

# PAYING FOR A WORLD CLASS AFFILIATION:

Reputation Laundering  
in the University Sector  
of Open Societies

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## EXECUTIVE SUMMARY

**M**odern kleptocracy thrives on the ability of kleptocrats and their associates to use their ill-gotten gains in open settings. This often takes the form of investing in high-end real estate or other luxury goods, which serves to both obscure the corrupt origin of the money and to protect it for future use. But there is also a subtler dynamic at play. The use of kleptocratic-linked funding or other forms of engagement in open societies to blur the illicit nature and source of the donation serves to launder kleptocrats' reputations, as well as their cash. This careful cultivation of positive publicity and influence empowers autocrats and their cronies. It also entrenches kleptocrats—and the regimes with which they are associated—in positions of power.

Universities and think tanks in open settings are prime targets for reputation laundering. The rapid internationalization of the higher education sector, as well as the swelling demand worldwide for Western education makes academic institutions particularly vulnerable to this form of transnational kleptocratic activity. Indeed, over recent years, there has been a major surge of foreign funding to U.S. and U.K. universities. The composition of fundraising has also changed. Major gifts comprise a growing share of donations, and a relatively small number of wealthy individuals contribute nearly 80 percent of gift-giving to universities.

These challenges also affect other open countries where foreign gifts traditionally have not been a major source of funding but are now actively being offered and sought. Countries like the Czech Republic and Germany have witnessed high-profile scandals involving funding from PRC-connected sources, both in exerting influence through opaque payments to faculty or through the application of Chinese law to donor agreements with the university. Such examples highlight the transnational nature of this challenge.

Key mechanisms by which individuals can launder their reputations in the higher education sector include:

- Endowing university programs and institutes as private citizens to garner legal standing and support in their country of operation, or to influence the academic remit of certain institutions;
- Serving as guest speakers or lecturers at high-profile events, thereby having a platform from which they can garner positive publicity and present themselves as influential philanthropists and leaders;
- Gaining preferential admission to academic institutions for themselves, their family, and associates, conferring prestige to the donor and creating new networks for overseas employment, association, and residence.

The risks of kleptocratic funding to U.S. and U.K. universities is taking place at a time when several high-profile scandals have forced universities to consider their own reputational risks of accepting donations from individuals with unsavory pasts. These scandals, alongside the rise in importance and influence of social media has promoted positive change. Universities are increasingly aware of the need to keep their reputation beyond reproach and have adopted ethical principles and expanded review procedures in response to increased media scrutiny.

Despite the rising awareness of the dangers posed from accepting donations of questionable provenance, universities in the U.S. and U.K. face several challenges in curbing this trend:

- Determining whether funds have illicit origins often is not straightforward. Money is often laundered so the precise source is obscured. Individuals acting in alliance with kleptocrats often claim to be independent from their governments.
- Tension between centralized administrations and decentralized faculties of universities —where the administrators who solicit and finance the donations are separate from the regional experts who understand the country's political context—can making vetting difficult.
- Fundamentally, there is little agreement within universities as to what exactly constitutes prohibitive reputational risk and how to mitigate it or recognize red flags.

Tackling reputation laundering should be a priority for academic institutions. Universities should conduct due diligence on prospects *before* beginning negotiations about the terms of a particular gift. They should also provide a comprehensive and searchable public list of all donations (foreign and domestic) over a specified threshold. In addition, higher education institutions should consider making its gift acceptance policy, including the ethical guidelines and core principles by which donations are accepted, publicly available. In this vein, it would be prudent for universities to encourage institution-wide ethics training, regular accountability reviews, and the participation of the student body in major endowment decisions.

Given the struggles U.S. and U.K. universities are experiencing when confronting these issues, universities in other open settings are bound to face similar challenges in combating these transnational kleptocratic and reputation laundering networks.

## INTRODUCTION: FOREIGN DONATIONS IN HIGHER EDUCATION

Over the past two decades, rapid internationalization has been a defining characteristic of the higher education sector's development in the United States and the United Kingdom. Universities have established overseas campuses; forged important new partnerships with foreign academic institutions, governments, and nongovernmental organizations; and offered new, internationally-oriented degrees and programs.<sup>1</sup> Swelling demand worldwide for Western education, including among high-net-worth individuals (HNWIs), makes the higher education sector even more attuned to these global trends.<sup>2</sup>

These internationalization trends have coincided with a surge of foreign funding to U.S. and U.K. universities. From 2007 to 2013, foreign donations—composed of foreign-based governmental entities, corporations, foundations, and individuals—contributed directly to U.S. colleges and universities, with the ten leading donor countries (including China, Hong Kong, and India) providing over \$1 billion to academic institutions.<sup>3</sup> According to more comprehensive data from the U.S. Department of Education (ED), between 2013 and 2019, the reported total of foreign donations to U.S. universities exceeded \$4 billion—though the figure is likely significantly higher.<sup>4</sup>

However, these country-of-origin data do not always capture the foreign origins of gifts adequately. As with other globalized entities like multinational corporations, HNWIs, and foundations, patrons operate transnationally, co-mingling funds among legal entities and across favorable political and tax jurisdictions, thereby blurring distinctions between “foreign” and “domestic.” Foreign-based donors actively maintain foundations or U.S.-based branches or pass-throughs. Most notably, between 2011 and 2014 the Qatar Foundation International, a charity registered in Washington, D.C., donated \$1.4 billion, primarily to six U.S. universities that also operate campuses in the small Gulf state.<sup>5</sup> Similarly, one of the largest individual gifts of the past decade—a \$350 million gift made to Harvard University in 2014 by Ronnie Chan, a dual U.S./Hong Kong national—was made through a Massachusetts-based legal entity, even though the gifting organization itself received substantial funds transferred from foreign jurisdictions.<sup>6</sup>

The U.K. higher education sector has seen similar internationalizing trends. Within the past decade, an increase in tuition fees and the ramping-up of development efforts have, according to the 2020 CASE-Ross report, led to the near-tripling of philanthropic donations received by U.K. and Irish universities (from £0.5 billion to £1.3 billion).<sup>7</sup> In the United Kingdom, there are no systematic data outlining the country of origin of donations.<sup>8</sup> However, individual schools agree that although the majority of gifts still come from U.K. and U.S. donors, fundraising is increasingly internationalized. For example, Oxford University published data that indicate a hundred-fold increase in donations from the Middle East between 2001 and 2014, with Saudi Arabia, the United Arab Emirates (UAE), and Qatar accounting for the lion's share of these amounts.<sup>9</sup> Over the late 2000s, sources gradually shifted eastward; by 2020, it is estimated that more than one-third of overseas funding to U.K. universities came from China.<sup>10</sup>

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Beyond the actual numerical increases in the total amount of foreign donations, the composition of fundraising has also changed. Major gifts comprise a growing share of donations. Universities receive, and actively solicit, larger donations from a smaller pool of elite donors. According to David Callan, from 2005 to 2015 U.S. colleges and universities received over 14,000 gifts worth at least \$1 million and at least one-hundred gifts worth \$100 million.<sup>11</sup> While the top 1 percent of donors accounted for 64 percent of the dollar amount of university giving in 2006, by 2013 this figure increased to 80 percent.<sup>12</sup> In addition, universities have ramped up their foreign outreach and alumni networks, as new groups of successful foreign nationals prioritize educational donations as part of their philanthropic activity.<sup>13</sup> Surveys suggest that education is now the most popular individual cause for philanthropic giving among global HNWIs and private individual foundations.<sup>14</sup> For instance, one survey of leading Chinese-American philanthropists indicated that donations to higher education comprised 66 percent of all large gifts (over \$1 million) made between 2008 and 2014.<sup>15</sup>

