

AD HOC FACULTY COMMITTEE ON GUIDELINES FOR OUTSIDE ENGAGEMENTS

FINAL REPORT DECEMBER 15, 2020

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1 EXECUTIVE SUMMARY

Like other institutions of research and higher education, MIT faces an ever-changing landscape of philanthropy and engagements. In recent decades, costs have steadily increased, while support from U.S. government agencies has decreased. As a result, we are relying more heavily than before on a wide range of funding sources, including foreign governments, national and multinational corporations, private foundations, and individuals. This situation has prompted concerns about the nature and extent of MIT's dependence on outside sources of funding, whether through our acceptance of gifts and grants, or our participation in research associations and collaborations. Are we allowing outside sources to have undue influence on how we conduct our research? Are we inadvertently helping bad actors “launder” their reputations through their associations with MIT? Are we intentionally or unintentionally promoting agendas that are at odds with MIT's research and educational mission?

In response to these concerns, the Ad Hoc Faculty Committee on Guidelines for Outside Engagements (“the Committee”) was convened in October 2019 with the charge “to define a set of values and principles, consistent with MIT's mission, to guide the assessment of outside engagements” including “grants, gifts, and any other associations and collaborations involving MIT with governments, corporations, foundations, or private individuals, domestic or foreign.” Our goal was not only to make sure we maintain the excellence MIT is widely known for, but also to ensure we can raise enough funds to support this vision and our broader mission.

MIT has always set a standard for leadership, which compels us to deal with the issues that confront us with the gravity they demand. By more deliberately and explicitly aligning our actions with our core values and principles, we hope to make a clearer statement of who we are as a community, and where our boundaries are, while setting an example for the rest of the nation. To that end, the Committee has articulated a list of core values and principles, and developed a set of guidelines (in the form of tools) that decision-makers at MIT can use in evaluating potential gifts and outside engagements. A separate but related committee, the Ad Hoc Faculty Committee on Gift Processes (“Processes Committee”), is charged with specifying in more detail how these guidelines and tools will be put into practice in relation to gifts.

The Committee's charge required standing a parallel Student Committee on Outside Engagements (“Student Committee”) to deliberate the same issues and to produce a report that is included herein as [Appendix 8](#).

To orient our deliberation, we began with the MIT mission statement. We then solicited input from community members across MIT. We requested white papers from all departments, labs, and centers, and we held campus conversations and office hours to provide faculty, postdoctoral fellows and associates, non-faculty instructors, staff, students, and alumni the opportunity to share their views. We reviewed relevant value statements and guidelines from peer institutions. And we considered a range of specific, detailed examples of potential gifts and outside engagements that MIT decision-makers have or could have considered. In the end, a consensus emerged around nine core values and principles. MIT is committed to excellence. Any excellence worth achieving, and any reputation worth maintaining, will be so in part because it is an expression of these core values and principles. We did not rank these values in order of importance, and the list that follows is not intended to reflect any such ranking:

- Academic integrity

- Academic freedom
- Education and mentorship
- Service
- Diversity, equity, and inclusion
- Transparency
- Professional integrity
- Respect
- Courage to act on our convictions

To bring these abstract ideals closer to practice, we then developed a set of guidelines to be used by decision-makers at MIT who are considering whether or not to accept specific gifts or grants, or to participate in certain research or educational associations or collaborations. The tools that form the basis of these guidelines are designed to ensure careful consideration of how acceptance of a given gift or engagement would impact our ability to uphold our core values and principles. Some of the issues we ask decision-makers to consider are: the impact of the gift or engagement on national security; its consistency with the law; its implications for the protection of political, civil, and human rights; whether transparency about the gift or engagement would damage our reputation; and whether participation in it would force us to stray from our educational mission or invite undue influence on our academic freedom.

Because deciding complex cases will sometimes require more extensive deliberation, we recommend the establishment of a “Standing Committee,” whose membership should reflect a diversity of outlooks and experiences. The role of the Standing Committee will be to consider and resolve difficult cases. In addition, it will document its decisions in such a way that, over time, it will build a body of case law to which decision-makers can refer in dealing with new cases. Ideally, as this body of case law grows, it will become easier for the Standing Committee to make decisions on new cases. The goal is that this combination of tools, Standing Committee, and case law will expedite, rather than delay, the process of accepting or rejecting gifts and outside engagements as it promotes transparency and greater consensus about each specific decision.

During one of the campus conversations, a staff member articulated the difficult task ahead: “The values that you have are the ones that you are willing to sacrifice for. If you are not sacrificing anything, then you probably do not have your values right, or your values are meaningless.” The more we internalize our values, the more they become second nature, the less any of those sacrifices will feel like sacrifices. We hope that this guidance will become an integral part of MIT’s DNA—a feature of our shared institutional culture and of our characters as individuals. And we hope that this culture will have an impact on the wider world, as our community members move on to pursue new professional and personal opportunities outside of MIT. We welcome others to join us in our fundamental education and research mission, with full transparency around the values and principles to which we are committed.

2 INTRODUCTION

2.1 CHARGE

The Ad Hoc Faculty Committee on Guidelines for Outside Engagements (“the Committee”), was convened by the Chair of the Faculty, Professor Rick Danheiser, in Fall 2019 in the wake of revelations concerning the involvement of Jeffrey Epstein with the Media Lab and other individuals at MIT. Before these revelations, former Chair of the Faculty, Professor Susan Silbey, had convened a committee to deliberate on international engagements. In creating the new committee, Professor Danheiser recruited several members of Professor Silbey’s committee, which was dissolved. To this membership, Professor Danheiser added additional faculty with experience in fundraising and in the supervision of labs and centers with significant research funding.

In October 2019, Provost Marty Schmidt convened an Ad Hoc Faculty Committee on Gift Processes (“Processes Committee”), chaired by Professor Peter Fisher. Given the need for tight links between guidelines and processes, and to facilitate communication and ensure coordination, in agreement with Provost Schmidt, three members of the Committee were chosen to serve as voting members of the Processes Committee.

The charge to the Committee was to define a set of values and principles, consistent with MIT's mission, to guide the assessment of outside engagements. Outside engagements include grants, gifts, and any other associations and collaborations involving MIT with governments, corporations, foundations, or private individuals, domestic or foreign. The Committee was to produce a set of guidelines to be employed by MIT decision-makers, in ways defined by the Processes Committee, for the evaluation of potential outside engagements.

A detailed charge is included in [Appendix 1](#) and can be found [online](#).

2.2 MEMBERSHIP AND COMMITTEE DELIBERATIONS

The Committee was chaired by [Tavneet Suri](#), Associate Professor at the Sloan School of Management, and staffed by [Deliana Ernst](#), Assistant Director of the MIT Skoltech Program.

The full Committee included 17 other members, drawn from across all schools and with a range of fundraising experiences (see [Appendix 1](#) for more about the Committee), selected by the Chair of the Faculty. Some members (indicated with an asterisk in the list that follows) were part of an International Subcommittee, along with the chair. That subcommittee was created in the charge set out by Professor Danheiser. Other members (indicated with two asterisks), along with the chair, were also part of the Processes Committee.

- [Daron Acemoglu](#), Institute Professor, Department of Economics*
- [W. Craig Carter](#), POSCO Professor of Materials Science and Engineering
- [Arup K. Chakraborty](#), Robert K. Haslam Professor of Chemical Engineering, Professor of Physics and Chemistry, and Core Member (Founding Director), Institute for Medical Engineering and Science
- [Fotini Christia](#), Professor of Political Science*

- [Robert Desimone](#), Doris and Don Berkey Professor, Brain and Cognitive Sciences, and Director, McGovern Institute for Brain Research
- [Amy Glasmeier](#), Professor of Economic Geography and Regional Planning, Department of Urban Studies and Planning*
- [Paula T. Hammond](#), David H. Koch Chair Professor of Engineering and Department Head of Chemical Engineering
- [Daniel E. Hastings](#), Cecil and Ida Green Education Professor and Department Head of Aeronautics and Astronautics*,**
- [Diana Henderson](#), Arthur J. Conner (1888) Professor, Associate Head of Literature
- [Chappell Lawson](#), Associate Professor of Political Science and Director, MIT International Science and Technology Initiatives (MISTI) Program*, **
- [Jacqueline Lees](#), Virginia and D.K. Ludwig Professor for Cancer Research, Associate Head of Biology, and Associate Director of David H. Koch Institute for Integrative Cancer Research
- [Tamar Schapiro](#), Associate Professor, Department of Linguistics and Philosophy
- [Susan S. Silbey](#), Leon and Anne Goldberg Professor of Humanities, Professor of Sociology and Anthropology, and Professor of Behavioral and Policy Sciences, Sloan School of Management
- [Yogesh Surendranath](#), Paul M. Cook Career Development Associate Professor of Chemistry
- [Bruce Tidor](#), Professor of Biological Engineering and Computer Science*
- [Robert D. van der Hilst](#), Schlumberger Professor of Geosciences and Department Head of Earth, Atmospheric, and Planetary Sciences
- [Bilge Yildiz](#), Professor of Nuclear Science and Engineering, Professor of Materials Science and Engineering

The charge to the Committee included the creation of a parallel Student Committee on Outside Engagements (“Student Committee”) to deliberate these same issues and to provide input to the Committee. The Student Committee report is included as an [Appendix](#) to this report, as per the charge.

The original Committee on International Engagements met informally twice in September 2019 to discuss the potential new committee with a broader mandate. The newly constituted Committee then met 19 times in total, each meeting lasting 2 hours. Four of these meetings took place in the Fall of 2019, one during the Independent Activities Period (IAP), and the rest in the Spring of 2020. In addition, the International Subcommittee met six times, each time for 90 minutes (these meetings were held in the Fall of 2019 and during IAP). Three Committee members (Tavneet Suri, Daniel E. Hastings, and Chappell Lawson) were also part of the Processes Committee, which met weekly for an hour each time. Furthermore, two Committee members (Diana Henderson and W. Craig Carter) and the chair met with the parallel Student Committee several times to share progress.

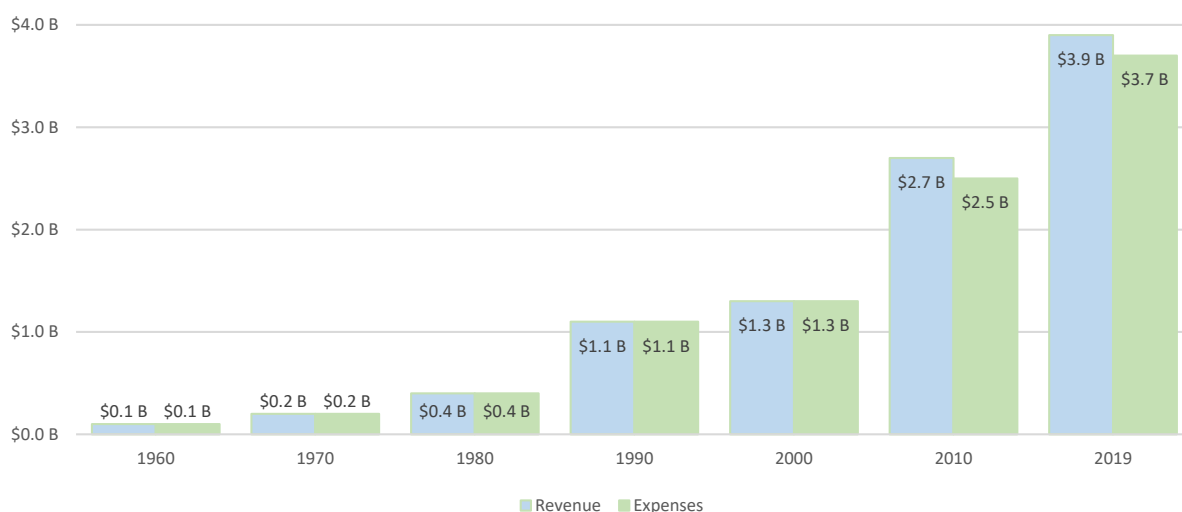
Altogether, Committee members have decades of experience as faculty, fundraisers, and administrators (as highlighted in results of a survey of committee members, reported on in [Appendix 1](#)). The Committee had robust conversations, with extensive deliberation whenever there were disagreements. We strove for a rough consensus, which was achieved on most topics. Dissenting opinions on specific points are mentioned as they arise throughout this report. This approach illustrates the immense value of collective deliberation. Committee members were open minded, listened to each other respectfully, learned from

each other, and sometimes changed opinions based on deliberations. This report enjoys the unanimous endorsement of the Committee.

2.3 A VIEW OF MIT'S FINANCES

In comparison to most academic institutions, MIT has a large budget and endowment (**Figure 1** shows MIT's revenues and expenses between 1960 and 2019). Here, we offer some facts about MIT's finances that are relevant for context and to better appreciate the roles of fundraising and outside engagements at MIT and the potential impact of any new guidelines. Please note that throughout this report, due to rounding, the sums of numbers presented may not match the totals provided, and percentages (where provided) may not add up to exactly 100%.

Figure 1: MIT Revenues and Expenses, 1960–2019

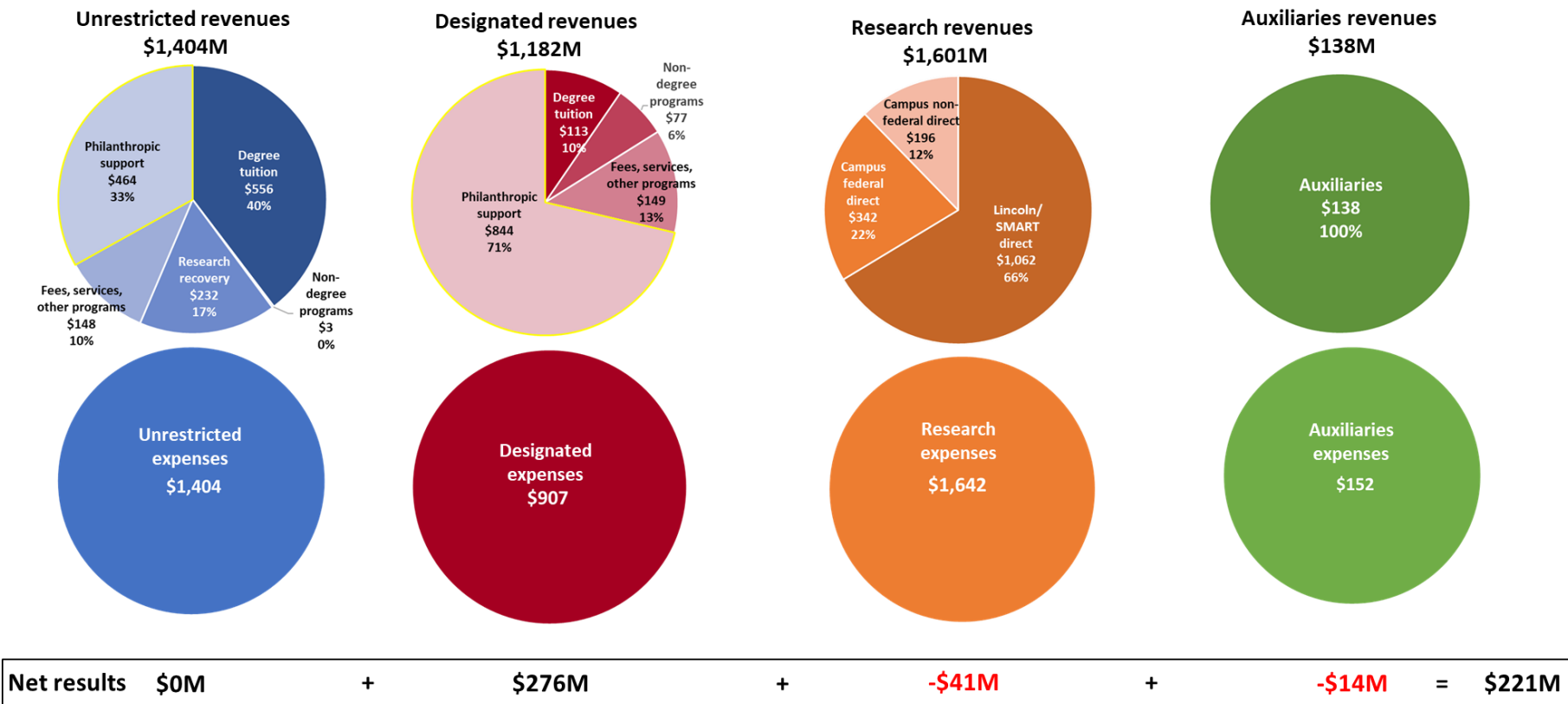


MIT's expenses can be thought of as comprising elements that advance two main purposes aligned with our mission: education and research. Graduate students occupy an area of overlap because those who are not supported by teaching assistantships are often supported through research grants, training grants, and other research funds.

Except for tuition, nearly all the education and research funds at MIT come from current or past outside engagements, including grants and gifts. Philanthropic resources are interwoven throughout the operations of the Institute. Gifts and pledge payments for current use, and income and gain from investing the endowment and working capital often derived from philanthropic proceeds, fund the costs of specific faculty, programs, and functions, and form a significant portion of the unrestricted revenues allocated to academic and administrative units through the General Institute Budget (GIB). Faculty, of course, play a tremendously important role in raising these funds as well as those for research.

Campus research revenue, including funding for direct research activity and the recovery of facilities and administrative costs enabling our research enterprise, accounted for approximately one-quarter of total campus revenue in Fiscal Year 2019; and 40% of campus research volume in 2019 was supported by non-federal sponsors, up from 29% a decade ago. **Figure 2** provides an overview of 2019 revenues and expenses by type.

