore	MD	46,751,866
University of Maryland-College Park	MD	50,443,819
University of Maine	ME	1,844,690
Michigan State University	MI	144,352,140
University of Michigan	MI	74,970,007
Mayo Clinic College of Medicine and Science	MN	92,227,476
University of Minnesota-Twin Cities	MN	281,608,469
University of Missouri-Columbia	MO	71,629,146
Washington University in St. Louis	MO	121,209,422
Mississippi State University	MS	3,295,502
University of Mississippi	MS	886,454
Montana State University-Bozeman	MT	5,660,233
Duke University	NC	722,112,203
North Carolina State University	NC	58,969,604
University of North Carolina-Chapel Hill	NC	96,354,824
North Dakota State University-Fargo	ND	7,608,685
University of North Dakota	ND	64,639,992
University of Nebraska-Omaha	NE	12,030,310
University of Nebraska-Lincoln	NE	5,085,079
Dartmouth College	NH	107,727,732
University of New Hampshire	NH	18,152,322
Princeton University	NJ	375,457,193



Model Legislation to Track Foreign Funds to American Universities

School	State	Amount (Sec 117)
Rutgers, the State University of New Jersey	NJ	241,149,370
New Mexico State University	NM	12,961,402
University of New Mexico	NM	10,392,987
University of Nevada-Las Vegas	NV	19,737,548
University of Nevada-Reno	NV	9,373,949
Columbia University	NY	1,011,058,815
Cornell University	NY	2,437,890,551
SUNY-Stony Brook	NY	11,094,906
Case Western Reserve University	OH	207,043,029
Ohio State University	OH	167,733,794
Ohio University	OH	65,670,595
Oklahoma State University	OK	38,540,119
University of Oklahoma	OK	81,977,552
Oregon Health and Sciences University	OR	82,983,260
Oregon State University	OR	84,969,867
Carnegie Mellon University	PA	2,630,307,794
Pennsylvania State University	PA	571,868,165
University of Pennsylvania	PA	1,876,777,000
Brown University	RI	144,735,024
University of Rhode Island	RI	7,357,909
Clemson University	SC	44,119,561
University of South Carolina-Columbia	SC	20,706,018
South Dakota State University	SD	948,870
University of South Dakota	SD	1,000,000
University of Tennessee	TN	42,979,058
Vanderbilt University	TN	169,829,935
Texas A&M University	TX	840,768,696
Texas Tech University	TX	47,879,818
University of Texas at Austin	TX	470,997,141
Rice University	TX	212,125,278
Brigham Young University	UT	765,634,853



Model Legislation to Track Foreign Funds to American Universities

School	State	Amount (Sec 117)
University of Utah	UT	12,053,763
George Mason University	VA	170,350,820
University of Virginia	VA	325,825,898
Virginia Commonwealth University	VA	305,174,839
University of Vermont	VT	16,591,704
University of Washington-Seattle	WA	259,765,401
Washington State University	WA	186,288,609
University of Wisconsin-Madison	WI	170,063,984
University of Wisconsin-Milwaukee	WI	10,876,974
West Virginia University	WV	116,823,165
University of Wyoming	WY	4,425,711