The benefits of internationalization and foreign funding are vital to the development and global stature of the U.S. and U.K. higher education institutions. Foreign funders can make invaluable long-term investments, especially in endowment income, while expanding international contacts and networks for exchanges among faculty, students, and administrators. Raising a university's international profile can cement a reputation within a highly competitive and global higher education landscape. However, the surge in foreign funding—especially contributions of large gifts from individual donors—also highlights important challenges. Universities in open societies must take greater care to scrutinize the origins of these funds. Gifts from foreign sources who are sanctioned, politically exposed, or have histories of corrupt business practices might entangle universities in legal violations and disputes. Money from tainted sources or funds earned through unscrupulous means may damage the reputational standing of a recipient. Moreover, even if due diligence can ascertain the origins of the funds, individuals themselves might intend to invest or otherwise engage with the university for purposes that run contrary to the university's own principles, values, and ethical code of conduct. This problem is a particular concern when foreign individuals and entities engage in reputation laundering—that is, to use their philanthropic donations to universities in rule-of-law settings to boost their international reputation and offset reported controversies or malfeasance back in their home country.

This report examines how foreign donors may engage with universities in open settings to launder their reputations. It draws on primary research as well as publicly available secondary data. In a survey of officers in charge of donations at U.K. and U.S. universities, the authors selected the higher education establishments most likely to attract significant funding from potentially illicit sources: the 24 Russell Group universities in the United Kingdom, and the Top 20 large U.S. universities as ranked by the 2020 edition of *US News and World Report*. The survey asked the respondents to share their institution's gift acceptance policies and the ways in which these policies have changed in recent years. The survey was designed to identify the role of university offices involved in the

gift approval process and explain whether gifts are treated differently depending on specific criteria. In the United Kingdom, 17 out of the 24 institutions contacted responded to the survey. In the United States, however, administrators were reluctant to reply or did not respond; that said, many of the surveyed institutions when asked were under compliance investigation concerning the reporting of foreign funds.<sup>16</sup> Although our findings are preliminary, they potentially capture similar funding trends and challenges confronting institutions of higher education in other open societies such as those of Australia, New Zealand, and Europe.

## BACKGROUND: INDIVIDUAL FOREIGN GIFTS AND THE CHALLENGE OF REPUTATION LAUNDERING

Numerous recent reports highlight the risk of authoritarian influencing in university or think tank settings. These activities are characterized by the use of donations or other forms of engagement to shape research and teaching agendas at academic institutions, thereby threatening the recipient's academic integrity.<sup>17</sup> These gifts and charitable activities serve an additional purpose: they launder the reputation of the individual donor. Donors who are implicated in acts of corruption, political repression and intimidation, suspicious activity, or political malfeasance may use their philanthropic activity to deflect attention from their legal issues or whitewash their role in crafting controversial policies. Reputation laundering is inherently transnational as it involves the intentional "minimizing or obscuring evidence of corruption in an authoritarian's home country and rebranding kleptocrats as engaged global citizens."<sup>18</sup>

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Reputation laundering can also serve to bolster the standing of an individual's country of origin. For example, according to the *New York Times*, wealthy Russian oligarchs are increasingly influential patrons of the arts in the West, creating significant dilemmas for flagship Western cultural organizations. A number of key arts donors were sanctioned following Russia's annexation of Crimea in 2014 and its interference in the 2016 U.S. presidential election campaign.<sup>19</sup> A recent *Foreign Policy* article draws upon a new database of philanthropic donations and finds that in recent decades, seven post-Soviet oligarchs have together donated between \$372 million and \$435 million to U.S.-based not-for-profit institutions, including universities, museums, cultural centers, and think tanks.<sup>20</sup>

Adverse developments in foreign relations and unexpected geopolitical events can also invite unwelcome attention on a university's problematic foreign associations and recast the reputation of individual donors and patrons. In one dramatic and pivotal example, in 2010, a foundation controlled by then Libyan President Muammar Qaddafi and his son Saif Qaddafi pledged a gift of £1.5 million to the Global Governance Centre of the London School of Economics and Political Science (LSE)—only for this gift to come under intense scrutiny within and outside the university as political tensions in Libya devolved into civil war in 2011. The incident led to the resignation of LSE director Sir Howard Davies in early 2011 and prompted an independent investigation that criticized the university for "a disconcerting number of failures in communications and governance within the school."<sup>21</sup> It was later revealed that LSE had conducted minimum due diligence concerning the donation and that Saif Qaddafi—who had been awarded a doctoral degree in philosophy from the university in 2008—may have plagiarized his thesis.<sup>22</sup> Similarly, in the United States, following the murder of Saudi-born *Washington Post* journalist Jamal

Khashoggi in 2018 in the Saudi consulate in Istanbul, Massachusetts Institute of Technology (MIT) undertook a review of its relationships with the Kingdom of Saudi Arabia, as senior Saudi government officials were implicated in Khashoggi's death.<sup>23</sup> These and other scandals force universities to reckon with how much favorable treatment is given to individuals who provide large donations and what the procedures should be for reviewing their gifts and roles. In terms of dealing with foreign donations, when elites from authoritarian countries seek to aggrandize their reputations through engagement in higher education, university reputations become intertwined with those of the donor.



*Protesters opposed to Libyan leader Moamer Kadhafi demonstrate outside of the London School of Economics (LSE) as Seif al-Islam Alqadhafi (unseen), son of Libyan leader Moamer Kadhafi, delivers a speech in London on May 25, 2010.*

## MECHANISMS FOR REPUTATION LAUNDERING IN HIGHER EDUCATION

When considering the potential, pernicious effects of donations—foreign and domestic—in higher education, universities are usually concerned about the origins of these gifts and their potential to grant donors undue influence on university operations and governance. Universities routinely consider the history and origins of the wealth of individual benefactors, including whether they might be politically exposed persons or whether their business or financial dealings have been called into question. Certain elite universities will scrutinize potential donors who have no previous ties to the university more carefully than alumni. At the same time, ensuring university autonomy in how to administer and spend the donation is considered a best practice, even while the donor is acknowledged or even celebrated.

A common fundraising practice is to solicit gifts from individuals to endowed funds for named faculty chairs or naming rights on buildings. Universities usually have endowed chair policies (e.g., minimum amount, approval process, and benefactor’s advisory role) designed to ensure that the position meets the terms of the benefactor while allowing freedom or selection and academic independence of the chair holder. Naming rights for buildings usually require the most substantial gifts, but usually solicit the greatest scrutiny—especially because of their implied permanence. These investments can be questioned at a later date should the reputation of the chair donor be tarnished, or general social norms shift against practices associated with benefactors, making their naming legacies no longer desirable or acceptable.<sup>24</sup>

Questions of due diligence and influence are important, but they may not always filter or deter reputation laundering. Association with a prestigious university—in the form of a high-profile gift, honorary degree, or speaking engagement—confers international legitimacy and status to donors, especially for charities and foundations that are funded by individuals and carry their names. Some of these risks include appearing to condone the governing practices and repressive policies of a donor’s regime or home nation; associating the university with comments or beliefs previously expressed by the donor; and implicating the university in ongoing litigation or criminal investigations involving the donor, including court proceedings related to libel cases (in the case of the United Kingdom) or other schemes designed to enhance their general reputations.