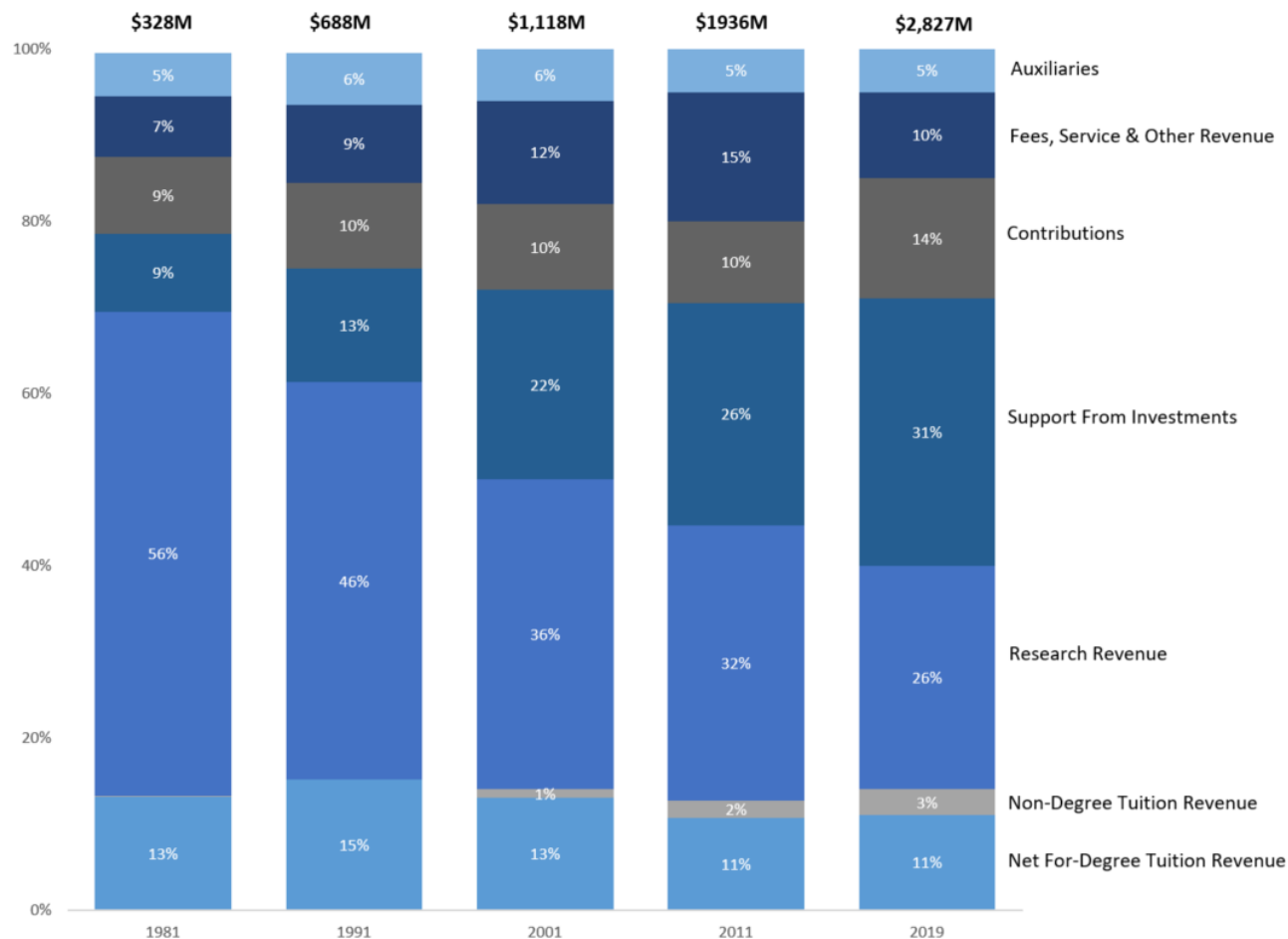
Figure 2: Revenues and Expenses by Type, 2019



*Various revenues & expenses reclassified from presentations in other MIT internal financial publications to include restricted revenues (and the expenses they fund) within “designated” and treat financial aid as an expense (as opposed to an offset to tuition revenue). MIT Report of the Treasurer (GAAP) net results of \$221M preserved.
Philanthropic support includes expendable gifts and pledge payments, endowment income, income from working capital investments (often derived from philanthropic proceeds) and other investment income.

MIT's endowment derives principally from philanthropic funds. Through the annual distribution of a portion of its investment returns, the endowment has supported significant growth in MIT's operations. As shown in **Figure 3**, between 1981 and 2019, the fraction of our growing campus budget coming from investment support (principally distributed endowment returns) has grown, while the fraction from research revenues has shrunk. Note that auxiliaries include dining, housing, the Tech Review, MIT Press, and Endicott House.

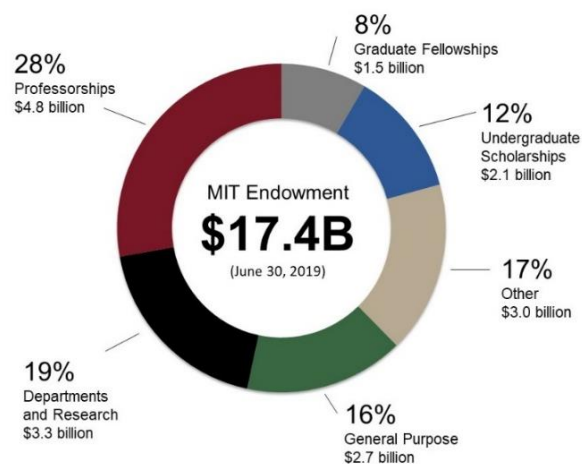
Figure 3: Sources of MIT Revenue, 1981–2019



Even while providing increasing support for operations, the endowment has grown significantly in recent years, due in part to its retaining a portion of investment returns to maintain purchasing power to provide long-term support for MIT's needs. The endowment also has increased due to additional gifts provided by donors each year. Although our endowment is large (\$17.4B), only 16% (\$2.7B) is available for general

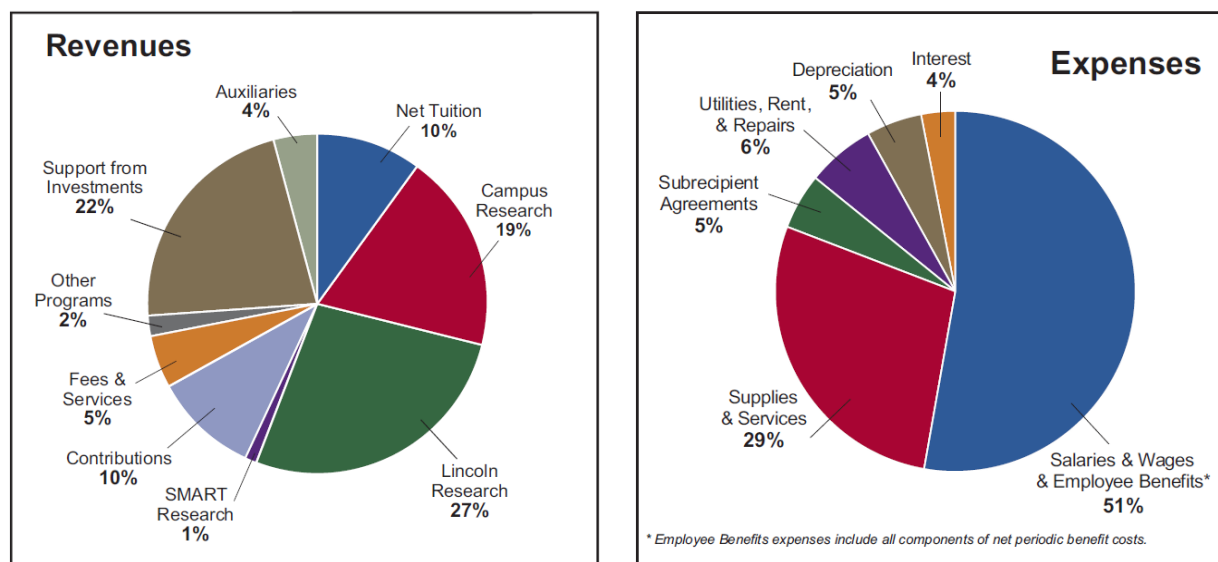
purposes. The rest must be spent on specific purposes (see **Figure 4**). The investment returns from this portion are distributed through the GIB for a wide range of purposes, including financial aid and other graduate student support; faculty and academic staff costs; curriculum development; campus operations; construction, renovation, and upkeep; administrative and central functions; and external rent and taxes. The rest of the endowment (\$14.7B) is restricted to supporting specific purposes—for example, research; scholarships; fellowships; professorships; and school, departmental, and faculty discretionary funds. When a donor gives funds to the endowment for a specific purpose, MIT has a legal obligation to distribute these funds according to the donor’s intent.

Figure 4: MIT Endowment by Purpose, 2019



The annual revenue and endowment income or payout are used to support the expenses of MIT each year, as broken out for 2019 in **Figure 5**.

Figure 5: MIT Revenues and Expenses by Purpose, 2019

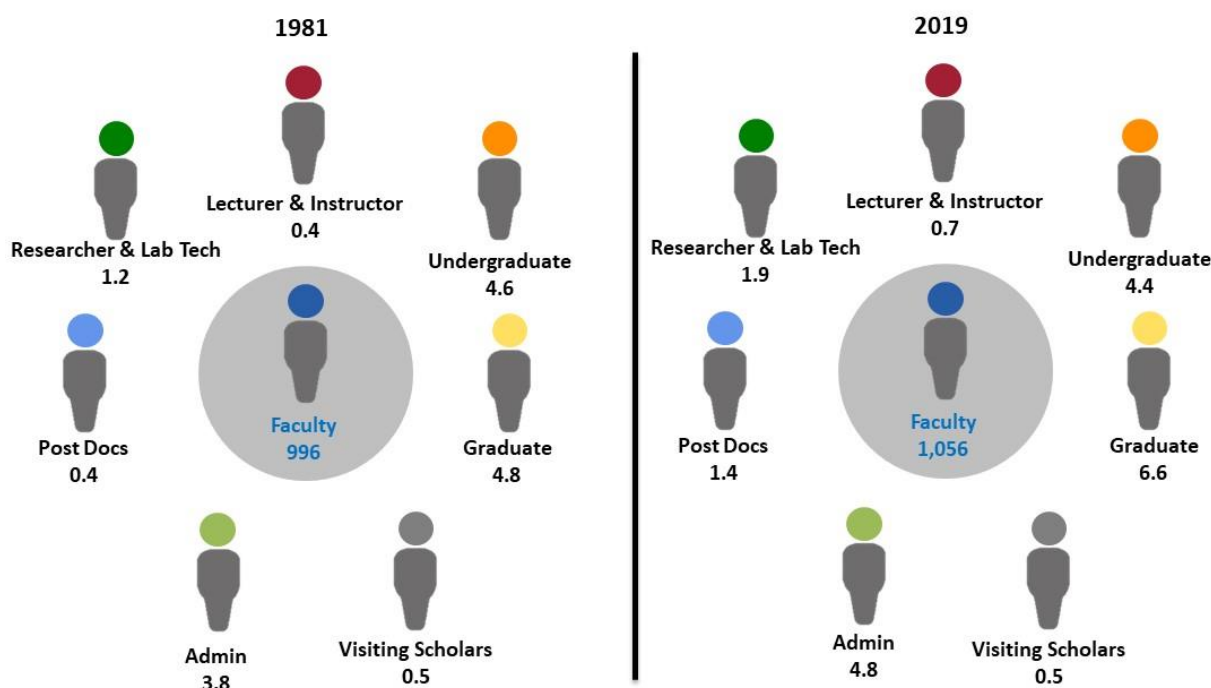


While the number of people employed at MIT has grown substantially over the years,¹ the number of faculty has not, increasing only about 6%, as shown in **Figure 6**. (Note that this does not include future committed slots, such as for the College of Computing). There is some concern that much of MIT’s increasing expenses must be due to increases in administrative staff. Although the size of the

¹ Focusing on the past decade, the average annual growth rate for administrative staff full-time equivalent personnel is 4.0%. Broken down into academic and non-academic components, the growth rates are 5.3% and 2.1%, respectively. A further breakdown of the non-academic portion shows that the growth rate for revenue-generating units (MIT Investment Management Company (MITIMCo), Alumni Affairs, and Resource Development) is 4.6%, while the growth rate for non-revenue-generating units is 1.4%.

administrative staff has grown in the past 20 years, **Figure 6**—which shows the total number of faculty, other categories of MIT employees, and students per faculty member (whose number has not grown much over the same period)—highlights that most of the increases come from the number of postdoctoral fellows, research technicians, and graduate students; that is, people largely engaged in research (whose stipends and salaries have grown as well). Thus, if fundraising were curtailed at MIT, the impact would disproportionately affect the number of postdoctoral fellows and associates, technicians, and graduate students.

Figure 6: People at MIT, 1981–2019



Note: Excludes the Credit Union, edX, the Consortium on Financing Higher Education, the Forum for the Future of Higher Education, retired faculty, affiliates, and visiting students. In 2019, there were 1,006 visiting students, 1,209 affiliates, and 277 retired faculty on campus. Figures for 1981 are unavailable. The figure shows the total number of faculty as an absolute number in the center of the graphic for the year shown, surrounded by the numbers of other staff and students by category, indicating the number of staff/students in each category per faculty member.

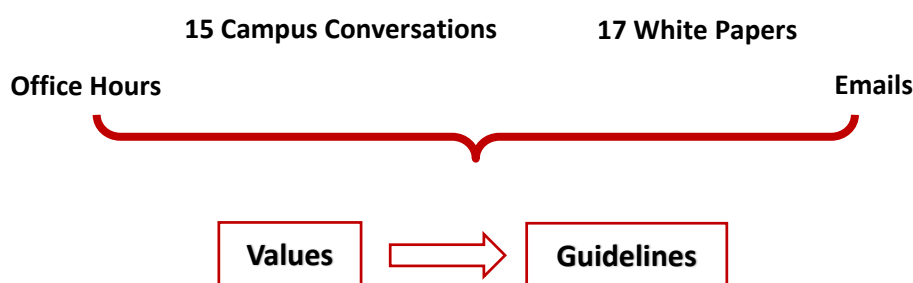
Gifts and outside engagements are important to MIT for a variety of reasons. Certainly, gifts and funded engagements provide crucial financial resources for research, education, student support, campus construction, and much more. Beyond the fiscal considerations, however, outside engagements bring MIT students, staff, and faculty in closer contact with compelling research problems, outstanding colleagues, and unique opportunities to have positive influence in the world. Many of these engagements are faculty initiated; even engagements strongly connected to the MIT administration are still largely designed and run by faculty. Because of the importance of such programs to MIT's mission, the Committee was guided throughout its discussions by the principle that it is important to enable these relationships, without compromising the values and guidelines below.

3 COMMUNITY ENGAGEMENT

As a committee, we insisted on our accountability to the community; collecting feedback directly from faculty, staff, students, and alumni from across the Institute was core to our charge. The Committee took this seriously, designing a feedback process that was inclusive both within the Committee and within the community. The feedback process was an exercise in developing a common view of the issues and in building trust across the community for the Committee’s deliberative process.

We collected an initial round of feedback in the Fall of 2019 via campus conversations, white papers, office hours, and emails, which provided input into our values and principles concerning outside engagements and the guidelines that emanated from these values (as shown in **Figure 7**).

Figure 7: Community Engagement



In addition to formal meetings, the Committee chair and individual members had dozens of informal conversations with colleagues and members of MIT’s senior-level staff to solicit their input. Reporting back to the community was an equally important part of our accountability. In May 2020, we held a Community Forum to solicit feedback on our draft values and guidelines, which we then incorporated. We released a draft report to the MIT community in early September and have incorporated feedback on that draft.

3.1 CAMPUS CONVERSATIONS

Over the course of the 2019 fall semester, the Committee organized 15 campus conversations. Those conversations included five for faculty (these were organized by school but open to any faculty to attend), four for staff (including one for research staff and one for all Resource Development and Alumni Association staff), two for students, three for alumni, and one open meeting at the end of Fall 2019 for those who could not attend other conversations.

In total, approximately 80 faculty, 280 staff, 25 alumni, and 40 students attended. To aggregate the feedback, the conversations were recorded and transcribed. The Committee reviewed all the transcripts in a consistent and systematic fashion, noting the issues raised by constituency during the conversations and ultimately sorting them into three categories: (i) values, (ii) guidelines, and (iii) specific structures around these guidelines. These were then integrated into our deliberations around the final values, guidelines, and recommendations made in this report. [Appendix 2](#) summarizes the feedback offered in these campus conversations.

3.2 OFFICE HOURS

In addition to the campus conversations, some members of the Committee held announced office hours for members of the MIT community who wanted to chat one-on-one rather than in public. A total of 12 hours of office hours were held between late November and mid-December 2019 by W. Craig Carter, Diana Henderson, Robert Desimone, Susan Silbey, and Tavneet Suri.

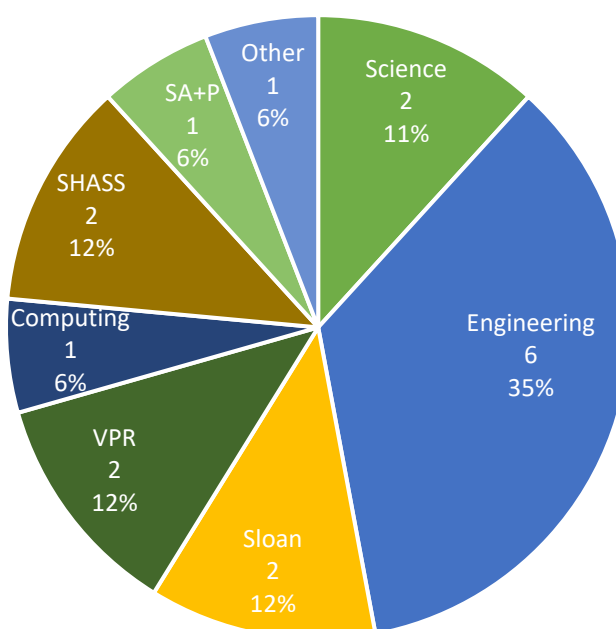
3.3 WHITE PAPERS

The Committee asked all the heads of departments, labs, and centers (DLCs) to convene their communities (faculty, staff, and students) to create a white paper to be submitted to the Committee on values and principles for engagements. We provided DLC heads with some guidance about topics to include in the white papers (see [Appendix 3](#)), but we left them to convene their communities as they chose. DLCs consulted with their communities in different ways, ranging from emailing a survey to the entire DLC population to conversations among smaller sub-groups to generate a first draft that was then circulated for comments. We received a total of 17 white papers. One of the white papers submitted by the Sloan School was the result of a joint discussion by nine different DLCs at Sloan.

