

# Risk Matrix Reference Guide

How to use this tool  
This guide is designed to provide a quick visual of federal agency risk factors used to assess fundamental research proposals and mitigation decisions and how the factors align and differ. Use cases will vary, but may include: pre-award and proposal reviews, hiring reviews, researcher education, detailing degrees of identified risk as part of a research security assessment process, internal risk matrix creation, and more.

Perspectives on Risk  
Each agency views risk differently. Color coding has been provided, where possible, to delineate between possible degrees of severity.

Prohibited Activity  
 Mitigation Required  
 Mitigation Expected/Recommended  
 Mitigation Suggested  
 Co-authorship  
**BLUE** Blue type indicates commonalities between agencies

## Step 1 Select the Funding Agency

1

The United States Government is a major funding source for research. The agencies below are among the largest U.S. Government funding sources. Each agency operates independently of the others and provides guidance as to how to navigate elements of risk that may be present within a proposal.

## Step 2 Evaluate the Factors

2

Each funding agency views risk slightly differently, and their categorization of risk differs accordingly. Use the information found in this reference guide to evaluate specific areas of risk surrounding your use case.

## Step 3 Understand the Degree of Risk Involved

3

Depending upon the factor and degree of risk involved a funding agency may require specific mitigation methods to ensure both researchers and the research are protected.

## Step 4 Formulate a Plan

4

Each research organization is different. How you choose to move forward depends upon a variety of factors, including your organization's risk appetite and capabilities of dealing with risk in general.

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### Factor 1

Foreign Talent Recruitment Programs

### Factor 2

Foreign Funding Sources

### Factor 3

Patents

### Factor 4

U.S. Restricted Lists

### Critical Technologies

### Process

#### Department of Defense (DoD)

DoD Matrix: [June 29, 2023, amended May 9, 2025 and March 9, 2026 \(current version\)](#)

#### Considers Risk of:

- Funding the Project
- Possible loss of "IP", including pre-published or patented information



View DoD policies, guidelines & resources  
<https://tinyurl.com/ysbzweyt>

Within the past 5 years

**Prohibited:** Indicators of the covered individual actively participating in a malign foreign talent recruitment program (MFTRP).

**Mitigation required** if, within the past 5 years, there are indicators of participation in an MFTRP by the covered individual or their co-authors on science and engineering (S&E) journal publications

**Mitigation required** if, within the past 5 years, there are indicators that the covered individual received funding from a Foreign Country of Concern (FCOC) or Foreign Entity of Concern.

**Mitigation required** if, within the past 5 years, patent applications or patents that resulted from research funded by the U.S. Government (USG) were filed in an FCOC or on behalf of an FCOC-connected entity, prior to filing in the U.S., or in non-FCOC and not disclosed, or involving patent or co-patent applications with an individual affiliated with any entity on Prohibited Entity Lists at the time of review.

**Prohibited** if active collaboration for the specific purpose of fundamental research, meaning research that is identified in the fundamental research proposal that is to be conducted between a covered individual and any academic institution or entity, or employee of such entity, on the current Prohibited Entity Lists or funding of or to.

**Mitigation required** if, within the past 5 years, indicators of affiliation by the covered individual or their co-authors on publications in S&E journals with an entity on any Prohibited Entity List at the time of review including: U.S. Bureau of Industry and Security (BIS) Entity List; Annex A of Executive Order (EO) 14032 or superseding EOs; Section 1260H of the National Defense Authorization Act (NDAA) for FY2021; Lists Published in Response to Section 1286 of the NDAA for FY2019 as amended; and 9 additional lists added in the March 9, 2026 update.

Co-authorship is considered.

Not Explicitly Indicated.

[Risk review of fundamental research proposals recommended for funding. Additional details can be found in the June 29, 2023 document.](#)

#### Department of Energy (DOE)

Office of Research, Technology and Economic Security (RTES) Framework

#### Considers Risk of:

- Funding the Project
- Possible loss of "IP", including pre-published or patented information



View DOE policies, guidelines & resources  
<https://tinyurl.com/3svz73wf>

**Prohibited:** Indicator(s) of active participation in a malign foreign talent recruitment program (MFTRP).

"Certain foreign funding sources (both monetary and in-kind)." Dates and types of activity are weighted in the risk assessment.