This section presents three pathways through which foreign individuals can wield university endowments and engagement as a method of reputation laundering: individual donations for academic programs, use of the university as a legitimizing forum for public speeches and lectures, and the loosening of admissions criteria in exchange for donations.

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## Individual Donations for Academic Programs/Schools

The most high-profile foreign donations are those intended to establish a center or institute for a particular program or course of study. Providing endowed funds to establish a program represents a long-term investment in the university and promotes a certain area of research and scholarship. In turn, such investments raise the possibility that, absent independent university governance or oversight, the donor may exert direct influence over the program's research agenda, publicly stated purpose, and scholarly profile. This risk is especially notable for institutions with Middle East or Islamic studies, as the field itself might be regarded as controversial or politicized. For example, despite the heavy criticism of Saudi Prince Alwaleed bin Talal bin Abdulaziz Al Saud's major donations in support of Islamic Studies at Harvard, Georgetown, Edinburgh, and Cambridge Universities, all of these institutions accepted the Prince's gifts.<sup>25</sup> Similar large donations for Islamic Studies programs include gifts from Sheikh Sultan bin Mohammed al-Qassimi, ruler of Sharjah, to the University of Exeter, and from Sultan Qaboos bin Said, ruler of Oman, to Cambridge.<sup>26</sup> Such donations from members of ruling families or governing elites from autocracies can be difficult to evaluate in terms of their net reputational impact. These Islamic study centers may indeed function with full autonomy and contribute to fostering intercultural understanding. However, if these donations deter academic or public scrutiny of these rulers' policies and governance, then they may erode academic freedom instead.<sup>27</sup>

Several Gulf state donors are involved in broader academic partnerships with Western universities and research centers, which itself can be regarded as part of a broader strategy to raise domestic educational standards and be personally associated with internationally recognized institutions of academic excellence. In other cases, major gifts for putatively apolitical causes, like public health or medical sciences, are made by high-profile individuals of dual nationality, with business ties to China or the former Soviet Union, and whose donations and role in think tanks and cultural institutions attract public controversy and criticism.<sup>28</sup>

Beyond the general whitewashing of an individual's reputation, major donations also can be used in legal and criminal proceedings by those who wish to bolster their claims about status or residency, and even, rights to legal protections. Consider the case of the Firtash Foundation's gift to Cambridge University. The charity, funded by Ukrainian businessman Dmitri Firtash, donated more than £6 million to Cambridge University, two-thirds of which was earmarked to establish an endowment for a program of Ukrainian studies, with additional financial aid to be provided for Ukrainian students completing master's degrees at the university.<sup>29</sup> Firtash, however, is a controversial figure. He is suspected of being deeply involved in Ukrainian gas trading schemes and maintaining what U.S. authorities characterize as close ties to organized crime syndicates.<sup>30</sup> In 2011, the head of the School of Arts and Humanities at the University of Cambridge praised Firtash's contributions both online and at a public dinner in 2013.<sup>31</sup> Six months later, Firtash was indicted by a U.S. federal grand jury for allegedly participating in an international racketeering operation; his extradition request from Vienna remains pending.<sup>32</sup> A spokesman for Cambridge revealed that a subsequent £1.95 million donation from Firtash had been frozen pending the resolution of legal proceedings.<sup>33</sup> Firtash denies any wrongdoing, maintaining that these allegations are politically motivated because of his ties to the Kremlin.

*Certain invitations, however, become instances of reputation laundering when visiting speakers are presented as global philanthropists or transnational public figures, overlooking their controversial or compromised standing in their home countries.*

A senior faculty member in Ukrainian Studies at the University of Cambridge defended the donations, arguing that Firtash had no influence in how the funds would be implemented.<sup>34</sup> However, the donations brought Firtash acclaim and a wave of positive publicity. In 2012, he received the University of Cambridge Chancellor's 800th Anniversary Campaign Medal for Outstanding Philanthropy, an honor that reportedly he displayed proudly on his charity's website.<sup>35</sup> Furthermore, Firtash also appears to have used the donations to garner legal standing and support in U.K. courts to pursue legal action against the daily newspaper *Kyiv Post*. He sought to bring charges against the newspaper for libel, after the publication published an article about his allegedly illicit business dealings in Ukraine.<sup>36</sup> The lawsuit noted that Firtash had given "a major gift . . . to the University to endow Cambridge Ukrainian Studies, part of the Dept of Slavonic Studies, and establish two permanent academic posts. The initiative is recorded as having met with strong student and public interest in Great Britain." Ultimately, the lawsuit was dismissed in 2011, with the judge ruling that Firtash did not have substantial ties to the United Kingdom. Still, the endowment clearly bolstered Firtash's reputation and standing within British society.<sup>37</sup>

### Invited Speakers and Lecturers

A second category of possible reputation laundering lies in the act of universities giving a speaking platform or other invitations to attend university-sponsored events. Universities must consider carefully to whom their platforms should be granted when developing public programming and inviting guest speakers and lecturers. Certain invitations, however, become instances of reputation laundering when visiting speakers are presented as global philanthropists or transnational public figures, overlooking their controversial or compromised standing in their home countries.

For example, in 2009, Rice University invited the president of Equatorial Guinea, Teodoro Obiang Nguema Mbasago to address the university. Nguema, Africa's longest-serving ruler, has been accused of grand corruption and dictatorial repression throughout his political career. However, the public program for his address described him in glowing terms, ignoring the severe criticism his regime faces from human rights advocates and anticorruption watchdogs:

Since the discovery of substantial oil and natural gas reserves in the mid- to late-1990s, Obiang's government has made significant investments in increasing transparency in its financial practices and diversifying its economy, modernizing its infrastructure, strengthening its public health system, and promoting education to build a strong foundation for the future of the country. . . . Obiang has also made a strategic decision to focus on diversifying the national economy to ensure successful long-term stabilization.<sup>38</sup>

More recently, in 2018 Isabel dos Santos, the daughter of Angola's former longstanding president and chair of Angola's state-owned oil giant Sonangol, was invited to speak at Yale University by its Undergraduate Association for African Peace and Development.<sup>39</sup> Following student backlash and media scrutiny of the event, the student group issued a



*Isabel dos Santos speaks at the Yale Undergraduate Association for African Peace & Development.*

clarifying statement that the invitation was not intended as an endorsement.<sup>40</sup> However, dos Santos' appearance at Yale was one in a series of university engagements that promoted her reputation as a young, female business leader focused on African development.<sup>41</sup> She came under increased international scrutiny with the publication in 2020 of the "Luanda Leaks," an extensive International Consortium of Investigative Journalists (ICIJ) investigation that explored how a plethora of relationships with Western enablers helped dos Santos amass and hide her fortune.<sup>42</sup> In the wake of the Luanda Leaks revelations, dos Santos reportedly utilized her network and public relations services in the United Kingdom and elsewhere to safeguard her reputation.<sup>43</sup>