Approximately 30% of the DLCs submitted a white paper. **Figure 8** shows the distribution of white papers received across schools (the first number is the absolute number of white papers received, and the second is the percentage out of all white papers received). As with the campus conversations, we systematically reviewed the white papers, sorting the issues each DLC raised into three categories: (i) values, (ii) guidelines, and (iii) specific structures around these guidelines. This material was then integrated into our deliberations around the final values, guidelines, and recommendations made in this report. The white papers were of extremely high quality and reflected nuanced, careful reasoning about the issues, including potential tensions and tradeoffs.

[Appendix 3](#) summarizes the feedback from the white papers.

Figure 8: White Papers Submitted to Committee, by School



Key:

- SHASS – School of Humanities, Arts, and Social Sciences
- SA+P – School of Architecture + Planning
- VPR – Office of the Vice President for Research
- Sloan – Sloan School of Management

3.4 EMAILS AND CONVERSATIONS

In addition to the formally organized campus conversations, the Committee received a number of emails with recommendations and suggestions. Also, a number of the Committee members had conversations outside the formally organized venues with members of the administration, the corporation, students, and faculty in their departments. Input from these conversations was included in our deliberations.

3.5 READINGS

The Committee was cognizant that a number of previous committees had possibly previously worked on some subsets of the issues we were interested in or had relevant information as background context for our committee. We read several past MIT reports as part of our work. [Appendix 4](#) lists the reports we reviewed. We are grateful to all these earlier MIT committees for their service to our community. They continue to guide us by providing important historical context as a foundation. In addition to the MIT reports, we read broadly from the academic literature on the ethics of philanthropy, as well as essays about the pertinence of these issues to academia.

3.6 PEER SCHOOLS

Deliana Ernst, staff member to the Committee, collected all the publicly available policies from peer and other schools and summarized these for the Committee. A total of 12 peer schools had publicly available policies at the time. A summary of these policies is provided in [Appendix 5](#). However, note that none of the peer schools explicitly articulates a set of values grounding their decisions to accept particular gifts or engagements. None reported a process similar to what we followed to develop a statement of values, soliciting feedback from across the community, and integrating those values into decision-making guidelines.

3.7 FEEDBACK ON THE DRAFT REPORT

A draft report from the Committee was released to the MIT community in early September. Between early September and early December, the Committee chair, along with the chair of the Processes Committee, presented the report across campus to collect feedback. They collected feedback from Academic Council, the Deans Council, Science Council, the Faculty Policy Committee, Computing Council, SHASS Council, Engineering Council, the International Advisory Committee, the Sloan Gender Equity Committee and a group of MIT Corporation members.

In addition, the two committee chairs, in collaboration with the Chair of the Faculty and the Provost, held a Community Forum on October 6th to collect feedback from the broader MIT community. In addition, an email address was set up for feedback from the community. We received a number of emails with comments on the two reports. The two committee chairs also received a large number of emails to their personal email accounts – these were largely positive comments, thanking the committees for their work. We have integrated all that feedback, where appropriate and relevant, into this report.

4 MIT CORE VALUES AND PRINCIPLES

MIT aspires to advance the frontiers of knowledge and educate students in science, technology, and other areas of scholarship that serve the nation and the world. In this quest, we strive to be a leader in the global community by pursuing excellence in everything we do; and, in so doing, to respect, safeguard, and—where possible—improve, our reputation. Our reputation is our capital; it creates a positive return by attracting the best to our community, but it can also be depleted by our actions. Conversely, we can enhance our reputation by taking a principled and public stand that reflects fidelity to our core values. We should embrace activities that are true to our values, even when they are inconvenient or simply unconventional.

Over the decades, many of our actions at MIT have been guided and inspired implicitly by our values, and we have found the courage to lead from our conviction in these values and in our mission. Examples of such actions include the [1999 report, “A Study on the Status of Women Faculty in Science at MIT”](#) (and the Institute’s response to it); the [antitrust case with the U.S. Government concerning financial aid in the early 1990s](#); launching open courseware and, more recently, MITx; and, this past July, [suing the U.S. Government for its visa policies](#) for international students.

Values must also guide our gifts and outside engagements. We should not participate in reputational rehabilitation (directly or indirectly) by engaging with individuals or entities whose misdeeds are egregious, such that association with them would undermine our reputation or negatively affect our ability to promote our values.

While MIT is in the process of setting up a Values Committee², our committee began by articulating the values and principles most relevant to the Committee’s charge. The articulation of values cannot be a one-time event: Values demand reiteration and recommitment; and, as the Processes Committee and our committee recommend, they demand repeated and continual investment. Values also have a context, and the values articulated here are those that arose from broad campus input within the context of gifts and outside engagements. We could not create guidelines, which was our charge, without considering values; they are logically connected. Outside the scope of our charge, we look forward to hearing of the work of the Values Committee, which could provide additional relevant insights by examining a larger context.

To come to an articulation of values, the Committee internally conducted an exercise (based on design thinking) to understand what values we, as a group, believe are fundamental for the Institute. To the output from this exercise we added the feedback we collected on values from all the campus conversations, office hours, white papers, emails, readings, and meetings with members of the community.

The core values that emerged from the consolidation of the exercise and the community inputs are as follows (in no particular order).

² In February 2020, Chancellor Cynthia Barnhart and Provost Martin Schmidt (along with Ramona Allen, Rick Danheiser, Mark DiVincenzo, Leslie Kolodziejewski, Susan Silbey, Sheila Widnall, and Maria T. Zuber) announced a new, Institute-wide committee that will develop an MIT statement of shared values in response to the report of the National Academies of Science, Engineering, and Medicine on the status of women.

Academic integrity

We strive to pursue and advance knowledge according to norms and procedures that are designed to protect against bias, distortion, and misinformation. We recognize that these norms and procedures will be diverse, according to differences in subject matter, approach, and research methods; but all must be transparent and provide standards in light of which conclusions can be publicly challenged and justified.

Academic freedom

We strive to protect and promote academic freedom at all stages of inquiry—the framing of research priorities and questions, the execution of research, and the dissemination of findings—as well as free and open academic debate on campus. No source of financial or political support, whether it be an individual or an organization, should have undue influence at any stage of the research process or a stifling effect on MIT’s intellectual climate.

Education and mentorship

We strive to build a community in which we teach and learn from one another so that all of us can benefit from our shared knowledge and experience. We value both knowledge that is acquired through formal training and that which is gained from professional and lived experience. The responsibility to teach and learn from one another extends to faculty, students, and staff at all levels. In the same spirit, we support open access to the work generated at MIT, so that those outside of MIT can learn from it.

Service

We strive to work diligently, creatively, and effectively for the betterment of the nation and the world, as well as our MIT community. While it can be difficult to anticipate the full consequences of scientific and technological innovation, our aim is to advance knowledge that will have a beneficial impact on the United States and humanity as a whole.

Diversity, equity, and inclusion

We strive to build an inclusive, equitable community characterized by a diversity of backgrounds, experiences, and opinions. Diversity, equity, and inclusion are ongoing challenges that require education, commitment, and vigilance at all organizational levels: the Institute as a whole, schools, departments, labs, and centers, as well as individuals. Recognizing these challenges, we strive to overcome the systemic barriers to the advancement and inclusion of currently underrepresented groups, and aim to dismantle the specific mechanisms that perpetuate inequity and marginalization.

Transparency

We strive to establish transparent procedures at all levels of decision-making within the Institute. Transparency protects against conflicts of interest, abuse, and corruption by promoting accountability. It also provides a basis for learning from our mistakes and improving our decision-making over time. Different forms of disclosure will be appropriate in different contexts, but the presumption is that more transparent procedures are preferable, wherever possible.

Professional integrity

We strive to act with integrity in our institutional roles. Doing so involves avoiding wrongdoing and impropriety, as codified in laws and regulations, as well as upholding professional and institutional standards. Integrity also involves taking responsibility for our actions, including those we regard as mistakes or failures.

Respect

We strive to build a community based on mutual respect, fairness, and civility. This is especially important in contexts where we disagree with one another over substantive matters and in relations of unequal power, as between faculty and students, or supervisors and subordinates. The same respect, fairness, and civility should extend to those outside MIT with whom we engage.

Courage to act on our convictions

There may be circumstances under which it is costly to uphold these values. We strive to have the courage to uphold them even in the face of political, social, or financial pressure to do otherwise. We also strive to provide an example to other institutions that might benefit from our leadership.

The values outlined here have an aspirational aspect to them. They are values we wish to live by. However, we cannot simply ask MIT to operate by a set of values that each one of us cannot live by or commit to in our own actions and professional activities. Joining the MIT community conveys an obligation to understand these values, reflect upon them, and ensure that our actions on our campus and in our community work in concert with these values. We hope the next committee contemplating MIT's values will chart a way forward for us not only to articulate our values, but also to help develop processes by which we can enact those values. Such value statements remind us that we are a community of shared norms, and we cannot lose sight of that fact. Investing ourselves and our work in this community is as important as almost anything else we do. As we gathered feedback, a feeling was expressed by some on campus that we have lost a bit of the culture of “the commons” as MIT has grown in recent decades. We hope this notion of shared values as a collective commitment will encourage a reinvestment in building our community and reiterate the importance of our own community's common good and mission.

5 GUIDELINES: THE TOOLS

With these values in hand, and with the input from the community, the Committee reached a general consensus on what a set of guidelines should look like and what accompanying infrastructure would be needed to enact these guidelines (“the tools”) as a standard process of decision-making at MIT. Ultimately, we hope that the guidelines and associated tools become fully internalized among all members of the MIT community and acquire a “taken for granted” quality. We may be the first university to articulate both a set of values around our engagements and an accompanying set of guidelines that came from a “bottom-up” process, and we hope that we will not be the last to do so.

We should highlight the fact that MIT (as well as all other institutions of higher education) already exerts significant effort to understand its donors and collaborators better as it builds these relationships. Indeed, as part of that process, we will continue current practices, collecting information on each donor or collaborator, sometimes with help from outside companies that have relevant expertise (we list those

used by MIT in [Appendix 7](#))—always treating this information as highly confidential and safeguarding it accordingly. We do not recommend collecting any additional information. The guidelines we provide here simply add two elements to the process. First, they help direct some of the information gathering to what is important for our community’s values and principles. Second, they create a more representative governance process at MIT for the decision-making around these gifts and engagements. A few universities do have a publicly available gift giving guide or policy (see [Section 3.6](#)), and the Processes Committee recommends MIT develop one.

We emphasize that the Committee was not charged with auditing past gifts or engagements (though we did assess some past cases to stress-test the tools, as described in [Section 5.3](#)). The guidelines and tools presented here are designed to legislate for the future and are not meant to be applied retroactively. In this respect, we suggest a path forward: a path that we hope takes the realities of the global situation we face seriously; and one that we hope keeps MIT’s mission, its reputation, and its welfare front and center. These guidelines aim to be balanced, to help us retain our ability to attract and train world-class students and encourage our engagements to solve the most important problems in the world through the use of global data³ and exposure to different environments and contexts.

The guidelines highlight our commitment that our gifts and engagements not undermine the values of our community or our reputation. As this commitment includes promoting diversity—including diversity in thought, preferences, and reasonable opinions—we emphasize that these tools do not (and should not) be the basis for determinations based solely on liking or disliking someone’s political opinions, or finding someone’s opinions personally distasteful.

In addition to respecting diverse political views held by our faculty, staff, and students, we should recognize and respect that many individuals and corporations are engaged in lawful activities that may nevertheless be controversial. While engaging with some of these individuals and corporations—within the guidelines and values that our report clarifies—we also should see such engagements as opportunities to help shape the future of these corporations and industries. Putting on paper how our values guide our engagements will enable our partners to know, understand, and appreciate our commitment to our values, and it may help them choose to engage with us more deeply as a result.

The guidelines will provide focus and counsel to MIT faculty and staff in their fundraising efforts, while providing legitimacy for and trust in the fundraising processes for those not directly engaged in these activities. Indeed, the practical role of the tools themselves is to identify gifts or engagements that may require deliberation within the community before we enter into them.

While the tools are not designed to legislate the past, if current engagements are to be renewed, they should be subject to the new guidelines when they come up for renewal. In their current form, such engagements are open to appeals to the Standing Committee described in more detail later in this section and in [Section 6](#).

These tools are an expression of community self-regulation. An example of the power of community self-regulation was the creation of guidelines for addressing the potential hazards of recombinant DNA

³ We expect all uses of data and all data agreements to abide by all our values and any other MIT ethics requirements (such as Institutional Review Board processes).

experimentation developed at the Asilomar Conference in 1975. Those guidelines, immediately adopted by all practicing scientists, were soon thereafter incorporated in federal policy for NIH-funded research.

Several situations are beyond the purview of the Committee. For example, the guidelines are not designed as a mechanism for determining membership on the MIT Corporation or in the MIT community at large, or with whom members of the MIT administration can meet on or off campus, or who can visit MIT. In such cases, we encourage all members of the MIT community to use good judgment; to act in concert with our values; and, if needed, to seek the relevant expertise and advice in making these decisions (we discuss the role of expertise in more detail in [Section 6.2](#)). In addition, we do not see these guidelines as applying to Lincoln Labs, and they are not intended to regulate the investment of MIT's endowment.

The Committee created two tools, which should be used by Resource Development staff, MIT faculty, and other MIT community members involved in the gift or engagement process at the earliest stages of the process:

1. The “individuals tool,” which should be used for gifts from or engagements with: (i) specific individuals, or (ii) foundations whose funds come from a single person, couple, or nuclear family.
2. The “organizations tool,” which should be used for gifts from or engagements with all organizations, including: (i) companies, (ii) non-profits or non-governmental organizations, (iii) foundations where the money comes from multiple individuals, or (iv) governments or government departments or ministries.

Along with these tools, we suggest the creation of one or more new ***standing committees***, hereafter referred to as the “Standing Committee,” to help resolve ambiguous cases. The tools will be filled out by everyone on the Standing Committee for cases that involve deliberation and/or appeal.

The structure of the tools is based on a set of traffic lights. We created two sets of questions, grouped as “red lights” and “yellow lights.”

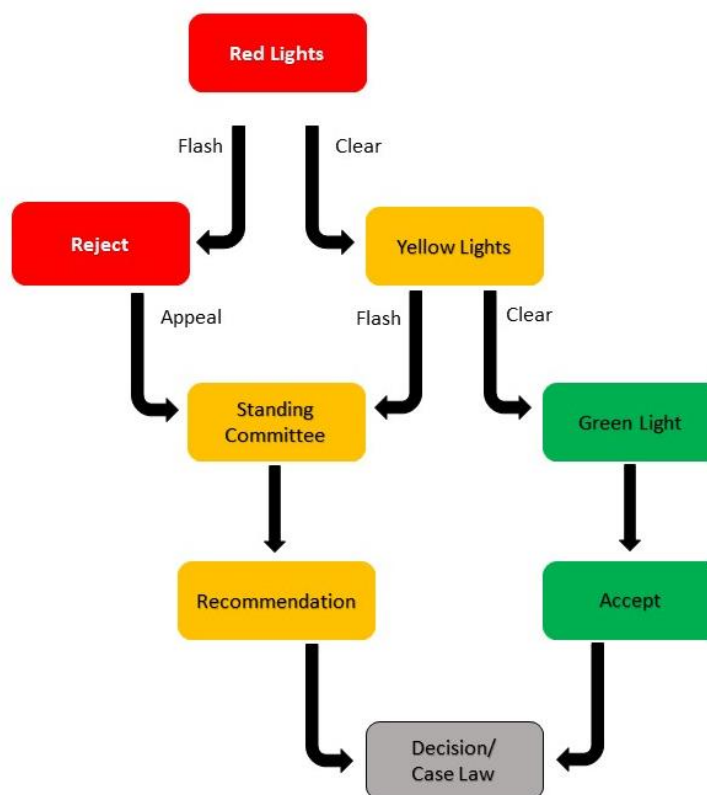
A red light flashing should, as red lights do, stop action. The metaphor of a red light implies automatic rejection of the gift or engagement. If, however, somebody using these tools recognizes mitigating circumstances for a red light violation, they can appeal the rejection to the Standing Committee for deliberation and a recommendation.

If there are no red lights flashing, consideration proceeds to a set of yellow lights. If any of these flash, the engagement is sent to a Standing Committee for deliberation and adjudication. If none of the yellow lights flash, then the gift or engagement gets a green light and can be accepted or entered into. **Figure 9** illustrates this basic structure.

Importantly, the distinction between red and yellow lights is not a designation concerning the importance of issues. Instead, it signals how easy or hard it is to define the problem or draw clear lines.

The use of the tools, and the ultimate recommendations from the Standing Committee, should be recorded with majority and (if needed) minority opinions. In addition, the Standing Committee will record a short summary of what questions (that is, which of the red and/or yellow lights) drove the ultimate decision. We recommend that, over time, these recommendations and from the Standing Committee will create and develop precedents and local MIT **case law** through archiving and chronicling the tools, the corresponding recommendations from the Standing Committee and the final decisions on the gift or engagement. We discuss this notion of case law and the Standing Committee in more detail in [Section 6](#).

Figure 9: Basic Structure of Tools



The tools are accompanied by reference information that describes what the various red and yellow light questions mean. The explicit text of the proposed tools and accompanying reference information are included in [Appendix 6](#), which also includes additional structure for filling in the tools (like skip logic) and for recording the decisions.

