

Policy on Compliance with the Louisiana Higher Education Foreign Security Act

Issued: 11/20/25

Revised:

Reviewed:

Relevant Units: Academic Affairs, Student Affairs, Research Services, Human Resources Management

I. PURPOSE: This policy will establish compliance with applicable state law that requires the reporting of foreign gifts, the screening of research and research support employees prior to an offer of employment, and the reporting of international travel to foreign adversary countries.

II. DEFINITIONS:

1. **Foreign Adversary:** Any foreign government or foreign non-government person determined by the United States secretary of commerce 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 18 §7.4 Determination of Foreign Adversaries, as amended or renumbered.
2. **LAHEFSA Committee:** The committee responsible for tracking and verifying all information regarding screening foreign researchers and research support employees, and approving & screening any employment-related international travel to and activities related to foreign adversary countries.

The LAHEFSA Committee composition shall include the following:

- a. Director of International Services
- b. Director of Disability Services/Title IX Coordinator
- c. Vice Chancellor for Academic Affairs
- d. Dean of Graduate Studies
- e. *Representative from SOM Dean's Office*
- f. Chair of International Travel Committee
- g. University Counsel
- h. Compliance and Privacy Officer

i. *Representative from Human Resources*

j. *Faculty Member Representative*

k. Vice President and Chief Financial Officer of LSUHSC Foundation

Voting Quorum – A committee member who is unable to attend a meeting may give another member their proxy, so long as such is in writing. Such proxy shall indicate the name of the individual authorized to vote and any special instructions thereof. Proxies shall only be valid for the meeting in which they were issued.

Unitalicized positions are permanent appointments. Members in non-permanent positions serve 2-year terms with no limits on consecutive reappointment.

3. Affiliate Organization: Any entity under the control of or established for the benefit of LSUHSC- NO.

a. This does not include any LSUHSC affiliated hospitals or clinical training sites.

b. This does include the LSU Health Foundation.

III. FOREIGN GIFT REPORTING:

1. All gifts from a foreign adversary country to the institution or affiliate organizations of the institution with a value of fifty thousand dollars or more must be reported to the Vice Chancellor of Administration & Finance's Office. This includes:

a. Expenses reimbursed by a foreign adversary institution or affiliate organization of the institution including: transportation, lodging, food, and any payments or honoraria received during or related to international travel and activities.

If a foreign adversary country provides more than one gift to the institution or an affiliate organization of the institution in a single calendar year with a total value of fifty thousand dollars or more, reports of all gifts received from that foreign adversary country will be collected by the Office of Legal Counsel and provided to the Baton Rouge System office.

IV. RESEARCH & RESEARCH-RELATED POSITION PRE-OFFER SCREENING GUIDELINES:

1. All research and research-related support positions, including graduate assistants and visiting researchers, must be screened prior to being offered employment.

a. For candidates with preexisting employment within the LSU System and no break in service, LSU-HSC will accept LAHEFSA clearances obtained at other LSU System campuses or grandfather in employees that started before July 1, 2023, in lieu of screening conducted by LSU-HSC.

2. All applicants selected to receive an offer for employment must complete the “Research and Research Support Pre-Offer Screening Form”.
3. Preferred applicants must be screened for the following:
 - a. United States Citizenship or permanent residence
 - b. Any affiliation with an institution or program with a foreign adversary
 - c. Any prior employment or training of at least one year with a foreign adversary
4. Applicants must also provide the following documents:
 - a. Current Passport, U.S. Birth Certificate or Certificate of Naturalization
 - b. Most recent Online Nonimmigrant Visa Application, DS-160, if applicable
 - i. If the most recent DS-160 is not available, a replication and notarized affidavit may be submitted in the alternative.
 - c. A complete resume/curriculum vitae that contains the following:
 - i. Every institution of higher education attended
 - ii. All previous employment since age 18
 1. Any applicant selected to receive an offer for employment who has continuously been enrolled and/or employed in the United States for at least 20 years can limit their previous employment history to the past 20 years.
 - iii. A list of all published material to which the applicant significantly contributed, even if not listed as the author
 - iv. A list of the applicant's current and pending research funding, including the amount and source, a brief research description, and role on the project
 - v. A list of all non-university professional activities including any affiliation with an institution or program outside of the United States (examples include but are not limited to being an expert witness, general consulting, publishing agreements, self-employment or business operations, board positions, gratis faculty appointments)
5. The LAHEFSA committee must take reasonable steps to verify all attendance, employment, publications, and contributions prior to an offer of employment.

- a. Reasonable steps may include but are not limited to searching public databases, searching public conflict of interest records, contacting previous employers, contacting institutions of higher education, searching public listings of persons under sanctions or restrictions, and/or requesting further investigation such as second background checks.
- 6. If an offer is made on or after July 1, 2023 to any applicant that has not completed the screening requirement and received clearance from the LAHEFSA Committee, the Letter of Offer is null and void.
- 7. In the event of an audit of the pre-employment screening process or records, information from the RedCap survey will be provided, as requested, by the LAHEFSA Committee Co-Chairs.

V. EMPLOYMENT-RELATED FOREIGN TRAVEL & ACTIVITIES

- 1. Any faculty member, researcher, or research department staff must be preapproved and screened for any employment-related travel to, and activities related to, foreign adversary countries.
- 2. International travelers must submit the following information/documents to the International Travel Committee prior to departure to a foreign country.
 - a. Place(s) to be visited and route if other than direct
 - b. Purpose of travel
 - c. Dates of travel
 - d. Source of funds for travel and estimated costs
 - e. Copies of abstracts, invitations, brochures, etc.
 - f. Prior Approval Request for Travel forms
- 3. International travelers must submit the following information/documents to the International Travel Committee within 90 days after returning from travel to a foreign adversary country:
 - a. Any gifts of funds or promises to pay offered by the foreign adversary country or any entity representing the interests of a foreign adversary.
 - b. Expenses reimbursed by the institution or affiliate organization of the institution including transportation, lodging, food, and any payments or honoraria received during the travel and activities.

4. The Director of International Services (LAHEFSA Committee Co-chair) will review international travel requests following approval of the International Travel Committee to determine if review by the LAHEFSA Committee is required.
 - a. If LAHEFSA committee review is not needed, the request will be forwarded to the Vice Chancellor of Academic Affairs (VCAA) for review.
 - b. If travel is to an adversary location, Director of International Services (LAHEFSA Committee Co-chair) will refer the request to the full LAHEFSA committee for review.
 - i. If approved by the full LAHEFSA committee, the request will be forwarded to the Vice Chancellor for Academic Affairs (VCAA) for further review.
 - ii. If denied by the LAHEFSA committee, the Director of International Services (LAHEFSA Committee Co-chair) shall return the request to the Chair of the International Travel Committee so the traveler, business manager and department head can be notified.
5. The Director of International Services (LAHEFSA Committee Co-chair) shall provide the required report of travel to adversary nations to the Office of Legal Counsel every 6 months in tandem with gift reporting. The report will be provided to the Baton Rouge System Office.
6. In the event of an audit of the international travel monitoring and screening process or records, information from the Director of International Services (LAHEFSA Committee Co-chair) will be provided to the auditors in consultation with the International Travel Committee Chair.

VI. ADDENDUM:

1. All gifts, honoraria, and non-LSUHSC-NO international travel funds are subject to PM-11 and Board of Ethics reporting and review requirements.

VII. REFERENCES:

[ACT 106: Louisiana Higher Education Foreign Security Act](#)

[Research and Research Support Screening Form 2025 2026](#)

[15 CFR 18 §7.4 Determination of Foreign Adversaries](#)