Recent cases at U.K. universities attest to reputation laundering's wider ecosystem. In 2012, Kazakhstan's President Nursultan Nazarbayev was invited to Cambridge to give a speech on his country's progress and stability.<sup>44</sup> This invitation came mere months after his security forces gunned down peaceful protestors in the oil town of Zhanaozen, and despite his regime's kleptocratic nature. Nazarbayev's address was part of a wider international influencing and reputation laundering campaign, involving members of the British royal family and former senior British government figures, including former Conservative minister Jonathan Aitken and former Prime Minister Tony Blair. The same



*Former President of the Republic of Kazakhstan Nursultan Nazarbayev meets with Cambridge University faculty and staff in 2012.*

year, Cambridge’s Churchill College was forced to abandon plans for a “Nazarbayev Fellowship” funded by the Kazakhstan branch of the financial services company PricewaterhouseCoopers after it was accused of reputation laundering. A spokesperson for the college noted that the fellowship title referred to the university in Kazakhstan named after the president, not the man himself, arguing that it was “not the college’s intention to celebrate President Nazarbayev in making this appointment.”<sup>45</sup>

The difficult question for universities is where to draw the line—at mere rumors, at more substantiated allegations or indictments, or at the proven conviction of the prospective speaker?

### Receiving Favorable Admissions Decisions

The linkages between individual gifts and donations that earn benefactors, their family members, and associates preferential admission into academic institutions are also key areas where donor intentions deserve further scrutiny. Investigative studies of leading universities demonstrate that elite universities maintain “development lists” of applicants from families of wealthy alumni and other actual and potential donors routinely, for whom admission criteria might be less stringent than the regular applicant pool.<sup>46</sup> Strictly speaking, this pathway may be more of a transactional form of corruption than an overt method of reputation laundering. Still, university admission and affiliation confer prestige to the donor’s family, and “pay to play” arrangements are critical to the global standing of these individuals, offering new networks for overseas employment, association, and residence.



*College Admissions Consultant William "Rick" Singer was indicted on bribery, mail fraud, and money laundering charges.*

The 2019 U.S. college admissions scandals exposed not only the privilege granted to wealthy contributors, but also the critical role transnational networks of “fixers” play in colluding with university administrators and athletic coaches to gain favorable admissions decisions for domestic and foreign wealthy donors.<sup>47</sup> In one notorious instance, Chinese pharmaceuticals billionaire Tao Zhao donated a significant amount of money to Stanford University and reportedly paid admissions consultant William “Rick” Singer—who was indicted and later pleaded guilty to bribery, mail fraud, and money laundering—a sum of \$6.5 million for his services.<sup>48</sup> Zhao’s daughter was admitted to Stanford University as a recruit for the

school’s sailing team, despite her lack of any prior athletic record in competitive sailing.<sup>49</sup> The Zhao family maintains that they were “misled” by Singer and that their contribution to the university was intended as an “ordinary donation,” unrelated to their daughter’s admission.<sup>50</sup> Following the scandal, the *Los Angeles Times* conducted an additional investigation into Qatari prince Sheikh Khalifa bin Hamad bin Khalifa Al Thani’s academic career at the University of Southern California (USC). It found that “a billionaire trustee arranged a meeting between the university president and the prince’s mother,” and that the institution gave the prince “special treatment,” going to “extraordinary lengths to keep him happy” including by “forging documents” and “flouting university rules.”<sup>51</sup> The story also details how the prince’s enablers, prior to his admission, intimated the Qatar Foundation’s willingness to provide major donations to prestigious universities. Ultimately, these grants never materialized.

Study interviewees from U.S. universities confirmed that the admissions scandal carries significant ripple effects across the country’s academic landscape, highlighting the link between admissions and the contributions of wealthy or legacy donors. Although no administrators were willing to go on the record with these comments, several mentioned that some universities were known to have thresholds for foreign donations that would all but guarantee admission to the donor’s persons of interest. Moreover, the U.S. Department of Justice investigation revealed the growing role of transnational fixers who informally offer their services to overseas clients, which include targeting gifts and donations to Western universities in exchange for admissions.

*Recent attempts to enforce compliance with federal law suggest that the act was neglected routinely, both by universities that do not comply with its reporting requirements and by federal authorities that fail to issue up-to-date compliance guidance.*

## FUNDING, LEGAL OBLIGATIONS, AND REPORTING REQUIREMENTS

Universities in the United States have certain federal- and state-level legal obligations to report foreign endowments and ensure that they do not accept donations that are the result of ill-gotten gains or from individuals who are subject to sanctions or ongoing criminal proceedings. There is no such obligation in the United Kingdom or many other democracies, but the publication of the value and provenance of foreign donations is a key demand of a recent high-profile campaign for a code of conduct on academic freedom and internationalization in the United Kingdom.<sup>52</sup> Even if an individual is not formally sanctioned or designated as a politically exposed person, accepting large, publicized gifts from individuals mired in controversy can undercut a university's commitment to promote ethical governance. Although most universities have checks to ensure that gifts are not used for money laundering, the threat of reputation laundering is more difficult to identify, assess, and manage in a systematic fashion.

### U.S. Legal Requirements and Compliance Issues

In the United States, federal law imposes some disclosure on higher education for accepting donations from foreign sources. The chief among these is compliance with the Higher Education Act (1965, amended in 1998; sec. 117, also 20 U.S.C., 1011f), which requires that all contracts with foreign donors and gifts over \$250,000 in value be reported to the U.S. Department of Education (ED). Recent attempts to enforce compliance with federal law suggest that the act was neglected routinely, both by universities that do not comply with its reporting requirements and by federal authorities that fail to issue up-to-date compliance guidance. A February 2019 report from the Subcommittee on Investigations of the Senate Homeland Security and Government Affairs Committee about the People's Republic of China's (PRC) influence on American higher education found that U.S. universities "routinely" failed to report foreign gifts as required by law.<sup>53</sup> When addressing the reporting requirement concerning Confucius Institutes, the report found that the PRC's education ministry provided \$158 million to nearly 100 colleges and universities, but nearly 70 percent of those that received donations greater than \$250,000 had failed to report as required.<sup>54</sup>

In response to this congressional activity, the ED opened a compliance investigation into at least a dozen universities, including Harvard and Yale.<sup>55</sup> In addition to Chinese funding, the ED also requested information about donations from Saudi Arabia, Russia, and Qatar explicitly. A review of initial reporting documents by the *Wall Street Journal* stated that, in total, these universities failed to disclose about \$6.5 billion in foreign donations from these aforementioned countries.<sup>56</sup> In its October 2020 report, the ED learned that Yale University underreported its gifts and contracts by \$375 million, after university officials admitted previously that the university did not submit reports on foreign gifts from 2014 to 2017.<sup>57</sup> It also identified a university—Cornell University according to the *Wall Street Journal*—that failed to document \$760 million in funding for the whole

university, recounting that “university officials chose the word “dumbfounded” to explain this reporting error and provided no explanation.”<sup>58</sup> The report also noted that Harvard “appears to possess inadequate institutional controls over its foreign donations and contracts” and admonished Stanford for adopting a policy of not documenting individual foreign donor names since 2010, finding that it only reported \$64 million in anonymous Chinese donations.<sup>59</sup>

*Beyond complying with federal and state rules and reporting requirements, as well as ensuring that they do not accept foreign funds from illicit or prohibited sources, universities must also confront the challenge of vetting potential donors who endow or otherwise strategically engage with the university for purposes of reputation laundering.*

During these recent investigations, universities have maintained that specific guidance about precise disclosure and reporting procedures was ill-defined. In January 2019, the American Council on Education sent a letter notifying the ED that it had not issued any guidance on the reporting requirement, including requests for precise determinations of how the \$250,000 disclosure threshold is calculated, what types of institutions are obligated to report large donations, and the level of detail necessary about ascertaining the identity of a foreign donor.<sup>60</sup> In a February 2019 follow-up, the American Council on Education expressed particular concern about demands from the ED to disclose the names and addresses of individual foreign donors who had requested anonymity.<sup>61</sup>

At the individual level, researchers who have accepted federal funds—including from the National Science Foundation or National Institutes for Health—require that grant recipients disclose all current sources of support for projects and proposals, as well as information concerning foreign financial interests and ties.<sup>62</sup> They may also be subject to university disclosure guidelines and periodic conflict of interest certifications.