We imagine that the tools may need to be updated in the future, either to remove traffic lights that are redundant or to add lights that we may have missed (or to address new issues that arise in the future). Additionally, it may be that some (or perhaps even all) of the red lights are ultimately more yellow lights than red (or vice versa) and should be moved to that section of the tools. We recommend that the Standing Committee, therefore, also be tasked with a periodic review of the tools themselves.

5.1 INDIVIDUALS TOOL

The individuals tool is structured around the following red and yellow lights.

5.1.1 Red Lights

There are four red light questions, in distinct areas. Any violation of these red lights automatically rejects the gift or engagement, unless there is an appeal to the Standing Committee as described above.

1. Has this individual directly engaged in, funded, or otherwise supported any activities that compromise U.S. national security?

A national security risk is sometimes highlighted by the U.S. Government through black-listing senior officials in companies, companies themselves, governments, and organizations, as well as individuals (e.g., through sanctions). We identify intense security risks to include terrorism, espionage, treason, attempts to violently overthrow the U.S. Government, threats against critical infrastructure, violation of export controls or sanctions, and industrial espionage aimed at undermining the military and technological capabilities of the United States. It is important to note that some activities that might be regarded as undermining U.S. national security may not be crimes, and people who do not appear on specific blacklists may still meet MIT's definition of individuals who have undermined U.S. national security. MIT has a [Washington Office](#), which should be consulted for advice on this issue when necessary, and the [MIT Office of the General Counsel](#) will have useful expertise. We also refer users of the tools to the [legal definition of national security](#) and to the [National Security Strategy of the United States of America](#).

2. Has this individual directly engaged in, funded, or otherwise supported any gross violations of political, civil, or human rights; or serious violations of the laws of war?

Political rights include procedural fairness in law, such as the rights of the accused, including the right to a fair trial; due process; the right to seek redress or a legal remedy; and rights of participation in civil society and politics, such as freedom of association, the right to assemble, the right to petition, the right of self-defense, and the right to vote.

Civil rights include ensuring people's physical and mental integrity, life, and safety; protection from discrimination on grounds such as race, gender, sexual orientation, national origin, color, age, political affiliation, ethnicity, religion, and disability; and individual rights such as privacy and the freedom of thought, speech, religion, press, assembly, and movement.

For human rights, although not formally defined in international law, "gross violations" denote types of violations that affect in qualitative and quantitative terms the most basic rights of human beings, notably the right to life and the right to physical and moral integrity of the human person. These sorts of gross human rights violations are often the types of violations that are considered illegal under U.S. law. It is generally assumed that genocide, slavery and slave trading, murder, enforced disappearances, torture or other cruel, inhuman, or degrading treatment or punishment, prolonged arbitrary detention, deportation or forcible transfer of population, and systematic racial discrimination fall into this category. Deliberate and systematic deprivation of essential foodstuffs, essential primary health care, or basic shelter and housing may also amount to gross violations of human rights. An excellent reference for what amounts to a gross violation of internationally recognized human rights is the [U.S. legal code on human rights and security assistance](#).

Serious violations of the laws of war parallel gross violations of human rights, but they apply to non-state actors (such as insurgents or *de facto* governments that have not been internationally recognized).

3. Does this gift or engagement restrict the academic freedom or autonomy of MIT faculty, students, or staff?

We define academic freedom as freedom at all stages of inquiry—the framing of research priorities and questions, the execution of research, and the dissemination of findings—as well as free and open academic debate on campus. No source of financial support, whether it be an individual or an organization, should have undue influence at any stage of the research process or a stifling effect on MIT’s intellectual climate. A hypothetical example of a gift or engagement that violates academic freedom would be one that explicitly prevented MIT from working on certain research questions, or demanded that specific questions become the subset of faculty research.

4. A. Has this individual engaged in conduct that constitutes a felony under U.S. federal and/or state law?

B. If yes, are there mitigating circumstances? If no → red light, if yes → yellow light.

Note that the red light uses “engaged in” a felony as opposed to “convicted of” one to allow for the fact that some crimes are pleaded down to lesser offenses, and some criminals are known to have skirted charges or convictions in their home countries. In addition, the red light includes behavior that is subject of a civil action that could also be subject to a criminal action under the law. For these cases, and others with less clarity, we suggest reaching out to the [MIT Office of the General Counsel](#) for expertise in reviewing the specific case documents.

Mitigating circumstances could include evidence that the individual has served their sentence and has sincerely tried to make amends, legal amendments have rendered the original conduct non-criminal, etc.

5.1.2 Yellow Lights

There are nine yellow light questions, categorized into three distinct areas: a conflict with our core values, transparency around the decision (that forces us to reflect on the court of public opinion), and alignment with our mission. These yellow lights are as important as the red lights, but it is harder to draw a clear line around some of the possible violations, and they will therefore require deliberation. Any violation of these yellow lights sends the gift or engagement to the relevant Standing Committee for a recommendation.

Conflict with MIT’s Core Values

5. Does engaging with this individual or accepting this gift negatively impact our ability to promote MIT’s core values on our own campus or in our own community?

It is important to highlight how this particular yellow light is phrased. We do not ask if the individual’s values conflict with ours, as that would be an extremely high bar indeed. Instead, we ask if the disconnect between their values and ours negatively impacts our ability to promote our own values on our campus or among our community. Ultimately, the question is whether accepting a particular gift, or entering a particular engagement, will undermine our ability to invest in our own values in our community. This is an important distinction.

6. Could the association with this individual damage MIT’s reputation for excellence in research and teaching; and thus, ultimately, its core mission?

This question should be thought of as requiring an explicit articulation of exactly how the association with the particular individual would damage MIT’s reputation for excellence in research and teaching, and tying the possible damage back to our mission.

7. If the gift or engagement involves naming, will using their name in such a public way on our campus negatively impact our ability to promote MIT’s core values on our own campus or in our own community?

By naming, we refer to naming anything at MIT: buildings, rooms, fellowships, etc. There was a strong consensus among the Committee members, also expressed across the community during our open sessions, that the bar for naming should be higher, hence the additional question around naming. The effect of naming something after an individual goes beyond the subset of the community directly involved in the gift or engagement and affects the MIT community far more broadly and over a longer time. It may also be perceived as MIT not only thanking but also *honoring* the named individual. Hence, the Committee felt the need for an extra step of deliberation here.

Transparency about the Decision

8. If you were a representative of MIT, would you be willing to publicly disclose taking money from or engaging with this individual?

This question and the next two are intended to require us to reflect on the potential ethical and reputational risks involved, including any not covered by earlier questions. Here, we highlight that these questions are not meant to reflect how an individual at MIT may feel about the gift or engagement, but instead should be thought of as requiring an explicit articulation of the reasoning that drives a “yes” answer to the question. In addition, as mentioned earlier, answers to these questions should not express mere like or dislike of the political opinions of the donor or collaborator, but should be grounded in the considerations identified by the values statement and these guidelines.

9. If you were a representative of MIT, would you be willing to publicly defend taking money from or engaging with this individual?
10. If you were a representative of MIT, would you be willing to allow this individual to visit our campus and meet faculty, students, or staff?

Correspondence with MIT’s Mission

11. Does this gift explicitly advance MIT’s fundamental mission for education or basic and applied research?

Some proposed gifts or engagements may be irrelevant or tangential to MIT’s mission, whereas others may substantially help MIT advance its mission. A hypothetical example of one that may be tangential to the MIT mission would be a center at MIT that distributes all its resources to organizations or individuals outside MIT (i.e., MIT is just a pass-through for the funds or a branding opportunity for the donor).

12. Could this gift or engagement impede our ability to best serve the nation and the world?

Some engagements or gifts could lead MIT to undertake or contribute to activities that are *prima facie* undesirable for the world. We should avoid such situations. The Committee recognized that certain engagements might be viewed as potentially detrimental to the United States (at least in a relative sense), even if they served the world as a whole, or the reverse. This issue produced extensive debate and deliberation in the Committee. The Committee recognizes that MIT is a U.S. institution, with long-standing and deep ties with the United States and the U.S. Government. At the same time, the Committee prizes MIT's institutional autonomy, highly values the cosmopolitan and international nature of the MIT community, and views international engagement as essential to MIT's continued excellence. Furthermore, MIT has a commitment to the education of people around the world, to international research collaborations, and to the free dissemination of scientific knowledge. The Committee believes that MIT is far better able to achieve our mission through international cooperation and engagement—and through celebration of international norms of open scientific research—than in isolation or narrow construction of the perceived U.S. national interest.

How to capture this reasoning in the guidelines generated further debate within the Committee. A small minority in the Committee (4 of the 18 members) felt that the tool should include an explicit prioritization of doing no harm to the United States, and hence recommended splitting this question into two parts: one for the United States, and one for the rest of the world. The majority argued against explicitly prioritizing the United States in that way. Ultimately, the Committee chose to phrase this yellow light using the language taken directly from the MIT mission statement.

13. Could this gift or engagement have the effect of committing MIT to promote a specific dogma or political agenda in a way that is inconsistent with maintaining our academic integrity or our commitment to our core mission to promote knowledge creation and education?

The intent of this yellow light is to screen against an attempt to corrupt the open inquiry and educational mission of MIT. Academic research is open and debatable: It involves unanswered questions, rather than unquestioned answers.

This yellow light is best illustrated with an example. A peer school was approached by a donor who sought to create a new center for American politics, of the type the donor had already created at other American universities. The donor required that the center director be hired in consultation with the donor, and that she start and serve as editor of her own journal. Upon further investigation, it was determined with reasonable certainty that the donor was attempting to stock American universities with a particular ideology by ensuring that the center members would be publishing peer-reviewed papers. The Committee felt strongly that such efforts would corrupt MIT's mission.

Another example would be gifts or engagements that included explicit or tacit agreements *not* to research certain subjects or *not* to engage in certain types of otherwise appropriate scholarly activities. Again, any such arrangement would undermine MIT's commitment to free and open inquiry.

5.2 ORGANIZATIONS TOOL

The organizations tool is meant to be applied to non-individual gifts and engagements. It covers any gifts from and any engagements with organizations—i.e., companies, non-profits, non-governmental organizations, governments, and foundations where the money comes from more than one individual.

The organizations tool also uses a similar set of red and yellow light issues. However, for each of the issues, we thought carefully about **who** (or what) would be the subject of each red and yellow light: someone in the organization (if yes, who?), or the terms of the actual engagement with or gift from the organization? In deliberating about this, we found it useful to define precisely what we mean by a partner before specifying which red lights and yellow lights applied to the partner, and which red and yellow lights should be applied to the gift or engagement itself. This definition of the partner is crucial in using the organizations tool, as we use a very specific and somewhat narrow definition of who the partner is for these purposes.

Partner Definition:

For corporations, non-profit, or non-governmental organizations and foundations, the “institutional partner” referred to in the tool represents the leadership and decision-making authority of the organization—i.e., the C-suite/senior executives (but not every member of the board of the organization). For a subsidiary of a larger organization, the “institutional partner” refers to the leadership of the relevant subsidiary. For governments, the “institutional partner” is the decision-maker in the specific ministry/minister or department that the gift is from/engagement is with (and not usually the government as a whole).

It is worth reiterating that, as with the individuals tool, with this partner definition, we do not think of the organizations tool as splitting the world into “good” countries and “bad” countries. A country is not an organization and can never be a partner for the purposes of how we define a partner; and, therefore, for how we intend the organizations tool to be used.

Also note that there are some important differences between the individuals and the organizations tools. Not all red and yellow lights apply to the partner or to the gift or engagement, since some of them do not make sense when applied to the partner, and others do not make sense when applied to the gift or engagement. For example, it is not possible for the partner to violate academic freedom, but the gift or engagement itself could. An important second example is that the U.S. law red light applies to the gift or engagement and not the partner.

Figure 10 summarizes whether each red light applies to the partner, the gift/engagement, or both. The same information is provided for yellow lights in **Figure 11**. In the description of the actual red and yellow lights, we rely on what we articulated for the individuals tool and only make additional notes as needed.

Figure 10: Application of Red Light Considerations for Organizations

Red Lights	Applies To
U.S. national security	Gift/engagement and institutional partner
Gross violations of political, civil, or human rights	Institutional partner and the partner’s policies and their enforcement

Restricting academic freedom or autonomy of MIT faculty, students, or staff	Gift/engagement
U.S. law	Gift/engagement

Figure 11: Application of Yellow Light Considerations for Organizations

Yellow Lights	Applies To
Conflict with MIT's core values (including damaging MIT's reputation)	Gift/engagement and institutional partner
Transparency about the decision	Gift/engagement and institutional partner
Correspondence with MIT's mission	Gift/engagement

There may well be cases of donors or engagements for which it is hard to decide which tool applies best: the individuals or the organizations. Given that the structure of the questions is very similar across the two tools, what is critically important is that one of the tools be completed; one should not get hung up on which of the tools is the more exact fit. Over time, we will build best practices concerning which tool is used for which specific types of cases. For example, for a foundation in the name of an individual who is no longer alive, the organizations tool should be used. For some corporations, one may feel the individuals tool is more appropriate. However, we should highlight that the organizations tool would flag exactly the same issues; so for such cases, it ultimately would not matter too much which tool was completed, as long as one was used. **Figure 10** and **Figure 11** may also be helpful in deciding whether the organizations tool is the best tool for the specific case at hand. Ultimately, the organizations tool should be used if one needs to evaluate both the institutional partner and the gift or engagement itself.

5.2.1 Red Lights

1. Has this **institutional partner** engaged in, supported, or funded any activities that compromise U.S. national security?
2. Does this **gift or engagement** involve any actions or activities that compromise U.S. national security?
3. Has this **institutional partner** directly engaged in, supported, or funded any gross violations of political, civil, or human rights?
4. Do the **institutional partner's policies** and their enforcement in this engagement involve a gross violation of political, civil, or human rights?
5. Does this **gift or engagement** restrict the academic freedom or autonomy of MIT faculty, students, or staff?
6. Does this **gift or engagement**, or actions or activities involved in this engagement, violate U.S. federal and/or state law?

5.2.2 Yellow Lights

Conflict with MIT's Core Values

7. Does this **gift or engagement** negatively impact our ability to promote MIT's core values on our own campus or in our own community?
8. Does engaging with this **institutional partner** negatively impact our ability to promote MIT's core values on our own campus or in our own community?
9. Could association with this **institutional partner** damage MIT's reputation for excellence in research and teaching; and, ultimately, its core mission?
10. If the **gift or engagement** involves naming, will using their name in such a public way on our campus negatively impact our ability to promote MIT's core values on our own campus or in our own community?

Transparency about the Decision

11. If you were a representative of MIT, would you be willing to publicly disclose the details of this **gift or engagement** with this partner?
12. If you were a representative of MIT, would you be willing to publicly defend the judgment to engage with this **institutional partner** in this engagement?
13. If you were a representative of MIT, would you be willing to allow this **institutional partner** or any non-MIT persons involved in this engagement to visit the campus and meet with faculty, students, or staff?

Correspondence with MIT's Mission

14. Does this **gift or engagement** explicitly advance MIT's fundamental mission of education and/or the conduct of basic or applied research?
15. Could this **gift or engagement** impede our ability to best serve the nation and the world?
16. Can it reasonably be assumed that this **gift or engagement** will require MIT, or members of the MIT community, to promote a specific dogma or political agenda in a way that is inconsistent with maintaining our academic integrity or our commitment to our core mission to promote knowledge creation and education?

5.3 STRESS TESTING THE TOOLS

The Committee conducted two rounds of stress testing on the tools, using real cases. The first round was conducted with the first draft of the tools and involved three cases provided to us by the Recording Secretary, Julia Topalian. The case material provided included detailed information on the donors in the form of their Wealth-X reports (a paid-for service—see [Appendix 9.7](#) for a list of such companies used by MIT). Every member of the Committee filled out the draft tools for each of these three cases. We then

aggregated the responses and discussed the results. We used these results, and subsequent deliberation, to update the tools quite substantially to arrive at the final draft of the tools presented in our report.

Using the final draft of the tools, we then conducted the second round of stress testing. For this, we requested cases from the Vice President for Research (VPR), Maria Zuber, and the Associate Provost, Krystyn Van Vliet. From the VPR, we were given six gift cases: five for individuals, and one for an organization. From the Associate Provost, we received ten “generalized cases” for engagements that were sometimes quite specific (applying to just one instance) but representative of a type of collaboration that is not unique but instead recurring. The information shared on these cases was much less detailed than what was considered in the first round. We had approximately a half-page summary of data for each, identifying all the contentious issues concerning the particular donor or engagement. We ran the sixteen cases through the tools, resulting in strong agreement on the green- and red-light cases (close to unanimous). There was less agreement on the yellow lights, but we expected that dissensus as those are the areas in which it is harder to draw lines.

Finally, we should note that in a couple of cases, there was insufficient information to complete the tool, which underscores the importance of providing the Standing Committee with enough information to fill out the tools.

6 GUIDELINES: THE STANDING COMMITTEE AND CASE LAW

We recommend the Standing Committee be consistent with the notion of broad representation from the MIT community and the principles of faculty governance and be advisory to the Provost and the President.

Our committee was charged with developing values and guidelines for gifts and outside engagements. Designing processes for their implementation is outside of our charge and was not a focus of our activities. The Processes Committee, convened by Provost Schmidt and chaired by Professor Fisher, was tasked to make recommendations on improving the processes for soliciting and accepting gifts, specifically, but not for engagements. Throughout this report, we refer to the Standing Committee, but highlight that the Processes Committee recommends such a committee for gifts be called the “Gift Acceptance Committee” (GAC) and have the specific structure they recommend.⁴

We expect that all the recommendations concerning the Standing Committee will apply to any Standing Committee that looks at gifts or engagements. A recommendation on whether there should be one Standing Committee or two (one for gifts and one for engagements) is beyond our charge. However, we encourage the administration and the Chair of the Faculty to clarify this as well as how process considerations for engagements will be handled, including where the boundary should be drawn for engagements to require a tool to be completed, in a similar way as the Processes Committee did for gifts.