Endnotes

- ¹ House Select Committee on the Chinese Communist Party, “CCP on the Quad: How American Taxpayers and Universities Fund the CCP’s Advanced Military and Technological Research,” September 2024.
- ² Lawrence Bonk, “Huawei Has Been Secretly Funding Research in America After Being Blacklisted,” *engadget*, May 2, 2024.
- ³ Neetu Arnold, “Shadows of Influence,” National Association of Scholars (NAS), Sept. 29, 2024.
- ⁴ Northwestern University, “Qatar Foundation to Provide Funding for Three Endowed Professorships,” Oct. 25, 2010.
- ⁵ Neetu Arnold, “Hijacked: The Capture of America’s Middle East Studies Centers,” NAS, Sept. 27, 2022.
- ⁶ U.S. Dept. of Education, “Section 117 Foreign Gift and Contract Reporting.”
- ⁷ Dan Currell, “China’s Overseas Influence and Interference Activities,” May 23, 2023; Dan Lips, “Foreign Influence in Higher Education,” Foundation for American Innovation, May 2, 2024; Paul R. Moore, “Exposing the Dangers of the Influence of Foreign Adversaries on College Campuses,” July 13, 2023.
- ⁸ Arnold, “Hijacked.”
- ⁹ Other states included Connecticut, Florida, Texas, and Virginia. We exclude these states in the main body because they were subsequently repealed. See Will Maslow, “Education Act Would Curb Foreign Gifts,” *New York Times*, Oct. 16, 1986.
- ¹⁰ Rachele Peterson, “Outsourced to China,” NAS, Apr. 5, 2017.
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- ¹² Federal Bureau of Investigation, “China: The Risk to Academia,” 2019.
- ¹³ U.S. Dept. of Education, “Institutional Compliance with Section 117 of the Higher Education Act of 1965,” October 2020.
- ¹⁴ National Science Foundation, “About Foreign Financial Disclosure Report,” accessed Sept. 27, 2024.
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- ¹⁶ Neetu Arnold, “TikTok’s Secret Effort to Influence American Higher Education,” *National Review*, Sept. 25, 2023.
- ¹⁷ Stephanie Saul, “The Mideast Came to Idaho State. It Wasn’t the Best Fit,” *New York Times*, Mar. 21, 2016.



Model Legislation to Track Foreign Funds to American Universities

- ¹⁸ Yuichiro Kakutani, “Star American Professor Masterminded a Surveillance Machine for Chinese Big Tech,” *Daily Beast*, Aug. 22, 2022.
- ¹⁹ Goldie Blumenstyk, “Unlisted Foreign Donations,” *Chronicle of Higher Education*, Mar. 16, 1994; Neetu Arnold, “How Did a Virginia University Hide a Multimillion Dollar Donation from Turkey?” *RealClearEducation*, Nov. 1, 2021.
- ²⁰ Neetu Arnold, “Texas A&M’s Unreported Foreign Funding,” *Wall Street Journal*, June 17, 2022.
- ²¹ Applicants for Qatar National Research Fund grants must explain how projects will advance Qatar National Vision priorities; see “Qatar National Research Program.”
- ²² Federal and state laws require universities to report foreign funds from any source (government, private entities, etc.). This includes student tuition sponsored by foreign governments. There has been some confusion about whether foreign government–sponsored tuition should be reported by universities. My model legislation further clarifies that tuition from foreign governments should be reported. Authoritarian foreign countries have used sponsored tuition grants to spy on their students, silence them from criticizing their host country, and intimidate them into compliance with their political agendas. See Neetu Arnold, “The Takeover: Foreign Students and Money in American Universities,” *Tablet*, Febr. 26, 2024.
- ²³ Ala. Code § 16.
- ²⁴ Transparency in Foreign Investment—Act 1020 of 2021.
- ²⁵ Florida Education Statutes 1010.25.
- ²⁶ 105 ILCS 5/30-15.25.
- ²⁷ HB 1179 replaced SEA 388—Foreign Gift Reporting, passed in 2022.
- ²⁸ RS 17:1826.2.
- ²⁹ Michigan Compiled Laws, § 390.1231.
- ³⁰ Missouri Revisor of Statutes, 173.275.
- ³¹ NJ Rev Stat § 18A:3-19.2.
- ³² New York Education Law, § 207-a.
- ³³ 24 P.S. 6301-6307.
- ³⁴ Public Chapter 344 (2021).
- ³⁵ H.B. 114 Disclosure of Donations to Higher Education Institutions.
- ³⁶ 15 Code of Federal Regulations (CFR) 7.4.
- ³⁷ 20 U.S. Code § 1011f.
- ³⁸ Indiana Code Title 1. General Provisions § 1-1-16-8.