### Vetting Questions: Guidelines and Scrutiny

Beyond complying with federal and state rules and reporting requirements, as well as ensuring that they do not accept foreign funds from illicit or prohibited sources, universities must also confront the challenge of vetting potential donors who endow or otherwise strategically engage with the university for purposes of reputation laundering. Here, there are no standard guidelines or procedures, especially given that each university interprets its own “reputational risk” differently. Often, universities may not consider acts of intentional reputation laundering by individual donors and their agents to be potentially damaging to their own institutional reputations. When dealing with an individual donor from overseas, academic institutions often find themselves at a disadvantage to secure accurate and timely information about the individual’s history, business practices, and possible motives for engagement.

That said, one point was emphasized in almost all study interviews: scrutiny over associations can change dramatically, as new scandals, media attention, and changes in domestic political climates recast relationships with donors or university affiliates. These changes can happen suddenly. Media stories about universities accepting questionable gifts, in the wake of scandals involving figures like Saif Qaddafi, can inflict severe reputational damage and plunge universities into a public relations crisis. Scandals of questionable associations are amplified by social media attention. Crises that trigger backlash from current students and mobilize alumni campaigns may elevate the issue to the higher levels of university leadership and discourage more significant donations. Given the renewed scrutiny of the higher education sector, reputation management scandals in any one university damage the reputation of academic institutions across the board.

*The exposure of financial misconduct in higher education institutions, alongside the rise in importance and influence of social media networks, has prompted some positive changes.*

## **SAFEGUARDING INSTITUTIONAL INTEGRITY AT UNIVERSITIES**

The exposure of financial misconduct in higher education institutions, alongside the rise in importance and influence of social media networks, has prompted some positive changes. Prestigious universities are increasingly aware of the need to keep their reputation beyond reproach and they have adopted ethical principles and expanded review procedures in response to increased media scrutiny. Most notably, the LSE's Qaddafi case spurred change in donation review processes across the U.K. academic landscape. Several university gift managers interviewed for this study cited the 2011 Lord Henry Woolf inquiry report on the LSE's links with Libya as a "catalyst" for changes in their donation regulations and procedures.<sup>63</sup> More recently, the substantial gifts made by financier and convicted sex offender Jeffrey Epstein to elite US universities made waves in the United States.<sup>64</sup> Seemingly driven by the need to avoid similar reputational damage, U.S. institutions began to reassess the way they solicit, supervise, and accept such philanthropic contributions.

However, many challenges remain, as scandals continue to emerge on both sides of the Atlantic. This section, based on primary research encompassing written responses from eighteen leading U.K. and U.S. universities and semistructured interviews with thirteen university officers, gives an overview of the institutional procedures; the changes over the past decade; and a comparison of U.S. and U.K. trends, existing problems, and possible areas for improvement.<sup>65</sup>

### **Procedural Responses and Internal Changes**

Traditionally, universities received donations by tapping into their body of alumni, though this custom was more present in the United States than in the United Kingdom, and in the English-speaking world more than elsewhere. Changes that occurred over the past few decades, on both sides of the Atlantic, were driven by the increasing internationalization of the student body and universities' professional scope and network, including through the establishment of campuses abroad. This development pushes higher education institutions to look beyond national borders for funding. The expansion of professional degree-granting schools and programs includes accompanying, dedicated development offices that seek to tap into transnational networks of sector professionals, alumni, and acquaintances directly. Furthermore, the recent "marketization" of the higher education sector has spurred competition to attract students and donors, prompting the scaling-up and professionalization of fundraising, including expanding the pool of prospective donors beyond the university's alumni.

The imperative to attract ever larger sums of money from and for an increasingly international audience exposes university development offices to numerous challenges. Administrations now deal with donors who are less familiar to them, may not have previous

*In addition to qualms over the source of funding, apprehension toward authoritarian influence through philanthropic activity recently has attracted more scrutiny.*

university connections, and may be interested in using their gift to earn publicity or bolster their domestic and international reputation. International donors often have backgrounds that are more difficult to check, necessitating development offices to become proficient in foreign languages (especially Mandarin) and build networks of development officers and overseas alumni who can assist in the vetting of prospects. This tendency prompts increased concerns; as one UK interviewee said, “when you stray away too much from the Western hemisphere, information becomes impossible to get to.” Even with increasingly sophisticated measures to unearth information about potential donors such as social media profiles, some interviewees admitted that there could be a silver lining to the lack of information: “This is a disadvantage and an advantage, because [in the case of adverse publicity repercussions] we can say that we honestly did not know.”

In addition to qualms over the source of funding, apprehension toward authoritarian influence through philanthropic activity recently has attracted more scrutiny.<sup>66</sup> Despite these common ethical and security concerns, there is currently no standard procedure or institutional configuration for conducting due diligence for universities. Trends in the United Kingdom and the United States present noteworthy similarities and differences.

### Trends in the United Kingdom

Although philanthropic donations lack specific statutory provisions under U.K. law, elite British universities are no less aware of the need for screening donations than those in the United States. Following a tide of criticism from government, parliament, and the media regarding authoritarian influence, the professional association Universities U.K. (UUK) has published a “Security Guidelines for Universities” study.<sup>67</sup> The range of issues included in the UUK report goes well beyond that of foreign gifts; it addresses the protection of foreign faculty and students, the academic integrity of research, the protection of intellectual property, the safety of fieldwork, and the integrity of foreign campuses. Given that public attention is heightened, U.K. universities seem keen to demonstrate their awareness of this issue by cooperating with this report’s research.

The risk here is that the British government will follow the lead of the United States and Australia and impose top-down solutions that limit institutional autonomy and academic freedom without increasing transparency or accountability. An alternative for the U.K. is the widespread but voluntary adoption by universities of a code of conduct, such as that published in draft form by the Academic Freedom and Internationalization Working Group (AFIWG), of which two of the authors are members, in October 2020.<sup>68</sup> The AFIWG’s code requires universities, inter alia, to:

Make all MoUs and summary information on all foreign gifts/donations public, and include a section in [an] annual report on the operation of the MoUs and any other foreign gifts/donations, with specific reference to academic freedom risks that have arisen or are on-going and how these are being mitigated; and further undertake, in connection with any such funding arrangements, not to enter into non-disclosure agreements.<sup>69</sup>

Such transparency is wholly lacking at present in the U.K.