⁴ The Processes Committee envisions the GAC as a replacement for the current Interim Gift Acceptance Committee (IGAC), which was created in late 2019 to review the cases that meet certain size thresholds. The IGAC membership is: the Provost, the Vice President and General Counsel, the Vice President for Finance, the VPR, Vice President for Resource Development, and the Associate Provost for International Activities. The Processes Committee also recommends that the Provost and a Faculty member Co-Chair the GAC and that the GAC include: 5 faculty members, chosen through faculty governance; 1 graduate and 1 undergraduate student; 1 postdoctoral fellow or associate; the CEO of the Alumni Association; the Vice President and General Counsel; the Vice Presidents of Resource Development, Research, and Finance; and the Recording Secretary as committee staff.

We emphasize the importance of confidentiality on the Standing Committee. All information, tools, discussions, and deliberations (including the case law) should be treated as highly confidential. This is essential to the integrity of the entire process. The Processes Committee also notes the importance of this issue and discusses it in more detail in its report, including highlighting the MIT processes available to handle breaches in confidentiality.⁵ In addition, for the purposes of transparency, the Processes Committee recommends specific procedures for the GAC to report out to the community.⁶ We refer readers to the Processes Committee report for more detail. In addition, we suggest that after a year of the Standing Committee operating, there should be a review of how well it is working.

6.1 CASE LAW

We use the phrase “case law” to describe the collection of past decisions. This is critically important both for fair and consistent decision-making, and for ensuring the efficient and expedient processing of cases that need deliberation. Importantly, case law provides the ultimate decision-makers with protection: if they have to justify any decision in the future, there is written record of what the Standing Committee recommended and why. The case law will be completely de-identified, but it will have a record number to enable the Senior Team to go back to a specific decision and review the supporting information.

Since the Standing Committee is essential for implementation of our suggested guidelines and for assembling case law, we share our view on the use of the tools by the Standing Committee as well as considerations for building case law.

When a case comes to the Standing Committee, all members of the Standing Committee will fill out the tool before deliberation, with all the relevant information in hand. After collaborative deliberation to arrive at a recommendation, the completed tools and the final recommendation should be archived, along with a majority opinion and, if needed, a minority opinion. The opinions should explicitly highlight which particular red or yellow light questions led to the majority (and minority) opinions on the committee. The archive of the completed (retained and recorded) tools, and the accompanying recorded majority/minority opinions and ultimate recommendations of the Standing Committee, will form the basis of the body of local case law. In addition, the final decision made by the President should be recorded into the case law. As the Processes Committee explicitly recommends, if the President overrules a majority recommendation from the Standing Committee, they must provide the Standing Committee with a written explanation that becomes part of the case law.

Of course, we do not expect that any particular cases are exactly the same as any others; but the key function of the case law is to build a history of how the tools are applied and to identify some patterns among the situations. As we saw in our stress testing, there is considerable commonality across cases, especially in the applicability and usability of the tools.

In addition to the requirement that the information provided to the Standing Committee, as well as its deliberations, be held in extreme confidentiality, we recommend that the case law itself be treated as

⁵ The processes for faculty are outlined in [MIT Policies and Procedures Section 3.4.2](#)). Students are referred to the [MIT Committee on Discipline](#), and staff to [MIT Human Resources](#).

⁶ The Processes Committee recommends the following report out for the GAC: at a faculty meeting annually, with descriptions of the overall caseload of the GAC; the recommendations made by the GAC; what fraction of the recommendations were accepted by the President and the Provost; and any changes made in the tools.

highly confidential. We recommend that the completed tools and the case law be de-identified—i.e., not include the name of the donor or organization (just a date and record number)—to preserve anonymity. However, we also understand that information on the donor may give away their identity, so it is absolutely essential that the case law be sequestered and protected, and any members of the Standing Committee having access to it must treat it as highly confidential, with similar penalties as those used for the deliberations of the Standing Committee described above. Ultimately, the Recording Secretary's Office and the Standing Committee are joint keepers of the case law. They must ensure its confidentiality.

All the case law should be created de novo. We do not recommend going back to audit past cases. Those cases were not deliberated under the guidelines or the governance systems recommended by the Committee and the Processes Committee. In addition, we suggest that individuals in the community be allowed to appeal cases to the Standing Committee, as highlighted extensively in the Processes Report. A summary (and anonymized version) of the existing case law should be provided to the appellant as needed. However, cases themselves, and the case law, will never be available to the public.

Another important consideration involves historical dynamics. The Standing Committee's decisions should be revisited—and case law updated—when new information becomes available. We recommend important consideration be given to these dynamics.

6.2 INFORMATION AND EXPERTISE

The Standing Committee must be assured access to correct and sufficient information on all donors or partners under discussion, as it will need the information to make efficient decisions and to be able to build local experiential case law. We should highlight that such information is already collected on all donors and partners—we are not recommending any change in the information collected or used.

The Committee does recommend, if possible, creating a single source/database of collated information that we suggest be housed in and tasked to [Resource Development's Office of Prospect Development](#).⁷ As background, the Office of Prospect Development is responsible for gathering and analyzing information about possible donors, and for providing tools to the community for sharing and using that knowledge. The Office of Prospect Development archives historical donor information and describe its role as “stewards of MIT's fundraising institutional memory.” This office already has access to and uses a wide variety of resources beyond obvious sources like the internet and news reports (see [Appendix 7](#)), at least one of which has particular expertise in assessing risk. It also relies on the [Office of the General Counsel](#) to track down court outcomes, settlements, etc. The [Industrial Liaison Program](#) also regularly vets companies for membership and coordinates closely with Office of Prospect Development. They also have immense expertise and experience in considering the information collected. In turn, the office should make sure it has the processes set up to enable dynamic checks on all existing individual donors and organizations. If there is any change in information that would activate a new red or yellow light in the guidelines, the Office of Prospect Development should bring it to the attention of the Standing Committee

⁷ From the Resource Development website: “The Office of Prospect Development, which resides within the Resource Development Strategic Information Management office, contributes to the fundraising efforts of the Institute by collecting, analyzing, and disseminating information to direct and inform solicitation and engagement strategy for prospective donors. Prospect Development promotes a culture of donor-centric fundraising to build meaningful donor relationships and strong philanthropic connections to the Institute. The office comprises four units: Prospect Research, Prospect Management, Prospect Data Integrity, and Philanthropic Due Diligence.”

immediately. The Standing Committee should then decide if the change in information is of the nature to stop the gift or engagement entirely, if the gift or engagement should be continued but not renewed, or if there should be no change.

Finally, the Standing Committee may need appropriate expertise to process information correctly and expediently, especially in the case of international engagements and when information on the red light and yellow light areas cannot easily be found in the standard sources. There is a vast amount of relevant expertise among our faculty, staff, and students; and we encourage the Standing Committee to be inclusive and to reach out to tap this expertise. As of March 1, 2020, our faculty “were leading or co-leading about 2000 internationally-sponsored projects, involving 72 countries... [and] our student body, which today includes 3400 undergraduate and graduate students from 119 foreign countries” (from Richard Lester in the May/June 2020 Faculty Newsletter). While working with international collaborators or in other nations can provide valuable experiences, there are members of our faculty for whom the politics, economics, industries, and cultures of national and international communities are their specific areas of study. They may have worked with relevant or related partners before, they may have localized information on the individuals or partners under discussion, or information about the local context that affects the evaluation of the engagement or partner. Reaching out to such scholars who are subject matter experts should be a first step in difficult cases (but with appropriate consideration given to confidentiality). Furthermore, the Standing Committee should incorporate, but not solely rely upon, information from international organizations like the United Nations, Amnesty International, the World Bank, the International Labour Organization, and the International Criminal Court. The Standing Committee may also want to touch base periodically with the [MIT Corporation’s Risk and Audit Committee](#).

In cases where there is simply no information available, we suggest leaning towards taking the gift or entering in the engagement, as long as every effort has been made to acquire the relevant information on the individual or the organization, and the identity of the person or organization is verifiable. For example, if an individual claims to have vast wealth, it is unlikely that there is no information available on that individual (and potentially grounds for further investigation if there is not). This should be brought to the Standing Committee’s attention.

6.3 OVERALL IMPACT OF THE GUIDELINES

Admittedly, these guidelines may raise worries about MIT not being sufficiently quick and nimble in evaluating and accepting gifts and engagements, which is crucial for research and our mission in general. We also may worry about the financial impact the guidelines and Standing Committee may have both now, as well as on future donors. We see this report, and eventually the Standing Committee, as representing the collective wisdom of the MIT community and, importantly, as providing a more robust and deliberative way to balance costs and benefits. The overarching objective is to sustain MIT over the decades—centuries, even—while at the same time positioning the institution to live and thrive according to its values. One clear benefit of living by our values will be reduced exposure to reputational risk and the associated liabilities. Case law provides us with protection: The risk of any decision will no longer be held by a single person or a few people in the administration. Instead, the community as a whole will be responsible, absorbing the risk of any decisions. These are the benefits.

The costs include perhaps some lost resources (gifts and engagements) and some delays. We think of the costs as similar to an insurance premium—i.e., we are purchasing a reduction in risk, which will necessarily have some associated costs. Like insurance, the tools and the Standing Committee are necessary investments. The questions are: How big are the costs, and are they in proportion to the reduction in risk?

First, concerning the financial impact, indeed, we can expect to lose some donors and collaborators with whom we choose not to engage. However, we also may well inspire others to become involved, especially our alumni. Being perceived as a principled institution likely will lead to new donors and engagements, and firmer commitments from the donors and collaborators we wish to see. The Committee estimated⁸ how much money in gifts we would lose from using these tools, based on applying our current recommendations as well as those from the Processes Committee. This number comes to 3.2% of our annual gifts. The gains we may receive from inspiring new donors is harder to measure, but they will only reduce the financial costs. We did not run this calculation for engagements, as we would need a suggested process for engagements (outside the scope of the Processes Committee's charge) to do so.

Second, on the time cost, the Committee believes that this is a short-term cost. Initially, at startup, the new process may be slower than members of our community may be used to. However, repeated practice will move us to a future where most decisions will be driven by precedent, based upon the body of case law, and thus will become speedy, without requiring elaborate deliberation. Those cases that are not guided by past practice will be fewer, as we will be ever adding new precedents to the existing corpus of cases. It may even be the case that the Standing Committee meets only at the request of Resource Development or faculty, once we have enough case law built. We also anticipate that there will be efficiency gains in information gathering, as it will be more targeted towards the issues that the tools cover, which will ultimately save time.

We can estimate the workload for the Standing Committee (again, just the workload for gifts). Using estimates of how many cases the IGAC evaluates every time it meets, we approximate that the cases to go before the Standing Committee could be dealt with in ten meetings. If the Standing Committee met every two weeks, it seems to be an easily manageable workload.

While we think the above estimates are reasonable, they do not, of course, guarantee that the financial and time costs will be low. We are therefore cognizant of the potential need to experiment with the implementation of the two committees' recommendations.

Ultimately, it is true that there will be some costs, but we cannot get a reduction in risk exposure without cost. As an insurance premium, 3.2% per annum sounds eminently reasonable,⁹ and it seems a small cost to pay for the gain in excellence and reputation that will come from investing in our values by explicitly tying our gifts and engagements to those values.

⁸ To estimate this, we used data on: (i) the number of gifts larger than \$50,000 (the gift size triggering tool use, based on guidelines from the Processes Committee), (ii) the value of these gifts, (iii) an estimate from Resource Development staff on the Processes Committee about what fraction of gifts would get a green light from the tools, and (iv) the estimate of what fraction of red and yellow light gifts were ultimately recommended for rejection from our stress test of the guidelines.

⁹ Of course, the insurance premium should be the cost, relative to the value of the asset at risk, which is ultimately MIT's reputation. As we have no way of assessing the value of that, we report it here as the fraction of our annual gifts.

7 ADDITIONAL ISSUES AND CONCERNS

7.1 EDUCATION

Both in the Committee’s deliberations and in our interactions with the broader MIT community, it became clear that although we have developed a set of values and guidelines for our gifts and engagements, there will need to be an accompanying investment in educating our community on our values and principles, and on what the guidelines mean and how they are interpreted and implemented. While we have created two tools to be used, even coding them into software for use, that is far from enough. For these tools to be used most effectively, they will need to be accompanied by an outreach to our community on how to use them. The Processes Committee discusses all the aspects of education needed in more detail; we refer you to their report. We also urge the Values committee (described in [Section 4](#)) to consider seriously the values articulated here and to develop not just common language that clearly states our values, but also to suggest ways that members of the MIT community can advance these values both on and off campus. We encourage the administration to consider creating a training video or simulations on these guidelines and tools. Members of the Committee would be happy to help with this.

7.2 CONFLICTS OF INTEREST

In some of the campus conversations and white papers, and in emails directly sent to the Committee, members of the community expressed hope that the Committee would address Conflicts of Interest (Col) in our deliberations and report. There is a wide variety of possible Col issues, and we felt that such Col issues would require efforts of another entire committee to appropriately address. We hope the Institute’s faculty governance could either constitute a committee to look into these issues or ensure that these issues are under the purview of an existing committee. We are aware that there is currently a subcommittee under the Committee on Intellectual Property tasked with looking into Col issues. It may be worth making that subcommittee a separate committee of its own, given the extensive nature of Col issues and the importance of addressing them as soon as possible, as recent debates over gifts and engagements have revealed.

7.3 ANONYMOUS GIFTS AND ENGAGEMENTS

Part of our charge requested that we collect feedback from the community and discuss whether MIT should accept anonymous gifts. There was strong consensus that a donor should be allowed to remain anonymous to the MIT community and the public, should the donor so desire (of course, the backstage administrative processes require that the transaction is recorded, but that should be protected if the donor asks for anonymity). Individuals may wish to remain anonymous for a variety of personal reasons, including religious beliefs, a desire not to be approached for donations by others, etc. These reasons should be respected. However, there was consensus in our discussions that MIT-initiated anonymity should not be allowed, consistent with the principle articulated in the guidelines on transparency that we should be willing to disclose and defend donations. In addition, the anonymity of the donor should have no impact on the decision to accept a gift or enter into an engagement.

7.4 TRANSPARENCY IN PROCESSES AND DECISION-MAKING

During our deliberations as a community, and in our feedback-gathering processes, several important issues arose concerning transparency. Throughout, as can be seen from the discussion of the feedback from the community, a particular form of transparency was raised as being an important value: transparency around processes and decision-making. In applying this value to our guidelines, we focused on the court of public opinion and how that may affect our decision to accept a gift or enter into an engagement. However, there are four additional dimensions of transparency that arose in the discussions that warrant mention, even if they cannot be expressed as part of our guidelines.

First, we heard that members of the community would like the uses and the distribution of gifts to be transparent, clear, and easily known. In other words, they would like to know how particular gifts are used and distributed within the MIT community, as well as the governance processes that lead to these decisions on distribution. We highlight the recommendation from the Processes Committee that there be an effort to educate our entire community about how fundraising works at MIT.

Second, it seems clear from the feedback we gathered, interactions with the community, and deliberations within the Committee that there is wide variation across our community in the understanding of our finances and the endowment: how it is both raised and spent. We described some of those financial matters early in this report, albeit briefly, but we join the Processes Committee in recommending that the administration regularly engage with our community and share these facts around fundraising and the use of funds. For example, there is a widespread perception that there exists immense inequality across campus in both access to donors as well as access to the funds themselves. We believe that one of the most important steps in building trust within the community is to be as transparent with the community as possible around these issues. The Processes Committee discusses this in more detail in its report; we simply emphasize the importance of their recommendations related to this.

Third, we encourage all faculty and researchers to be transparent about the sources of funding for their research. This is usually reported in the acknowledgements of academic papers, but we encourage faculty to name all their funders transparently on their research websites, except for situations where the donor requires anonymity.

Fourth, we encourage faculty to be transparent with their incoming graduate students on the sources of funding for their research labs and infrastructure. This would allow graduate students to make fully informed choices about which labs or research groups they want to join.

8 STUDENT COMMITTEE

As noted earlier, the Committee's charge required standing a parallel Student Committee on Outside Engagements to deliberate the same issues as the Committee, to provide input to the Committee, and to produce its own report. For the Student Committee, the Undergraduate Association approved 6 members, as did the Graduate Student Council, in mid-November 2019, for a total of 12 members. The Student Committee is chaired by Peter Su and Mahi Elango. The full initial membership, and any changes, are detailed in the report produced by the committee, included in this report as [Appendix 8](#).

9 APPENDICES

9.1 APPENDIX 1: DETAILED CHARGE AND MEMBERS OF THE COMMITTEE

9.1.1 Charge

The charge to the Ad Hoc Faculty Committee on Guidelines for Outside Engagements (“the Committee”) is to define a set of values and principles, consistent with MIT’s mission, to guide the assessment of outside engagements. Outside engagements include grants, gifts, and any other associations and collaborations involving MIT with governments, corporations, foundations, or private individuals, domestic or foreign. The Committee will produce a set of guidelines to be employed by the MIT decision-makers in ways that will be defined by the Ad Hoc Faculty Committee on Gift Processes (“Processes Committee”) for the evaluation of potential outside engagements.

A Subcommittee on International Engagements has been appointed from among the membership of the Committee. This subcommittee will hold meetings (in addition to those of the main Committee) at which issues specific to international engagements will be considered. The subcommittee will provide an interim report on guidelines for international engagements by January 31, 2020 to the International Advisory Committee and the International Coordinating Committee for use in evaluating urgent pending international engagements.

The Committee will issue its overall report to the MIT community during Spring 2020.

The Committee will work in conjunction with the Processes Committee being convened by the Provost. Several members of the Committee, including its chair, will sit as voting members of the Processes Committee to facilitate communication and ensure coordination in their work.

The report of the Committee will include the following components:

- A discussion of MIT core values that are the basis for evaluating problematic engagements.
- Guidelines for use by MIT individual faculty, administration, and relevant staff and committees in determining whether proposed engagements with governments, corporations, foundations, or private individuals are acceptable. The process through which such guidelines are implemented will be developed by the Processes Committee being convened by the Provost. That committee will consist of representatives of both the faculty and administration, including several members of the Committee.
- The International Engagements Subcommittee will provide additional guidelines specific for engagements in and with countries with problematic political, civil, and human rights records.
- The report will also discuss general principles relevant to evaluating and undertaking outside engagements, such as under what conditions, if any, anonymous donations can be considered.

