

March 24, 2025

ISGAP Statement on the DETERRENT Act

The Institute for the Study of Global Antisemitism and Policy (ISGAP) applauds the bipartisan Defending Education Transparency and Ending Rogue Regimes Engaging in Nefarious Transactions (DETERRENT) Act as it advances to a vote in the U.S. House of Representatives next week.

The DETERRENT Act is vital legislation to increase transparency and accountability in the foreign funding of American institutions of higher education. We commend Representative Michael Baumgartner (R-WA) and Education and Workforce Committee Chairman Tim Walberg (R-MI) for their leadership in reintroducing this bill and urge all House Members to support its passage.

For decades, ISGAP has been at the forefront of studying and combatting contemporary antisemitism, working at the academic level to identify and counter antisemitic narratives. Through our “Follow the Money” project, we investigate illicit funding of U.S. universities by foreign governments, foundations, and corporations that promote antidemocratic and antisemitic ideologies.

Since Hamas’s terrorist attacks against Israel on October 7, 2023, ISGAP has published 11 reports exposing tens of billions of dollars in undisclosed foreign funding to U.S. universities—primarily from Qatar.¹ This funding, required by law to be reported to the Department of Education, remains unaccounted for. Our research also found a 300 percent increase in antisemitic incidents on campuses receiving donations from Middle Eastern countries. While antisemitism in academia has been pervasive for years, this surge underscores the increasingly hostile environment facing Jewish students and faculty in the wake of Hamas’s attack.

ISGAP strongly believes that transparency regarding American universities’ partnerships with foreign entities is essential to safeguarding academic integrity and national security. The DETERRENT Act addresses this need through several critical provisions:

- **Lowering the Reporting Threshold:** By reducing the foreign gift reporting threshold from \$250,000 to \$50,000—and implementing a zero-dollar threshold for countries of concern—the Act ensures comprehensive oversight of foreign influence in higher education. This measure will expose financial relationships that could compromise academic independence or national security.

¹ Our most recent report—the 12th installment in the “Follow the Money” series—examines the Choices Program, a national education initiative for K-12 social studies curriculum housed at Brown University. The program, which combines licensed curriculum units, free online content, and professional education workshops, is used by 8,000 schools nationwide, reaching over one million students. Our investigation uncovered extensive foreign influence and anti-Israel bias within the Choices curriculum, including undisclosed foreign funding and systematic distortion of historical facts aimed at delegitimizing Israel.

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- **Enhancing Transparency:** Provisions for reporting to Congress, intelligence agencies, and the public will facilitate proper oversight and informed decision-making. This is especially important following the Department of Education's removal of the Section 117 Interactive Data Table, which has hindered research and analysis of foreign funding sources.
- **Protecting Intellectual Property:** Requiring individual staff and faculty at research institutions to disclose foreign gifts helps shield intellectual property and research integrity from foreign exploitation.
- **Addressing Endowment Investments:** The Act's focus on private institutions' endowment investments fills a critical gap in current oversight, helping to identify potential conflicts of interest and maintain institutional independence.
- **Ensuring Accountability:** Enforcement mechanisms—including fines and potential loss of Title IV funding for non-compliant institutions—provide the necessary incentives for universities to uphold their reporting obligations.

ISGAP strongly supports the DETERRENT Act as a balanced approach to strengthening transparency while preserving legitimate international collaboration at our colleges and universities. We urge Members of the House to pass this essential legislation to safeguard our educational institutions, protect our research enterprise, and reinforce our national security.

Sincerely,

Dr. Charles Asher Small

Founder and Executive Director

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