*The scrutiny to which gifts are subject differs depending on the donation's provenance. Donations coming from the post-Soviet space often are treated with an added degree of caution, especially after Russia's 2014 invasion of Crimea.*

According to the U.K. responses received, gifts to universities are typically handled by an office in charge of development and (occasionally) of alumni relations, in conjunction with some form of advisory body (for example, a Gift Review Committee) that reviews the largest or riskiest donations. The thresholds for conducting due diligence and for determining the level of oversight required vary greatly from one institution to another. Minor gifts usually are subject to a risk-based approach, midsize gifts require the approval of a head of department, and larger donations are often subject to a review by senior university officers or by a high-level committee.

The scrutiny to which gifts are subject differs depending on the donation's provenance. Donations coming from the post-Soviet space often are treated with an added degree of caution, especially after Russia's 2014 invasion of Crimea. Indeed, several university officers indicated that gift committees were influenced by events in the news that potentially could create reputation management risks. Furthermore, donations from China increasingly are becoming a matter of concern for university administrators. Again, however, there is no overarching rule in how to assess country risk. Some universities have developed "heatmaps" based on external indicators, such as Transparency International's CPI; other institutions consider committee decisions and previous experience; while others operate on a purely case-by-case basis.

Most U.K. universities stated that they conduct the due diligence internally, using open-source data. In most cases, university research officers could count on at least one paid-for software used to detect the ownership of any assets as well as connections among companies and individuals. Some of the bigger institutions also employ external services on occasion to conduct background checks, especially in cases that require specific language skills or are highly complex. The length of the process varies wildly, depending on the provenance, size, and nature of the gift. Larger universities highlight the importance of starting the process early and conducting screenings twice: once at the beginning of the relationship with a potential donor and again when the gift is formally put forward.

When asked how many gifts were formally rejected for failing to comply with ethical guidelines, universities reported low numbers, ranging from no rejections at all to a maximum of four rejections over the past year. The interviewees attributed the reason for the low number of rejections to the protracted process in place: if a prospective donor is found to be clearly not aligned with the university's values, the decision not to proceed with the relationship would be taken before even being brought before the high-level gift approval committee.

Institutions that have an established history and track record in attracting donations can usually count on a dedicated gift management/acceptance team with a well-developed checklist and set of procedures—a luxury not shared by smaller or less established institutions. In all cases, universities indicate that discussions and changes are ongoing in this area, thus clearly underlining the fluidity of the subject as well as its timeliness. Interestingly, most U.K. interviewees were convinced that the regulations present in U.K. institutions are much more stringent than those in vogue in the United States.

*Transparency about the origin and size of donations is also a challenge for most universities. Contacts and discussions with donors can be sensitive and competitive, leading to confidential meetings and negotiations between donors (or their representatives) and university administrators.*

## Trends in the United States

Given U.S. federal and state foreign reporting requirements, university development is one of many academic institutional offices and functions that must manage compliance with laws and regulations. The reporting burden (tallying the sum of foreign gifts, contracts, and grants) usually falls on the general counsel's office, which coordinates with offices of development or alumni affairs, institutional funding, and expert controls. Of the leading twenty universities as ranked by the 2020 *US News and World Report*, twelve list university fundraising, development, or gift acceptance policies publicly on their websites; although two appear to display these for their own communities, behind password protection or other internal means. Out of these twelve, only three mention ethical guidelines and only one addresses donations from non-U.S. sources. Interestingly, two universities each maintain an explicit giving page for international donors along with the contact information of a development officer responsible for international gifts.

These publicly-facing policies rarely mention due diligence or source vetting. For the most part, they discuss financial procedures and accounting of gifts or thresholds for various types of endowments. At best, they may explicitly mention how to deal with conflicts of interests in directly sponsored research. Decision-making processes and principles guiding acceptance or denial of donations from individuals remain mostly undisclosed or internal to each institution.

Transparency about the origin and size of donations is also a challenge for most universities. Contacts and discussions with donors can be sensitive and competitive, leading to confidential meetings and negotiations between donors (or their representatives) and university administrators. But a few universities appear to have adopted a “gold standard” policy of making information about all university gifts and donations publicly searchable via their websites. Donations made to universities anonymously is an increasingly thorny issue. Although tolerated—even welcomed—in the past, compliance now necessitates that at least a small group of university representatives ascertain the exact identity of the donor prior to accepting the gift.

Another important dimension is the level of guidance and training given to gifts and development officers about reputational risk and vetting potential prospects. Universities may provide briefings and standardized materials for all development officers and professionals, but given that a single university can employ hundreds of development officers across dozens of autonomous schools and units, delegation issues and potential principal-agent problems—when one individual is authorized to make decisions that affect the institution as a whole—pose risks. Furthermore, while some universities mandate that each officer must address a standard list of questions for each prospect, others prefer to allow officers the discretion for minimizing risk as they cultivate prospects. Although large-scale gifts are vetted centrally in all cases, non-major gifts to U.S. universities can still reach up to \$250,000 without being rigorously scrutinized.

*Practically speaking, donor research done by alumni relations and development staff is often guided by solicitation etiquette and designed to develop engagement and stewardship strategies, rather than to investigate sources of wealth.*

One trend is clear: universities have serious concerns about reputational risk, but there is little agreement as to what exactly constitutes prohibitive “reputational risk” and how to mitigate it or recognize red flags. However, there is now a broad consensus that the status of named rights, honorary degrees, and university affiliations is subject to current events and may be susceptible to rapid change or revocation. Thus, reputational management is not just a one-time vetting process, but a recurring concern for evaluation.

### Persistent Weaknesses

What, therefore, are the obstacles for the higher education sector to improve their rules for uniform, consistent acceptance of philanthropic donations? The susceptibility to media trends, of which many interviewees spoke openly, is one area of concern. This issue raises the question of whether gift approval policies constitute a consistent approach based on solid ethical and moral values, or whether they are open to influences from external factors. The research conducted for this paper suggests that the latter factor—the logics of consequence—is still a stronger motivator for conducting due diligence than logics of appropriateness.

Among the additional challenges, there is also a marked difference in standards: what is defined as a “large gift” deserving of heightened scrutiny varies drastically between smaller and larger institutions, and between the United Kingdom and the United States. By way of comparison, some lesser-known universities among the United Kingdom’s Russell Group have reported that they consider any gift above £10,000 as a “large gift,” therefore necessitating a stringent process of due diligence. For some U.S. Ivy League universities, by contrast, this figure stands at \$10 million and above. While smaller universities may be wary of gifts that are relatively smaller than those offered to “big shot” universities, they also may be penalized because they do not have the resources for a dedicated professional donor review team.

Practically speaking, donor research done by alumni relations and development staff is often guided by solicitation etiquette and designed to develop engagement and stewardship strategies, rather than to investigate sources of wealth. Moreover, gift review committees are tasked primarily with protecting the legal interests of the university, considering conflicts of interest, and only occasionally managing the university’s reputation. These operating procedures leave gray areas for accepting donations from questionable or un reputable sources. Committee members ultimately may face significant pressure to not get in the way of a potential large gift.

A final significant challenge, mentioned by many respondents (and affecting large, decentralized universities in particular), appears to be the need to implement the ethical precepts across the whole institution. As a consequence of not being able to control all members of their faculty, university officers state, there might be cases in which a “rogue academic” makes a bad call in accepting some form of association, speaking engagement, or donation from a dubious source. Whether this “bad apple” argument is a sufficient and satisfactory alibi to explain the persistent issues in this field remains to be seen.