To inform their deliberations, the Committee will gather input from the MIT community via meetings with departments and through extensive focus groups across campus, including one or more in each school.

Other focus groups will include representatives from departments, labs, and centers, students, postdoctoral fellows and associates, alumni, and non-faculty instructors and staff.

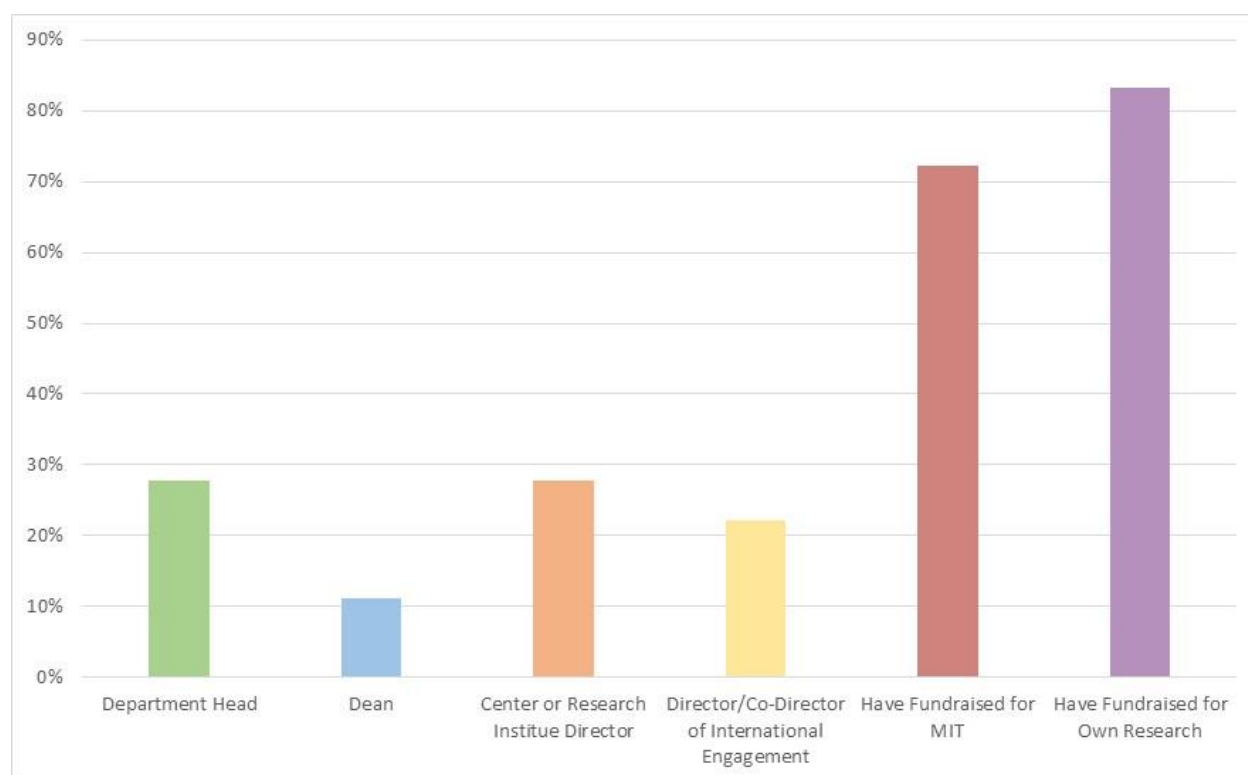
To engage students, a Student Committee on Guidelines for Outside Engagements (“Student Committee”) will be convened by the Undergraduate Association and the Graduate Student Council to advise the Committee with regard to guidelines for outside engagements. Representatives of the Student Committee will meet frequently with the chair of the Committee to provide input and receive summaries of the progress by the Committee. The Student Committee will prepare a report that will be incorporated as an appendix in the final report of the Committee.

One or more updates will be presented by the Committee at Institute Faculty Meetings to gather input prior to the completion of the final report.

9.1.2 Members of the Committee

In May 2020, we collected information from the 18 committee members via a short survey to highlight their expertise in the areas of fundraising and international engagements. As shown in **Figure 12**, many committee members had served as department heads (more than a quarter of the Committee), deans, directors of research institutes or centers at MIT (also more than a quarter of the Committee), and directors or co-directors of large international engagements like MIT Portugal.

Figure 12: Characteristics of Committee Members



As can be seen from **Figure 12**, most committee members had experience fundraising for both MIT (in their roles as department heads, deans, or center directors) as well as for their own research. These fundraising experiences have been extremely diverse, with faculty members having raised funds from a

range of different sources: governments, corporations, private donors, foundations, non-profits (both in the United States as well as outside), the World Bank, non-U.S. universities, and U.S. state or municipal governments.

9.2 APPENDIX 2: CAMPUS CONVERSATIONS

The Committee held 15 campus conversations across the community to get input on what the community thought our values and guidelines should be with respect to outside engagements. We had each campus conversation transcribed and used these transcripts to summarize what we heard in these conversations. We categorized the suggestions from the campus conversations into three categories: (i) values, (ii) red and/or yellow lights in the guidelines, and (iii) the infrastructure needed to support the guidelines and any other comments.

For the campus conversations, we aggregated the comments to each constituency (rather than by conversation) for a total of 11 constituencies: the 5 schools, students, research staff, all staff, Resource Development staff, alumni, and the open community meeting attendees. In the summaries that follow, we list the issues raised in the conversations and the number of constituencies these issues were raised in (out of the 11 total).

The summaries are as follows:

Values	Total [out of 11]
Diversity, equity, and inclusion	8
Respect, kindness, empathy, fairness, humility	7
Knowledge and the advancement of knowledge	4
Scientific integrity	4
Trustworthiness, self-criticism, honesty, integrity	4
Democracy and governance	3
Excellence	3
Learning and education	3
Truth/based in science	3
Courage and confidence to speak up	2
Embracing complexity	2
Moral consistency	2
Open-mindedness	2
Red and/or Yellow Lights	Total [out of 11]
Transparency and accountability	10
Academic freedom for all (faculty, students, staff)	9
MIT reputation	7
Breaking the law (consider nature of crime, rehabilitation)	6
Violating political, civil, human rights (use third-party sources)	6
Alignment with the MIT mission	5
Alignment with MIT values	5

Red and/or Yellow Lights	Total [out of 11]
Climate deniers, those harming the environment	5
Working on pressing problems, making the world better	5
No research on military/weapons; limit negatives of dual use	3
Careful on role of donors in project selection	2
Taking the money changes our findings	2
Values will bring in more donors	2
Clarity on conflicts of interest	1
Do not prohibit engaging with the politically unacceptable	1
Should not have taken the gift for the College of Computing	1
Supporter(s) of terrorism	1
Violating child labor laws	1

Infrastructure for the Guidelines and Other Issues	Total [out of 11]
Anonymity from donor side is fine	5
Higher bar for naming things	4
Does MIT need to be this big/growth seems a priority	3
Standing Committee	3
Clarity in the guidelines	2
Additional processes may delay things	1
Can we learn from other institutions?	1
Education on the guidelines for the whole community	1
Include testing with cases	1
More avenues and protection for whistleblowers	1
Precedents and case law	1
Public disclosure by faculty of whom they get money from	1
Restorative justice	1
Use the same guidelines for our endowment	1

9.3 APPENDIX 3: WHITE PAPERS

The Committee requested heads of departments, labs, and centers (DLCs) to convene their communities to write a two-page white paper on what our values and guidelines for outside engagements should be. The Committee received 17 white papers. Different DLCs chose to convene their communities in different ways. Some DLC heads chose to have conversations over a meeting and then drafted their white papers and circulated them among the community for comments. Some requested input by email. One even emailed a survey to its whole community. The MIT Sloan School of Management asked its DLCs to join together to produce a single white paper, so one white paper submitted by the Sloan School covers nine different DLCs working together.

The Committee summarized the white papers in the same way as we did the campus conversations, into three categories: (i) values, (ii) red and/or yellow lights in the guidelines, and (iii) the infrastructure needed

to support the guidelines and any other comments. The numbers in the summaries that follow refer to the number of white papers that mentioned the relevant item, out of a total of 17 submitted white papers.

The summaries are as follows:

Values	Total [out of 17]
Diversity/inclusion	8
Respect, compassion, trustworthiness, fairness, integrity	8
Intelligence/research excellence	5
Innovation and creativity	3
Can we uphold our positive values to have impact?	2
Culture shift away from a culture of "not listening"	1
Hard work	1
Safety – physical, emotional, and intellectual	1

Red and/or Yellow Lights	Total [out of 17]
Transparency and accountability	11
Addressing global challenges requires engaging/collaborating	9
Breaking the law	8
Academic freedom (faculty and students)	7
Violating human rights (use third-party sources)	6
Our mission (education and research)	5
MIT reputation	4
No climate change deniers, partners should be environmentally responsible	3
Clarity on conflicts of interest	2
Account for cost of stewarding the gift	1
Allow dual use of technology	1
Clarity on origins of the money	1
Do not prohibit engaging with the politically unacceptable	1
Labor rights	1
No research on weapons of war, artificial intelligence tools that target killing	1
Promote sustainability development goals	1

Infrastructure for the Guidelines and Other Issues	Total [out of 17]
Standing Committee	4
Guidelines should not be overly prescriptive or restrictive	3
Reporting mechanism, allow any community member to raise concerns	2
Dynamics/process for revoking naming rights	1
Enact and support restorative justice	1

Infrastructure for the Guidelines and Other Issues	Total [out of 17]
Explicitly acknowledge complexity of the topic, circumstances faculty face	1
Message carefully, given public perception countries matter	1
Principles and processes cannot be separated	1
Set of questions for faculty and others to refer to	1
Training around guidelines	1
Use existing Technology Licensing Office guidelines, existing practices around work for hire, open access, conflict of interest	1

9.3.1 White Paper Guidelines

The instructions given to DLC heads for the white papers were as follows:

Please note that the role of this committee is prospective, intended to define principles for such engagements moving forward and not a revisit of the past.

Below are some key components of the charge to be discussed in the white paper:

1. The first responsibility of our committee is to create a set of values consistent with our mission. We think of these as values that we hold dear to MIT that we want to uphold in all of our engagements. We would love your input into what your community thinks these values should include.
2. The second main responsibility of our committee is to create a set of guidelines from these values that can then be used to make decisions about whom we engage with. Does your community have a view on what these guidelines would be? Can your community think of cases that should inform these guidelines that may be particularly important for our committee to look at and analyze? Are there particular cases that your DLC dealt with that are good cases for analyzing these guidelines? Do you have a set of values and/or guidelines your DLC uses?
3. For international engagements, what additional guidelines would the community feel are important to consider, especially when engaging with governments, individuals, corporations, and foundations?
4. Other questions you may want to address in the white paper: how does the community feel about anonymity of grants/gifts; how does the community think about the inherent dynamic nature of these guidelines?

Page limit: 2 pages maximum (12-point font)

Due Date: February 14th [2020]

9.4 APPENDIX 4: PREVIOUS MIT REPORTS CONSULTED

“A Global Strategy for MIT,” Richard Lester, 2017

“Advancing a Respectful and Caring Community: Learning by Doing at MIT,” Ed Bertschinger, 2015

“Institute-wide Task Force on the Future of MIT Education: Final Report,” Chaired by Israel Ruiz, Sanjay Sarma and Karen Wilcox, 2014

“A Shared Responsibility: Report of the Committee on Managing Potential Conflicts of Interest in Research,” Chaired by Sheila Widnall, 2010

“In the Public Interest: Report of the Ad Hoc Faculty Committee on Access To and Disclosure of Scientific Information,” 2002

“The International Relationships of MIT in a Technologically Competitive World,” Chaired by Eugene Skolnikoff, 1991

“Report of the Ad Hoc Committee on the Military Presence at MIT,” 1986

9.5 APPENDIX 5: POLICIES FROM PEER SCHOOLS

The Committee collated all the publicly available gift policies by other universities in the United States and the United Kingdom. Twelve such policies were available, from The University of Edinburgh, Brown University, The University of Kent, Cornell University, California Institute of Technology, Columbia University, Duke University, The University of Leicester, Princeton University, Smith College, Stanford University, and The University of Cambridge. We summarized the conditions mentioned in the gift policies under three different categories: (i) the process for review, (ii) any overall criteria, and (iii) specific risk criteria to consider. The numbers in the summaries that follow refer to the number of schools that mentioned the relevant item in their gift policies, out of a total of 12.

The summaries are as follows:

Process	Total [out of 12]
Review process based on dollar amount or risk level	6
Review process based on type of donation	3
Acceptance authority lies with corporation or special committee	1
Overall Criteria	Total [out of 12]
Must support aims of university	6
Not impinge on academic freedom	5
Not damage integrity or reputation	1
Specific Risk Criteria	Total [out of 12]
Reputational costs for university (or its constituents) disproportionate to donation	8
Conditions imposed counter to university practice/objectives/are too onerous	7
Illegal activities by donor (crime, bribery, anti-terror) or funds acquired illegally	5
Accepting donation (or use of donation) would be unlawful/counter to public interest	5
Has the potential to create unacceptable conflicts of interest	4

From a source that is counter to university's public interest*	3
Activities of donor conflict with university objectives	3
May deter future support	3
From parents/guardians with a student applying to the university	2
Will cause unacceptable damage or injury to third parties	1

- * One university phrased it specifically as follows: explicit environmental damage; manufacture and sale of armaments to military regimes; institutional violations of human rights, including exploitation of the work force; discrimination in any shape or form; manufacture and sale of tobacco products.

9.6 APPENDIX 6: TOOLS

Individuals tool: https://mit.co1.qualtrics.com/jfe/form/SV_1NBMhs4PRfCCKFL

Organizations tool: https://mit.co1.qualtrics.com/jfe/form/SV_5cdulnKyibO9FXf

9.7 APPENDIX 7: RESOURCES USED BY RESOURCE DEVELOPMENT

The Office of Prospect Identification, Research, and Management currently uses the following data sources for due diligence:

- [EMIS](#): information on emerging markets/companies (cost share with MIT libraries)
- [Capital IQ](#): a platform for global market intelligence
- [iWave](#): fundraising intelligence software
- [PrivCo](#): private company research (one shared license)
- [NOZA](#): a charitable donations database
- [Relationship Science](#): information on interconnections between entities
- [DonorSearch](#): information on existing/prospective donors
- [Kaleidoscope](#): securities research, intelligence, and analytics
- [Nexis for Development Professionals](#): LexisNexis resource with information from public records
- [LinkedIn Premium](#): information on individuals, companies, organizations, and professional networks
- [Wealth-X](#): donor information
- [Ancestry.com](#): donor/family interconnections (one shared license)
- [PropertyShark](#): data on real estate properties (one shared license)
- [Foundation Directory Online](#): data on foundations (one account split with the Office of Foundation Relations and MIT Libraries)
- [Inside Philanthropy](#): online publication with news on philanthropy/donors (two shared licenses)

- [Chronicle of Philanthropy](#): magazine covering news/issues related to philanthropy (hard copy subscription)
- [Chronicle of Higher Education](#): magazine covering news/issues related to higher education (hard copy subscription)
- [The Boston Globe](#): (print and online)
- [The New York Times](#): (print and online)
- [The Wall Street Journal](#): (print and online)
- [Bloomberg](#): (three licenses)
- [Descartes Visual Compliance](#): suite of “export, trade and financial compliance solutions” (per website) (enterprise MIT license)
- [Dow Jones](#): (shared license between Office of Resource Development, Office of the Recording Secretary, Industrial Liaison Program)
- [Risk Advisory](#): firm used for enhanced due diligence, as needed

9.8 APPENDIX 8: STUDENT COMMITTEE REPORT

The following report from the Student Committee was submitted for inclusion in this report on July 9, 2020.

Student Committee on Guidelines for Outside Engagements

Interim Report

July 9, 2020

This report was instigated by events related to sexual violence and human trafficking, and therefore touches upon these events and other related potentially sensitive topics.

We also recognize that this report is being released during a time of crisis for students across many fronts, from the COVID-19 pandemic and its consequent effects, to the protests and surging movement against systemic racism, to the recent suspension of student visas for international students who will be taking all online classes in the fall. To all students who cannot dedicate adequate time and energy to the issues addressed by this report at the moment, we wish the circumstances and timing around this interim report could be better. We greatly appreciate any and all feedback you can give during this time.

Executive Summary

This interim report summarizes the findings so far of the Student Committee on Guidelines for Outside Engagements (“the Committee”), which was formed in response to news in the summer of 2019 about MIT’s relationship with Jeffrey Epstein. This interim report serves as a way to communicate the Committee’s current thoughts and learnings so far, and to get as much feedback as possible from the student body on the work it has done so far before publishing a final report. If you have feedback or questions on anything in this interim report, please fill out this [form](#).¹

The Committee hosted two student conversations on December 8 and 10, 2019, where a total of ~ 30 student attendees discussed how they believe MIT should act in a series of hypothetical situations involving outside engagements. The following is a collective list of moral values the Committee heard and recorded from the student conversations in December and our own Committee’s discussions. *This set of values is not listed in any significant order of importance.*

- Wellbeing of Students and the MIT Community, including:
 - Financial stability
 - Safety
 - Support
- Wellbeing of Society and the World, including:
 - Community responsibility
 - Human rights
 - Social justice
- Equity and Inclusion, including:
 - Community and Culture
 - Participatory decision-making
- Diversity, including:
 - Open-mindedness and respect
 - Representative decision-making

¹ URL to the feedback form: <https://forms.gle/R8jA9XkvdKCgx5Fv9>

- Moral Excellence, including:
 - Academic freedom
 - Conflicts of interest
 - Moral character and service
 - Power to dissent
- Accountability and Transparency, including:
 - Contextually-responsive values
 - Holistic consideration of values
 - Responsibility
 - Transparency in decision-making
- Academic Excellence

The Committee also identified several tradeoffs, outlined here:

- Shared values vs. Autonomy
- Bureaucracy vs. Accountability
- Morality vs. Utility
- Accountability vs. Forgiveness
- Transparency vs. Prevention of Reputation Laundering
- Transparency vs. Privacy
- Legality vs. Morality
- Fact vs. Rumor
- US vs. Foreign Interests

Students had a variety of different approaches to assessing these tradeoffs, outlined here.