"Certain concerning behaviors associated with patenting (e.g., transferring to foreign entities after filing)." Dates and types of activity are weighted in the risk assessment.

"Ties to" foreign entities or foreign collaborators on specified lists, "for example", U.S. Bureau of Industry and Security Entity List; Annex A of Executive Order (EO) 14032 or superseding EOs; Section 1260H of the National Defense Authorization Act (NDAA) for FY2021; Lists Published in Response to Section 1286 of the NDAA for FY2019 as amended. Dates and types of activity are weighted in the risk assessment. DOE may request confirmation that the relationship has ceased. For past affiliations, associations or collaborations with entities on specified lists, DOE will consider the date the entity was added to the lists as part of the risk assessment.

Co-authorship is considered.

DOE is unique in that critical and emerging technology areas are the focus of many DOE programs. If the risk indicators are present on a proposed or existing project, consideration is given to whether the project falls within a critical and emerging technology area, whether the project will have physical or cyber access to critical infrastructure, and any project work with proximity to a military installation.

Phase 1: A review is conducted on Notices of Funding Opportunities, etc. to ensure language allows applicants to understand the RTES-related requirements and assess the technology risk level of the solicitation. Phase 2: Before selection, financial assistance projects undergo an RTES due diligence review, with consideration of the technology risk assessment during Phase 1 review. Phase 3: During the life of a project, additional RTES review may be triggered in situations where there are changes to the project, personnel, or ownership/control that could affect RTES.

#### National Science Foundation (NSF)

NSF Trust Process

#### Considers Risk of:

- Funding the Project
- Possible loss of "IP", including pre-published or patented information



View NSF policies, guidelines & resources  
<https://tinyurl.com/4vv6u48h>

**Prohibited:** Active participation in a malign foreign talent recruitment program (MFTRP).

Receiving research support from U.S. proscribed parties: 1. BIS Entity List, 2. the Annex of Executive Order (EO) 14032 or superseding EOs, 3. section 1260H of the FY19 NDAA or 4. section 1286 of the FY19 NDAA and nondisclosures of sources of research support.

N/A

Active appointments and positions with U.S. proscribed parties: 1. BIS Entity List, 2. the Annex of Executive Order (EO) 14032 or superseding EOs, 3. section 1260H of the FY19 NDAA or 4. section 1286 of the FY19 NDAA and Nondisclosures of appointments, activities, and sources of research support. Co-authorship is not considered.

Key/critical technologies identified in the CHIPS and Science Act, beginning with Quantum Information. Potential foreseeable national security applications of the research.

[Risk review of fundamental research proposals recommended for funding.](#)

#### National Institutes of Health (NIH)

NIH Decision Matrix

#### Risk Concerns Specific to:

- Lack of Disclosure



View NIH policies, guidelines & resources  
<https://tinyurl.com/yadt23kv>

**Prohibited:** Indicator(s) of active participation in a malign foreign talent recruitment program (MFTRP).

**Mitigation measures recommended** if indicators of past MFTRP participation within the last 5 years.

**Mitigation required** if indicators of undisclosed or incompletely disclosed active (ongoing) funding from an FCOC or connected entity.

**Mitigation recommended** if a non-FCOC or within the last five years

**Mitigation suggested** if within the last 5 years and not a FCOC.

N/A

**Mitigation measures required** if indicators of an undisclosed or incompletely disclosed active (ongoing) affiliation with an institution or entity located in or connected with a FCOC.

**Mitigation measures recommended** if within the last five years or a non-FCOC.

**Mitigation suggested** if within the last 5 years and not a FCOC.

N/A

[Review of proposals and ongoing awards.](#)

\*DoD defines affiliation as "Academic (not including undergraduate or graduate students), professional, or institutional appointments or positions with a foreign government or a foreign government-connected entity, whether fulltime, part-time, or voluntary (including adjunct, visiting, post-doctoral appointment, or honorary)."