*Moreover, many of today's funders are not merely individual, politically exposed persons, but companies and the states with which they are associated, blurring the distinction between reputation laundering, authoritarian influencing, and commercial interests.*

## CONCLUSION AND KEY FINDINGS

The question of improper foreign influence on higher education must be understood in terms of the broader contours of reputation laundering across private and public sectors. As internationalized institutions behave increasingly like their corporate counterparts, universities are keen to safeguard their own reputations while remaining open for business. Moreover, many of today's funders are not merely individual, politically exposed persons, but companies and the states with which they are associated, blurring the distinction between reputation laundering, authoritarian influencing, and commercial interests. The controversy concerning the use of Huawei technology at many universities exemplifies this complexity: The image of Chinese elites, the preferences of the Chinese Communist Party, and the investments of a putatively private Chinese company are all at stake. The opaqueness of gifts and the means by which they come about—both in the United Kingdom, where transparency is almost entirely lacking, and in the United States, where institutions are required but sometimes fail to publish itemized data—makes universities all the more subject to suspicion. Increasingly, students in both countries have been voicing their concerns on this matter, by raising the issues of transparency and potential complicity with authoritarian regimes in hard-hitting articles in their institution's student newspapers.<sup>70</sup>

Although this paper addresses some of the issues and trends in foreign gifts and reputation laundering in the United States and the United Kingdom, we invite researchers to explore the issues as they are impacting higher education in other democracies where similar vulnerabilities may be present. Though much remains to be done in the realm of transparency, U.S. and U.K. administrators have been responding to pressure for disclosure and media reporting by establishing vetting and diligence procedures, however imperfect they may be. These challenges are just as likely to impact other open countries where foreign gifts traditionally have not been a major source of funding but are now actively being offered and sought. In recent years, countries such as the Czech Republic and Germany have witnessed high-profile scandals involving funding from China, both in exerting influence through opaque payments to faculty or through the application of PRC law to the contract.<sup>71</sup>

The core problem here appears to be one of nondisclosure: the lack of transparency about reporting gifts and absence of institutionalized accountability about the process of scrutinizing them. Such openness must begin within universities; staff and students should be involved in the process of decision making about gifts before they have been accepted. In the United Kingdom, members of the faculty and student bodies may be coopted onto the gifts committee from their positions as elected senators and guild officers. Gifts accepted must then be reported to a public body and published with sufficient detail to discern relationships between individual donors and recipient departments in all instances, except those where the case for anonymity has been accepted by the committee. In the United States, public reporting is a legal requirement, but its adherence and enforcement is inadequate owing to the compartmentalization and professionalization of development offices and the absence of clear ED guidance.

This report offers the following recommendations to universities:

- Conduct due diligence on prospects *before* entering into negotiations concerning the terms of a particular gift. University representatives should ascertain the following:
  - The donor's identity, including the ultimate beneficial owner of any legal entity donors.
  - The donor's citizenship/residency.
  - Whether the donor is on sanctions or other law enforcement watchlists.
  - Whether the donor is a politically exposed person requiring enhanced due diligence.
  - The source of funds used to make the proposed donation.
  - Involvement of the donor in current legal proceedings, or any criminal history or allegations linked to the donor.
  - Negative news media coverage.
- Provide a comprehensive and searchable public list of all donations (foreign and domestic) over a modest threshold (£10,000/\$15,000), including the identity of donor, the amount, and major stipulations.
- Make the university's gift acceptance policy, including the ethical guidelines and core principles for all donations publicly available.
- Mandate annual ethical training for all development officers, even if due diligence is not a formal part of their portfolios.
- Adopt a formal policy of refusing to consider donations from a donor, foreign or domestic, whose family member or associate is currently in the admissions process.
- As part of efforts to enhance accountability, create a mechanism, such as a committee or petition procedure, through which university associates and interested outside parties can file a request for the university to review its association with a specific donor on ethical grounds or provide new information regarding the donor's reputation.
- Empower the student body to keep these problems in check, by providing an open space for debate, supporting student newspapers and student-led public events, and thus recognizing the crucial role students play in enhancing accountability in higher education.

Universities are foreign policy actors; they exercise judgments about who they work with and from whom they accept money. In a highly competitive environment and with little dedicated capacity or incentive to conduct due diligence, the implementation of their policies in practice is driven by the vicissitudes of geopolitics. In such environments, scandals such as the Qaddafi-LSE connection erupt where events make a preexisting relationship suddenly unacceptable. As a result, reactivity often is the default position; more proactive stands on ethics are rare. This situation is not a matter of the absence of policies and committees, but rather of the lack of incentives and the uncertain conditions under which policies are made and committees formed. University faculty, institutes, and affiliates now are at the forefront of important new research into transparency and governance networks. As institutions, centers of higher education should also be at the forefront of promoting best practices and their supporting norms.

## ENDNOTES

1. According to the American Council on Education's *Mapping Internationalization* report, 73 percent of U.S. institutions reported partnerships with academic institutions outside of the United States, 34 percent with NGOs, 17 percent with foreign governments, and 12 percent with corporations. American Council on Education (ACE), *Mapping Internationalization on U.S. Campuses* (Washington, DC: ACE, 2017), 24 (Figure 16), [www.acenet.edu/Documents/Mapping-Internationalization-2017.pdf](http://www.acenet.edu/Documents/Mapping-Internationalization-2017.pdf).
2. According to the 2016 Knight Frank survey, ultra high-net-worth individuals (HNWIs) globally were, from 2006 to 2015, on average 76 percent more likely to send their children overseas for education. Knight Frank, *The Wealth Report: The Global Perspective on Prime Property and Investment* (London: Knight Frank, 2016), 70, <https://content.knightfrank.com/research/83/documents/en/wealth-report-2016-3579.pdf>.
3. Of these, Hong Kong was the leading source of foreign funds (\$181 million), followed by the United Kingdom (\$147.6 million), Canada (\$136 million), India (\$97.5 million), and Saudi Arabia (\$97 million). "Hong Kong Tops List of Foreign Donors to U.S. Schools," *Wall Street Journal*, 22 September 2014, [www.wsj.com/articles/hong-kong-tops-list-of-donors-to-u-s-schools-1411401637](http://www.wsj.com/articles/hong-kong-tops-list-of-donors-to-u-s-schools-1411401637).
4. "Section 117 of the Higher Education Act of 1965," U.S. Department of Education, 19 January 2021, <https://www2.ed.gov/policy/highered/leg/foreign-gifts.html>.
5. According to the Associated Press, these are Texas A&M, Georgetown, Cornell, Carnegie Mellon, Northwestern, and Virginia Commonwealth; see Collin Binkley, "While Trump Praises Qatar, Education Officials Seek Scrutiny," Associated Press, 10 July 2019, <https://apnews.com/article/20a162e45d5444829d2e9d0a11aeabdb>. The Qatar Foundation International (QFI) is a Washington, D.C.-based LLC, registered since 2011 in the state of Delaware, stated to be dedicated to supporting primary and secondary learners and educators. Because it is registered as an American entity, the payments are nominally identified as domestic grants. However, tax filings and public disclosures highlight the QFI's relationship with the Qatari government and the financing provided by Qatari entities—as well as how such entities restructure themselves to conceal disclosures. See Erica L. Green, "Universities Face Federal Crackdown over Foreign Financial Influence," *New York Times*, 30 August 2019, [www.nytimes.com/2019/08/30/us/politics/universities-foreign-donations.html](http://www.nytimes.com/2019/08/30/us/politics/universities-foreign-donations.html). The authors thank Casey Michel for the investigative reporting on this note.
6. Chan oversees a Massachusetts-based nonprofit called the Morningside Foundation, which has been a major educational donor in recent years to the Harvard School of Public Health, Johns Hopkins University, the University of Vermont, and the Berklee College of Music in Boston. In his personal capacity, Chan and his wife have likewise donated at least \$20 million to USC, where Chan has been a member of the Board of Trustees since 1995, including the "largest ever single donation to any occupational therapy program in the history of the field," according to USC. However, while the Morningside Foundation remains based in Massachusetts, its tax filings reveal that a series of non-American entities in Hong Kong, Monaco, and elsewhere act as significant benefactors to the foundation. The authors thank Casey Michel for the investigative reporting on this note.
7. Council for Advancement and Support of Education, *CASE-Ross Support of Education: United Kingdom and Ireland 2020. Generating Philanthropic Support for Higher Education* (London: CASE, 13 May 2020), [www.case.org/system/files/media/file/CASE-Ross\\_2020Report\\_2018-19.pdf](http://www.case.org/system/files/media/file/CASE-Ross_2020Report_2018-19.pdf); and CASE-Ross infographic (2020), [www.case.org/system/files/media/file/CASE-Ross2020Infographic.pdf](http://www.case.org/system/files/media/file/CASE-Ross2020Infographic.pdf).