These are general themes that the Committee identified; any given individual student likely uses a mix of these approaches, and others, in varying proportions.

- Moral Absolutism
- Utilitarianism
- Legalism
- Relativism
- Democratic Moralism
- Absolute Transparency

We conclude the report with the Committee's reflection on previously stated principles that guide MIT's outside engagements, which largely focus on international engagements, specifically

- Any discussion of MIT's values with respect to outside engagements should recognize the role that MIT's mission plays as a key motivation for pursuing such engagements.
- Attention should be paid to the values that our partners uphold beyond the scope of their partnership with MIT and how they may be in conflict with our own.

- MIT should make decisions that are best for MIT and most aligned with our values, even if this does not always align with the interests of outside entities.
- Unlike faculty, students do not always have the power to make decisions about outside engagements for themselves, but may still be harmed by the consequences of those decisions. Therefore, an MIT-wide set of principles for engagement would be helpful in protecting students from the harm that can be caused by the current system.

The Committee is interested in hearing your feedback² so that we can articulate an all encompassing set of guidelines for outside engagements that represents the student body in the final report.

² URL to the feedback form: <https://forms.gle/R8jA9XkvdKCgx5Fv9>

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1. Introduction

In the summer of 2019, news of MIT's relationship with Jeffrey Epstein exposed MIT's lack of strong values, guidelines, and processes that govern MIT's involvement with outside engagements. To help understand those values and recommend appropriate guidelines, the MIT Faculty created the Ad Hoc Faculty Committee on Guidelines for Outside Engagements ("the Faculty Committee"), which was announced to all faculty on October 11, 2019. To ensure adequate student input on such an important topic, the Graduate Student Council (GSC) and Undergraduate Association (UA) agreed with the Chair of the Faculty to form a Student Committee on Guidelines for Outside Engagements ("the Committee"), which would write a report that would be appended to the report from the Faculty Committee. The full charge for the Committee is included in this report's appendix. Applications for membership on the Committee opened on October 29, 2019. Applications were open to all students and the selection process for both the graduate and undergraduate members involved elections by their respective student bodies. The membership of the Committee was finalized on November 13, 2019. The selection processes used by the GSC and UA and the membership of the Committee are also included in the appendix.

This interim report documents what the Committee has learned so far. The Committee hosted two student conversations on December 8 and 10, 2019, where a total of ~30 student attendees discussed how they believe MIT should act in a series of hypothetical situations involving outside engagements. The discussions from these conversations informed the deliberations of the Committee. The Committee met 10 times in total as a whole committee, with meetings originally scheduled approximately once every 2 weeks until COVID-19 forced the Committee to pause for more than a month. The Committee also referenced the transcript of the UA/GSC MIT & Jeffrey Epstein Student Forum in October 2019 for additional input on student values with regards to outside engagements.

The Committee takes its task of representing the student body seriously and understands that it is working with a limited amount of direct student feedback. As such, the Committee is releasing this interim report to communicate the Committee's current thoughts and learnings so far, and to get as much feedback as possible from the student body on the work it has done so far. If you have feedback or questions on anything in this interim report, please fill out this [form](https://forms.gle/R8jA9XkvdKCgx5Fv9).³

The basic outline of this interim report is as follows: We first provide some context that the reader may find useful. Then, we outline the various values that we heard expressed by students, including those on the Committee. Then, we will highlight some of the tradeoffs that these values suggest, and we will outline the various approaches that we saw students take towards addressing those tradeoffs. Finally, we will take a look at the existing guidelines for outside engagements.

³ URL to the feedback form: <https://forms.gle/R8jA9XkvdKCgx5Fv9>

2. Context

Types of Outside Engagements

Outside entities can be individuals or organizations such as companies, non-profits, or governments. MIT's level of engagement can range from individual students, staff, or faculty to student groups, departments, schools, or to an Institute-wide initiative. Engagements between MIT and outside entities can occur formally or informally in various settings. The following is a descriptive but not exhaustive list of outside engagements.

- Donations (e.g. endowment fundraising)
- Research funding
- Research partnerships
- Exchange programs
- Job recruitment
- University collaborations e.g. SUTD, Skoltech
- Sponsored events e.g. hackathons, corporate seminars
- Invited guests including speakers either informally and formally
- MIT's Industrial Liaison Program
- MIT's Washington Office

MIT's Finances

A high level picture of MIT's finances and the role that outside engagements, particularly fundraising, plays in them has already been well outlined by the Faculty Committee in their draft report⁴ and by the Ad Hoc Committee to Review MIT Gift Processes in their interim report.⁵ Therefore, we encourage anyone who is interested in this context to read the relevant sections of those reports (see footnotes for links).

3. Values

The following is a collective list of moral values the Committee heard and recorded from the student conversations in December and our own Committee's discussions. Although we use the all-encompassing term "students," we acknowledge that not *all* students may share these values, but that a significant number of students do. *Notably, this set of values is not listed in any significant order of importance.*

⁴ The draft report of the Faculty Committee should be linked from this page:
<https://facultygovernance.mit.edu/committee/ad-hoc-faculty-committee-guidelines-outside-engagements>

⁵ The interim report of the Ad Hoc Committee to Review MIT Gift Processes can be found here:
https://facultygovernance.mit.edu/sites/default/files/2020-02_ProcessesCommitteeInterimReportFinal.pdf

Wellbeing of Students and the MIT Community

Students deeply care for the wellbeing of their fellow students and the broader MIT community. This sense of wellbeing is multifaceted, but in particular, students highlighted:

- *Financial stability:* Students desire financial security, both now and in their future semesters at MIT, through financial aid packages, fellowship grants, research and teaching positions. They also desire that their peers who require financial support are able to receive it.
- *Safety:* Students expect that MIT protects and supports the physical and mental safety of their fellow MIT community members above all.
- *Support:* Students expect that MIT supports marginalized communities on campus through proper resources, including improved mental health, counseling services, and mentorship programs. This includes that MIT understands the way that its engagements with actors can disproportionately harm marginalized communities, including through mental health effects on students who may morally disagree with the engagement.

Wellbeing of Society and the World

Students recognize that MIT has powerful influence in the world, from the direct impact of its research and educational mission, to the values that MIT stands for and amplifies with its highly visible brand. Students desire that MIT not only communicates its desire to do good for the world through its words, but also through its actions. Students highlighted these particular aspects of societal wellbeing:

- *Community responsibility:* Students feel that MIT holds a responsibility to the higher education community and academia in general, and should be at the forefront in pulling other institutions towards building a better higher education system. Students also feel that MIT has a responsibility towards bettering the local community around MIT, in addition to the broader world at large.
- *Human rights:* Students expect that basic human rights are respected by everyone who engages with MIT. More so, students desire that MIT actively devote more to combat issues that harm the safety and rights of people all over the world, including human trafficking, and sexual assault and harassment.
- *Social justice:* Students recognize the glaring inequities that exist in the world and express a strong desire to both individually and collectively recognize and redress them, and to support and empower the marginalized people affected by them.

Equity and Inclusion

Although equity and inclusion are highly intertwined with the previous two values on wellbeing, we highlight them as their own category because these values were overwhelmingly prevalent in every forum of student feedback. Students believe that people of marginalized communities

should not only be included and listened to, but that they should be actively reshaping, benefiting from, and comprising the various systems at MIT. Notably, students feel that the incidents of the past few years are symptomatic of wider cultural issues, and require serious, Institute-wide examinations of culture and conduct. In addition to wellbeing of students and the MIT community, and wellbeing of society and the world, we highlight underlying aspects:

- *Community and Culture*: Students treasure the various communities that transform their experience and self at MIT, including the student community at-large. These communities form the bedrock of MIT's unique culture and often provide students from marginalized backgrounds a place to call home.
- *Participatory decision-making*: Students believe that MIT community members should be actively engaged throughout the decision-making process. It is also equivalently important for this feedback to be acknowledged and appropriately incorporated into the decision itself.

Diversity

Students respect and appreciate the diversity of thought, background, experience, and interests at MIT, and desire far more cognitive and experiential diversity at all levels and parts of MIT.

- *Open-mindedness and respect*: Students desire an open-mindedness from all to listen to different viewpoints and to thoughtfully and respectfully engage in difficult conversations.
- *Representative decision-making*: Students believe that since moral decisions are made on behalf of the entire community, *all* of its constituents deserve to be represented in the body making final decisions.

Moral Excellence

Students value truth, honesty, and integrity, both in words and actions. They expect that *all* community members, including senior leadership and tenured faculty members, are held to the same standards and underlying values agreed upon in MIT's conduct and community policies.

- *Academic freedom*: Students believe in the academic freedom to research, teach, and communicate ideas within the boundaries of responsible, nondiscriminatory, and ethical conduct.
- *Conflicts of interest*: Students ask that MIT not only consider monetary sources of conflict of interest, but also other types of conflicts of interest that harm the welfare of MIT community members and/or the academic research conducted by MIT community members.
- *Moral character and service*: Students feel that MIT has not sufficiently valued and/or incentivized excellence in moral character and service in decisions about fundraising, collaborations, hiring and faculty tenure.

- *Power to dissent:* Students feel that all MIT community members must feel able and confident in expressing their disagreement with institutional ethics and practices. This is closely related with the safety value under wellbeing of students and the MIT community.

Accountability and Transparency

Students expect that accountability and transparency are appropriately integrated in every facet of MIT's conduct. This includes:

- *Contextually-responsive values:* Since values and processes change over time, the mechanism to understand and incorporate values must be updated to make sure current values are being considered.
- *Holistic consideration of values:* Students desire that MIT consider all of its values, even if the values are in conflict, to arrive at every decision, so as to not cherry-pick certain values and ignore others to rationalize different decisions.
- *Responsibility:* Students respect when leadership and community members take ownership and responsibility, and in particular share genuine apologies for problematic actions. Students also believe, though, that actions speak louder than words.
- *Transparency in decision-making:* When Institute decisions are announced, they should be coupled with an explanation for the choice and the process, including a description of the information collected, used to arrive at said choice.

Academic Excellence

Students strongly value continued excellence in MIT's academic output, in both teaching and research. This includes innovative progress, high quality research, intellectual curiosity, critical analysis, and self-reflection.

4. Tradeoffs

In addition to the values outlined in the previous section, the Committee identified several tradeoffs to capture the complexity of questions asked, which are summarized below. These kinds of tradeoffs can be complex and difficult, and given that there rarely is one universal answer, there are different approaches used by students in thinking through these questions. We outline those approaches in the next section.

Shared values vs. Autonomy

MIT should articulate its community values. Considering that there may be multiple valid approaches to an issue, at what threshold does a value encompass enough community

members' individual values to be labeled a "shared" value? How do you balance a commitment to shared values with the autonomy of community members?⁶

Bureaucracy vs. Accountability

MIT should perform due diligence review of proposed engagements. Given that it takes time to thoroughly review proposed engagements, which may invariably slow down the rate of progress, what threshold must be met for proposed engagements to necessitate more extensive review beyond the basic requirements?

Morality vs. Utility

Can the potential utility of an engagement to MIT and MIT's mission override concerns about the entity? Do the ends ever justify the means? Should the decision to engage with a contentious entity change based on how much value they can provide to MIT's mission?

Accountability vs. Forgiveness

Does MIT's acceptance of resources from a morally controversial entity imply forgiveness, redemption, or trivialization of the entity's actions? If there is an aspect of forgiveness or redemption, how can MIT still maintain accountability?

Transparency vs. Prevention of Reputation Laundering

MIT can increase transparency in its financial engagements by reducing the number of anonymous gifts and by increasing the community's and public's understanding of MIT's engagements and finances. How can MIT increase transparency to produce accountability while preventing outside entities from using their affiliation to launder their reputation? Is selectively restricting transparency to reduce reputation laundering acceptable?

Transparency vs. Privacy

For financial engagements, in particular donations, some say that there should be no anonymity. They argue that transparency should be applied without exception to make engagements with ill-intentioned entities untenable. Others say that people donate out of goodwill and do not want to attract attention to themselves for personal or religious reasons. How does one balance transparency with respect for privacy?

⁶ As one contextual point, the Lester report on MIT's relationship to Saudi Arabia says the faculty's right to "pursue their intellectual interests and objectives without interference is among the most fundamental operating principles of our Institute" although it "is not an unalloyed right."

Legality vs. Morality

An entity may have committed an action that was legal but viewed to be immoral or unethical, or conversely illegal but viewed to be moral or ethical. How should MIT evaluate the circumstances and decide whether to engage? Should the decision be affected if the action was once legal or illegal but is now considered otherwise? In another instance, an entity may have committed an action that is (or was) legal in their jurisdiction but is illegal according to United States law. How should MIT apply differing legal and moral frameworks?

Fact vs. Rumor

If the external entity has a rumored but unconfirmed immoral history but their intentions seem honest, how should MIT proceed? At what point does a rumor become credible?

US vs. Foreign Interests

MIT is located in the United States, with strong ties to American institutions and the United States government. MIT is also an international community, composed of members from across the world and engaging in many international collaborations. How should MIT balance national and international interests? If the US government requests but does not order MIT to cancel a foreign engagement, on what basis should MIT accept or deny the request? If there are disputes between a domestic company and a foreign one, especially in sectors with competing national industrial policies, how should MIT manage its engagements with both? In a similar scenario, if an attractive engagement with foreign country A is predicated on severing engagements (exclusive of student admissions) with foreign country B and the US government's position is neutral, how should MIT proceed? How differently should MIT evaluate foreign companies and governments? At what point does a foreign company become too close to a foreign government to be treated separately?

5. Student Approaches to Tradeoffs

MIT possesses a diverse student body. Accordingly, it should be of little surprise that there is large variation in students' approaches to the issue of outside engagements and the above tradeoffs. The Committee identified the following lenses through which students assessed the tradeoffs. These are just general themes that we identified; any given individual student likely uses a mix of these lenses, and others not identified below, in varying proportions.

Moral Absolutism

Its proponents believe that MIT should follow a fixed set of moral values and apply them to outside entities and engagements with no exceptions. Therefore, MIT should use its reputation and reach to find enough moral outside entities and engagements to achieve its mission. Anything less is unacceptable.

Utilitarianism

Its proponents consider the acceptability of outside engagements as highly contingent on the situation at hand, and attempt to practically assess the tradeoffs with each situation. This categorization necessarily groups people with different values, but the common factor is that some form of tradeoff analysis is an acceptable means to decide on which engagements to accept.

Legalism

Its proponents believe MIT should rely on the legal system rather than trying to replace it with MIT's own moral judgements. Therefore, engagements are acceptable if they are legal and the outside entities have been engaged only in legal activities.

Relativism

Its proponents believe that everyone has their own value systems and that MIT shouldn't be enforcing any one value system over another. Therefore, MIT should accept all engagements, but allow MIT community members to opt out of association with those engagements without any negative consequences (which means they have the same opportunity the engagement would have provided).

Democratic Moralism

Its proponents believe that MIT should use a democratic system to draw the line on which engagements to accept or not accept, whether the result agrees with their personal beliefs or not. The system could be direct or proportionally representational, but in all cases, the majority of the voting body rules.

Absolute Transparency

Its proponents believe that as long as MIT is completely transparent with what engagements it is accepting and why, the response from the MIT community and the rest of the world to what MIT does will guide MIT's behavior in a positive direction.

6. Reflecting on Existing Guidelines for Outside Engagements

With such a highly diverse student body and limited direct feedback from students, the Committee found it difficult to articulate an all encompassing set of guidelines for outside engagements in this interim report that represents the student body. We look forward to student feedback to develop recommendations in the final report.⁷

⁷ Same as above, URL to the feedback form: <https://forms.gle/R8jA9XkvdKCgx5Fv9>

Rather than articulate a completely new set of guidelines with limited student input, this section is intended to reflect on previously stated principles that guide MIT's outside engagements. In drafting this section, the Committee consulted previously published reports on MIT's engagements, which largely focus on international engagements, and chose to reflect on key principles demonstrated across reports.

MIT's Mission

"The mission of MIT is to advance knowledge and educate students in science, technology, and other areas of scholarship that will best serve the nation and the world in the 21st century.

The Institute is committed to generating, disseminating and preserving knowledge, and to working with others to bring this knowledge to bear on the world's great challenges. MIT is dedicated to providing its students with an education that combines rigorous academic study and the excitement of discovery with the support and intellectual stimulation of a diverse campus community.

*We seek to develop in each member of the MIT community the ability and passion for working wisely, creatively, and effectively for the betterment of humankind."*⁸

The MIT mission statement is referenced in a number of reports on MIT's guidelines and strategies for outside engagements. A consistent message across reports is that any activities which MIT chooses to participate in should be consistent with MIT's mission statement. Additionally, many reports make the argument that MIT cannot act in a way that is in line with its mission without engaging with outside entities. Any discussion of MIT's values with respect to outside engagements should recognize the role that MIT's mission plays as a key motivation for pursuing such engagements.

Core Values

A list of core values established in *A Global Strategy for MIT* includes the following:

1. Dedication to advancing the frontiers of what is known
2. Encouragement of discovery, intellectual risk-taking, and creative problem-solving
3. Honesty and integrity in all academic and personal dealings
4. Respect for others
5. Fairness in the treatment of all individuals and groups
6. An open, respectful approach to discourse
7. Reliance on fact- and reason-based objective inquiry
8. Freedom of expression, communication, publication, and movement of people; and
9. A commitment to excellence in all that we do

⁸ <https://web.mit.edu/facts/mission.html>

The principles listed above are meant to guide the actions of MIT community members in their work with outside entities. However, students do not necessarily agree that it should be considered sufficient for our partners to uphold these values within the confines of their partnership with MIT. While MIT should consider cultural and social differences when evaluating the actions of new partners, attention should also be paid to the values that our partners uphold beyond the scope of their partnership with MIT and how they may be in conflict with our own.

