



DEFENSE ADVANCED RESEARCH PROJECTS AGENCY
675 NORTH RANDOLPH STREET
ARLINGTON, VA 22203-2114

MEMORANDUM FOR DARPA STAFF AND CONTRACTORS

September 17, 2021

SUBJECT: DARPA Countering Foreign Influence Program (CFIP)

The DARPA CFIP is an adaptive risk management security program designed to help protect the critical technology and performer intellectual property associated with DARPA's research projects by identifying the possible vectors of undue foreign influence.

In order to identify and mitigate undue foreign influence, as required by Under Secretary of Defense for Research and Engineering (USD(R&E)), the Mission Services Office/Security and Intelligence Directorate (MSO/SID) CFIP team will create risk assessments of all proposed Senior/Key Personnel selected for negotiation of a fundamental research grant or cooperative agreement award. CFIP risk assessment ratings will be applied based on information found in the Standard Form (SF) 424, "Senior/Key Person Profile (Expanded)," and any of its accompanying or referenced documents, in concert with Executive Orders, federal policy, and publicly available undue foreign influence entity lists.

The undue foreign influence risk assessment process looks at all reported information available and cited in the SF 424 and places the most weight on the Senior/Key Person's activities over the last 4 years. CFIP risk ratings range from Low to Very High depending on the amount, type, and timing of foreign associations or affiliations that could constitute a foreign-influenced Conflict of Interest or Conflict of Commitment. Nationality or citizenship is not collected within this process and is not a factor in the risk assessment.

The CFIP risk assessment process will be conducted separately from the DARPA scientific review process and adjudicated prior to final award. The CFIP risk assessment will result in one of the following risk ratings and associated risk mitigation or acceptance guidance:

1. Proposals rated **Low or Moderate** risk do not require a risk mitigation plan or documented risk acceptance decision.
2. Proposals rated **High** risk may require a risk mitigation plan and will require a documented risk acceptance decision.
3. Proposals rated **Very High** risk will require a risk mitigation plan and a documented risk acceptance decision.

For proposals rated as High or Very High risk, the Contracting Officer will coordinate with the Program Manager (PM), Scientific Review Official (SRO), and the Office Director (in cases in which the OD was not the SRO) as part of the post-selection activities, and in-turn provide an opportunity for the proposer to address the risk (e.g., risk mitigation plan, alternative

Senior/Key Personnel, etc.) during negotiations. If the proposer is unwilling or unable to mitigate the risk to Low or Moderate, and the PM, SRO, and OD intend to proceed with the award notwithstanding, the DARPA Deputy Director must agree to accept the risk and proceed with the award.

External agents are encouraged to leverage the DARPA risk assessment process but may use their own DoD Component policies or procedures on countering undue foreign influence (if coordinated with DARPA). If the DARPA CFIP risk assessment is High or Very High, it will be provided to the technical office for inclusion in the Military Interdepartmental Purchase Request/Procurement Request package.

The Fiscal Year (FY) 2021 National Defense Authorization Act (NDAA) has identified more actions for the DoD to take regarding countering foreign influence in DoD-funded research programs. As those actions are implemented through DoD policy, DARPA's implementation policy may be updated.

This policy will be integrated either into a stand-alone guide or incorporated into an existing DARPA instruction. Questions regarding the DARPA CFIP can be directed to Kevin Flaherty, MSO/SID, at kevin.flaherty@arpa.mil.

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Director