8. The only national-level review, the abovementioned CASE-Ross survey, does not take into account geographies of origin.
9. Response by the University of Oxford to Naeem Ahmad, "Sources of Funding," WhatDoTheyKnow, 24 March 2015, [www.whatdotheyknow.com/request/sources\\_of\\_income\\_17#incoming-632293](http://www.whatdotheyknow.com/request/sources_of_income_17#incoming-632293).
10. As quoted in Richard Adams, "UK Universities Accused of Overreliance on Fees from Chinese Students," *Guardian*, 23 July 2020, [www.theguardian.com/education/2020/jul/23/uk-universities-accused-overreliance-fees-chinese-students](http://www.theguardian.com/education/2020/jul/23/uk-universities-accused-overreliance-fees-chinese-students).
11. As quoted in Mark Dodgson and David Gann, "Universities Need Philanthropy but Must Resist Hidden Agendas," WeForum, 15 February 2018, [www.weforum.org/agenda/2018/02/universities-need-philanthropy-but-must-resist-hidden-agendas/](http://www.weforum.org/agenda/2018/02/universities-need-philanthropy-but-must-resist-hidden-agendas/).
12. Michael J. Worth, Sheela Pandey, Sanjay K. Pandey, and Suhail Qadummi, "Understanding Motivations of Mega-Gift Donors to Higher Education: A Qualitative Study," *Public Administration Review* 80, no. 2 (2020), 282.
13. Of the leading 20 U.S. universities in 2019, although Harvard University boasted by far the greatest number of HNWI alumni (13,650, compared with second-place Stanford University's 5,580), the greatest proportion of international HNWI alumni by origin were in Boston University (41 percent), USC (34 percent), and MIT (31 percent). See Wealth-X, *University High Net Worth Alumni Rankings 2019* (New York, Wealth-X, August 2019), [www.wealthx.com/wp-content/uploads/2019/08/University-Ultra-High-Net-Worth-Alumni-Rankings-2019.pdf](http://www.wealthx.com/wp-content/uploads/2019/08/University-Ultra-High-Net-Worth-Alumni-Rankings-2019.pdf).
14. According to the Hauser Institute for Civil Society's Global Philanthropy report, 35 percent of global foundations focus on education. Paula Johnson, *Global Philanthropy Report* (Cambridge, MA: Hauser Institute for Civil Society, Harvard University, 2018), 23. According to the 2018 Knight Frank survey of UHNWI managers, 54 percent of clients were most likely to support education in their philanthropic giving, followed by health (43 percent), environmental issues (34 percent), and the arts (30 percent). Knight Frank, *The Wealth Report: The Global Perspective on Prime Property and Investment* (London: Knight Frank, 2018), 82, <https://content.knightfrank.com/resources/knightfrank.com/wealthreport2018/the-wealth-report-2018.pdf>.
15. V. Kuo, J. Miao, T. Feng, and M. Hu, *Chinese and Chinese-American Philanthropy: Global Chinese Philanthropy Initiative Report* (Los Angeles: UCLA, 2017), 28, [www.international.ucla.edu/media/files/GCPI\\_Report\\_Single-Pages-jn-hn5.pdf](http://www.international.ucla.edu/media/files/GCPI_Report_Single-Pages-jn-hn5.pdf).
16. The review included 10 in-depth interviews with U.K. respondents who indicated that they would be willing to provide additional information. This follow-up stage discussed in detail the way their decision-making process works, sought to understand the red flags considered by the officers in charge, and explored the motivations behind the process. By contrast, only 3 U.S. institutions out of the 20 contacted agreed to share further information on this topic. For the U.S. side, this report instead comments on governance procedures from publicly available information. A current list of "Notices of Investigation and Records Requests" to 19 U.S. universities, along with related documentation, can be found on the U.S. Department of Education website that provides information about Section 117 of the Higher Education Act of 1965: [https://www2.ed.gov/policy/highered/leg/foreign-gifts.html?utm\\_content=&utm\\_medium=email&utm\\_name=&utm\\_source=govdelivery&utm\\_term=](https://www2.ed.gov/policy/highered/leg/foreign-gifts.html?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=).
17. Thorsten Benner, "An Era of Authoritarian Influence?," *Foreign Affairs*, 15 September 2017, [www.foreignaffairs.com/articles/china/2017-09-15/era-authoritarian-influence](http://www.foreignaffairs.com/articles/china/2017-09-15/era-authoritarian-influence); and Eric Lipton, Brooke Williams, and Nicholas Confessore, "Foreign Powers Buy Influence at Think Tanks," *New York Times*, 6 September 2014, [www.nytimes.com/2014/09/07/us/politics/foreign-powers-buy-influence-at-think-tanks](http://www.nytimes.com/2014/09/07/us/politics/foreign-powers-buy-influence-at-think-tanks).

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18. Alexander Cooley, John Heathershaw, and Jason Sharman, "The Rise of Kleptocracy: Laundering Cash, Whitewashing Reputations," *Journal of Democracy* 29, no. 1 (January 2018): 39–53.
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The International Forum for Democratic Studies at the National Endowment for Democracy (NED) is a leading center for analysis and discussion of the theory and practice of democracy around the world. The Forum complements NED's core mission—assisting civil society groups abroad in their efforts to foster and strengthen democracy—by linking the academic community with activists from across the globe. Through its multifaceted activities, the Forum responds to challenges facing countries around the world by analyzing opportunities for democratic transition, reform, and consolidation. The Forum pursues its goals through several interrelated initiatives: publishing the *Journal of Democracy*, the world's leading publication on the theory and practice of democracy; hosting fellowship programs for international democracy activists, journalists, and scholars; coordinating a global network of think tanks; and undertaking a diverse range of analytical initiatives to explore critical themes relating to democratic development.

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