MIT's Responsibility to Stakeholders in Cases of Unaligned Values or Interests

Previous guidelines have always emphasized that MIT should make decisions that are best for MIT and most aligned with our values, even if this does not always align with the interests of outside entities. This applies in particular to the US government. As an American institution, members of the MIT community are expected to act in accordance with relevant federal and state laws and regulations. In considering new engagements, MIT is cognizant of national interests and policies, and in cases where there are direct conflicts between the interest of the US and other countries, US interests are put before the interests of any other country. However, as explained in MIT's Relationship to China, "When our plans and programs are not aligned with those policies, we have a responsibility to be fully transparent, to inform relevant agencies so there are no surprises, and to engage with government officials in discussions of these differences."⁹

The relationship between MIT and the US government is a very different one from MIT's relationship with its students. However, students similarly represent a group whose values should be considered in evaluating international engagements. These principles of transparency and communication may be useful in developing a process through which students are engaged in discussion around decisions that do not agree with their values.

Autonomy of Faculty

Many engagements are driven from a 'bottom-up' model in which faculty members and departments pursue partnerships that align with their research goals. Typically engagements are not as driven by top down guidance from senior administration.

Support for the autonomy of faculty came up in a number of reports. This takes the form of two major arguments.

1. Engagements should be faculty driven. This means both that MIT should not pursue an engagement if there are no faculty members interested in and dedicated to the project. Conversely, as mentioned in the 2019 Lester report, MIT should not terminate projects where there are faculty members willing to continue these relationships.

⁹ Richard Lester, MIT's Relationship to China (MIT Faculty Newsletter Sep/Oct 2018)

2. As stated in MIT's Greater China Strategy, "Our faculty are and must remain free to follow their intellectual agendas and moral predispositions. That is the Institute's most fundamental operating principle."¹⁰ MIT faculty members should be free to pursue or reject engagements based on their own moral judgements. This raises the question, in developing guidelines for MIT's outside engagements, should it be the role of the MIT senior administration to establish principles based on morality if they are not consistent with the views of all members of the faculty, or should MIT refrain from making statements in these matters and defer to the faculty to make these judgements and speak out as they see appropriate?

This is not a simple question to answer and as such should be treated with great care. There may be some situations in which it is appropriate for MIT to articulate a stance on a particular subject, and others where it may not be. However, it is important to consider that any member of the MIT community who chooses to engage with outside entities does so as a representative of MIT.

The student body is not a monolith, and many students have expressed differing opinions on what engagements they would accept or reject. However, unlike faculty, students do not always have the power to make those decisions for themselves, but may still be harmed by the consequences of those decisions. Therefore, an MIT-wide set of principles for engagement would be helpful in protecting students from the harm that can be caused by the current system.

Reports and Articles Consulted:

- Richard Lester, Review and Reassessment of MIT's Relationships with the Kingdom of Saudi Arabia: a Report to President L. Rafael Reif (2019)
- Richard Lester, A Global Strategy for MIT (2017)
- L. Rafael Reif, MIT's Approach to International Engagement (MIT Faculty Newsletter Jan/Feb 2011)
- Richard Lester, MIT's Relationship to China (MIT Faculty Newsletter Sep/Oct 2018)
- MIT International Advisory Committee (IAC), Guiding Strategies for MIT's International Activities (2009)
- MIT Greater China Strategy Working Group & Office of Global Initiatives, the MIT-Greater China Strategy (2010)

¹⁰ MIT Greater China Strategy Working Group & Office of Global Initiatives, the MIT-Greater China Strategy (2010)

7. Appendices

A. All Committee Members (Past and Present)

Undergraduates

Mahalaxmi Elango (Co-chair)
Bryan Padilla
Darya Guettler
Maximillian Lagenkamp
Sarah Edwards
Amelia Dogan**

Graduate students

Peter Su (Co-chair)
Amauche Emenari
Seiji Engelkemier
Aiyah Josiah-Faeduwor*
Bridget Burns**†
Michael Smithers**
Vanessa Conzon**

* These students resigned from the Committee in January 2020 and were not involved in writing this report.

** These students resigned from the Committee in June 2020 and were not involved in writing this report.

† These students joined the Committee in January 2020.

B. Charge for the Committee

The charge of this committee is similar to that of the Ad Hoc Faculty Committee on Guidelines (FCoG) for Outside Engagements. Specifically, the charge is to define a set of values and principles, consistent with MIT's mission, to guide the assessment of outside engagements. Outside engagements include grants, gifts, and any other associations and collaborations involving MIT with governments, corporations, foundations, or private individuals, domestic or foreign. Additionally, if time allows and the committee feels it has the necessary information, the committee may review MIT's gift processes. The committee will produce a report to be included with the set of guidelines produced by the FCoG, with which it will work closely, to be employed by the MIT decision-makers in ways that will be defined by the Ad Hoc Committee to Review MIT Gift Processes for the evaluation of potential outside engagements.

The Student Committee on Guidelines for Outside Engagements will have twelve members: six undergraduate students to be convened by the Undergraduate Association (UA) and six

graduate students by the Graduate Student Council (GSC). The Student Committee will be co-chaired by Mahi Elango, President of the UA and Peter Su, President of the GSC. The Student Committee co-chairs will also be members of the Ad Hoc Committee to Review MIT Gift Processes, to help facilitate conversation between both committees.

The report of the Student Committee will include the following components and will be included alongside the report of the Faculty Committee:

- A discussion of MIT core values that are the basis for evaluating all engagements, particularly problematic ones.
- Guidelines for use by MIT individual faculty, administration, and relevant staff and committees in determining whether proposed engagements with governments, corporations, foundations, or private individuals are acceptable.
- The report will also discuss general principles relevant to evaluating and undertaking outside engagements, such as under what conditions, if any, anonymous donations can be considered.
- The report will also propose mechanisms for reviewing the status of implementation of these guidelines.
- To inform their deliberations throughout the year, the Committee will gather input from the MIT student body and other community members as well as drawing from existing expertise around these issues.

The Committee will issue its report to the MIT community during Spring 2020, alongside a community-wide discussion of the report and further actions.

C. Selection Process for the Committee

Selection Process used by the Graduate Student Council

The selection process for the graduate student members of the Committee was as follows:

1. Applications from interested students were due on Saturday, Nov 2nd @ 8:00 PM.
2. From Saturday, Nov 2nd - Tuesday, Nov 5th @ 3:00 PM, an election occurred where all grad students were eligible to vote to downselect to a final pool of ~10 candidates. The downselection process was as follows:
 - All grad students were able to vote for up to 10 candidates.
 - The top 10 candidates were included in the final pool.
 - To ensure all schools were represented, the top 2 candidates from each school were included in the final pool.
 - To ensure that low turnout does not skew the results too much towards the opinions of an unrepresentative minority, the opinions of the GSC Nominations Board (which is tasked with selecting all students to Faculty and Institute committees and therefore thinks about this type of selection all the time) were included via the following formula:

$$\text{vote\%} = (1 - 3*\text{turnout})*\text{nom\%} + (3*\text{turnout})*\text{election\%}$$

Where,

- *turnout* was the fraction of eligible grad students who voted. Anything above 1/3 was treated as 1/3 for the formula. This means that if at least 1/3 of grad students voted, the opinions of the GSC Nominations Board would not matter.
 - *nom%* was the percentage of the nominations board that voted for the candidate.
 - *election%* was the percentage of those who voted that voted for the candidate.
3. The GSC Nominations Board then selected a proposed final slate of 5 candidates, balancing election results with the need for diversity of viewpoints and backgrounds.
 4. The proposed slate was then presented to the GSC General Council for feedback on Wednesday, Nov 6th @ ~6:30 PM. This meeting was open to all interested grad students and the meeting minutes were posted on the GSC website.
 5. With that feedback, final selections by the GSC Nominations Board were announced on Tuesday, Nov 12th.

Selection Process used by the Undergraduate Association

The selection process for the undergraduate student members of the Committee was as follows:

1. An open call for membership via online application: Tues Oct 29th - Sat Nov 2nd.
2. Interview process by the UA, through which ten candidates were selected: Sat Nov 2nd - Sun Nov 3rd.
3. Elections, through which the ten candidates were publicly ranked: Mon Nov 4th - Fri Nov 8th.
 - a. All current undergraduates were eligible to vote in elections and were provided each candidate's platform.
 - b. Voters selected their (up to) top five candidates.
 - c. Candidates were ranked in terms of number of votes earned.
4. Slating by the UA, through which the final five candidates were nominated: Sat Nov 9th - Mon Nov 11th.
 - a. To ensure a balance in the diversity of School, class year, gender, race, and perspective alongside the GSC candidates, the UA chose five representatives from the top ranked candidates
5. Approval by UA Council: presented Mon Nov 11th, met on Wed Nov 13th.
 - a. Approval by UA Council followed a similar process to creating ad hoc committees and nominations for Institute committees, outlined in the UA Constitution, Article IV, Section A: The UA Officers will present Council with election results and a slate of nominees, with a rationale for the slate. The slate is effective by approval of a 2/3 vote of the full voting membership of the Council.

- b. Voting members of UA Council include the presidents of all dormitories, four IFC representatives, and three Panhel representatives.
 - c. UA Council meeting was open to all undergraduates to attend. Meeting minutes can also be found on the UA website.
6. Final selections were announced to all undergraduates on Tuesday, Nov 19th.

D. Soliciting Student Input

Prior to the organization of this committee, the UA and GSC held a joint forum to provide a centralized space for students to voice their frustrations, comments, questions, and more, in front of student, faculty, and senior leaders. The UA and GSC subsequently organized this committee, in partnership with faculty governance, to provide student perspectives on MIT's outside engagements.

In December 2019, the Committee held two student conversations, in parallel with various conversations organized by the Faculty Committee across the Schools, to inform our report. These conversations were roundtable discussions, where students were given several vignettes describing potential outside engagement situations and asked to discuss them with other students randomly assigned to their table and a group moderator (individuals from our committee). After a discussion of each vignette, participants were then asked to fill out a Google form with their decision on whether or not to accept the discussed engagement (the possible options were: yes, no, depends but leans yes, depends but leans no), a brief explanation as to why they answered this way, and what (if any) values they employed to arrive at that decision. Students were also asked to randomly reorganize into new roundtables every few vignettes to provide new discussion partners. In total, we received approximately fifty responses between the two nights of conversations. Since parsing the responses thoroughly and systematically into values for the report took our full committee over a month, we believed it would be untenable for us to ask similar open-ended questions to the entire student body, given our restricted timeline.

Some members of the Committee felt that the roughly 50 responses from the student conversations was not sufficient information to write a report representing the values of more than 11,000 students. Thus, the intent of the survey was to obtain feedback from a greater number of students in a way in which the responses could be analyzed and contextualized quickly enough to inform our interim report.

Conjoint Analysis Survey

The form of conjoint analysis used in our survey was a combination of choice-based and rating-based conjoint analysis. In choice-based conjoint, respondents are given two or more profiles and are asked to choose which one they prefer. In rating-based conjoint, respondents are asked to rate the profiles on a numerical scale to indicate their degree of preference for a particular profile (Hainmueller 2014). The profiles consist of a list of attributes, where the value of each attribute for each profile is randomly generated from a given list. An example has been

added below illustrating survey questions and a corresponding list of values and attributes from a 2014 paper by Jens Hainmueller et. al.

While conjoint analysis is traditionally used in marketing research, it has in recent years become more widely used as a technique for political science research as well, including in surveys on preferences for presidential candidates and potential immigrants to a country. We felt, given the contexts in which it had been applied in the research we consulted, it would be an appropriate approach for our survey. In drafting the survey, we reached out to two graduate students experienced with using conjoint analysis in their research for feedback on our survey approach, and the specific values we had drafted. We also solicited feedback from faculty members, Institutional Research, Committee on the Use of Humans as Experimental Subjects, and other current students before the survey was released.

Implementation of Conjoint in Our Survey

The responses we received from the conversations also left us with a number of questions regarding how students weighed various aspects of a donation to decide whether or not to accept an engagement.

Example of how some of the questions we had influenced the attributes incorporated into our survey:

1. Donor's intended use for the money
 - a. When choosing whether or not to engage with a particular donor, does it matter how the money is used?
 - b. Do students feel differently about whether or not to accept the money if it is something that directly benefits students?
 - c. Does it matter where the money came from if it is being used for a good/valuable cause?
2. Donor's Potentially Controversial Activities & Donor's Criminal History
 - a. How do students make decisions on matters of morality?
 - b. Should the law be the deciding factor on what is acceptable and what isn't?
 - c. Is it MIT's job to decide what is considered an 'acceptable' crime v. an 'unacceptable' crime?
 - d. How much weight should be given to people who have shown regret for their actions or otherwise become a better person?
3. MIT's Recognition of Donor
 - a. Are anonymous donations acceptable? (On one hand, it prevents donors from benefiting from their association with MIT, on the other, it obscures MIT's relationships with individuals that may be harmful to community members)
 - b. Do different levels of interaction change the amount of harm done in accepting a donation (ex. Does naming a building after an unfavorable donor have the same impact as that donor visiting campus)?
4. Donation Amount

- a. Does the amount of money influence how people make decisions about donors?
Is there a point at which the harm done by an individual is outweighed by the good generated through the donation?

We recognize that for some people the decisions on whether or not to accept an engagement are very clear cut, and that having the Committee consider these open questions, particularly with respect to morally reprehensible donors, can feel insulting or offensive. These questions came from processing the responses from the student conversations and the apparent disagreements among students on how to answer them. We would not be asking these questions if we were confident that there was a broad consensus among students on how to handle them. Similar to how a number of students believe that MIT should unequivocally not accept money from donors with morally reprehensible pasts, there are other students who believe that the source of the money doesn't matter as long as we use it for good, which includes fulfilling MIT's research and educational mission. We sought to understand both more about the various views students hold, and how many students hold each view.

The survey is not a perfect method for capturing student opinions on these values, and we never assumed that it would function on its own as a sufficient reflection of student values. Conjoint analysis lacks the nuance of the vignette-based conversations or in-depth conversations about donor selection or principles for the engagement process. We take our roles as student representatives seriously and would never present the data to anyone in a way that would be harmful to the student body or fail to appropriately reflect its values. If, in analyzing the data, we felt that there were errors in the survey's design which prevented us from using the data (in addition to other student feedback) to make accurate statements about student values, we would not attempt to incorporate its results into the report.

Future of the Survey

The survey results were not used to inform the Committee's interim report. We thank everyone who devoted time to think about these critical questions by answering the survey and/or provided criticism about the survey. The Committee's interim report only includes information gathered through research done by the Committee and the responses from the fall conversations.

Works Consulted

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A conjoint survey example from Hainmueller 2014.

FIGURE 1 Experimental Design

Please read the descriptions of the potential immigrants carefully. Then, please indicate which of the two immigrants you would personally prefer to see admitted to the United States.

	Immigrant 1	Immigrant 2
Prior Trips to the U.S.	Entered the U.S. once before on a tourist visa	Entered the U.S. once before on a tourist visa
Reason for Application	Reunite with family members already in U.S.	Reunite with family members already in U.S.
Country of Origin	Mexico	Iraq
Language Skills	During admission interview, this applicant spoke fluent English	During admission interview, this applicant spoke fluent English
Profession	Child care provider	Teacher
Job Experience	One to two years of job training and experience	Three to five years of job training and experience
Employment Plans	Does not have a contract with a U.S. employer but has done job interviews	Will look for work after arriving in the U.S.
Education Level	Equivalent to completing two years of college in the U.S.	Equivalent to completing a college degree in the U.S.
Gender	Female	Male

Immigrant 1 Immigrant 2

If you had to choose between them, which of these two immigrants should be given priority to come to the United States to live?

☐
☐

On a scale from 1 to 7, where 1 indicates that the United States should absolutely not admit the immigrant and 7 indicates that the United States should definitely admit the immigrant, how would you rate Immigrant 1?

Absolutely Not Admit
Definitely Admit

1
2
3
4
5
6
7

☐
☐
☐
☐
☐
☐
☐

Using the same scale, how would you rate Immigrant 2?

Absolutely Not Admit
Definitely Admit

1
2
3
4
5
6
7

☐
☐
☐
☐
☐
☐
☐

Note: This figure illustrates the experimental design for the conjoint experiment.

TABLE 1 Attributes for Immigrant Profiles in Conjoint Experiment

Attributes	Values
Education Level	No formal education Equivalent to completing fourth grade in the U.S. Equivalent to completing eighth grade in the U.S. Equivalent to completing high school in the U.S. Equivalent to completing two years at college in the U.S. Equivalent to completing a college degree in the U.S. Equivalent to completing a graduate degree in the U.S.
Gender	Female Male
Country of Origin	Germany France Mexico Philippines Poland India China Sudan Somalia Iraq
Language	During admission interview, this applicant spoke fluent English During admission interview, this applicant spoke broken English During admission interview, this applicant tried to speak English but was unable During admission interview, this applicant spoke through an interpreter
Reason for Application	Reunite with family members already in U.S. Seek better job in U.S. Escape political/religious persecution
Profession	Gardener Waiter Nurse Teacher Child care provider Janitor Construction worker Financial analyst Research scientist Doctor Computer programmer
Job Experience	No job training or prior experience One to two years Three to five years More than five years
Employment Plans	Has a contract with a U.S. employer Does not have a contract with a U.S. employer, but has done job interviews Will look for work after arriving in the U.S. Has no plans to look for work at this time
Prior Trips to the U.S.	Never been to the U.S. Entered the U.S. once before on a tourist visa Entered the U.S. once before without legal authorization Has visited the U.S. many times before on tourist visas Spent six months with family members in the U.S.

Note: This table shows the attributes and attribute values that are used to generate the immigrant profiles for the conjoint experiment.