

August 22, 2022

The Honorable Elizabeth Warren
United States Senate
Washington, D.C. 20510

Dear Senator Warren:

Thank you for your letter of July 15, 2022 requesting information related to the Brookings Institution's policies and practices and other matters. As the institution's new interim president, I am committed to upholding the quality and integrity of our research for which we have long been known and continuing to ensure that our policies reflect the highest standards of excellence and independence among public policy organizations.

The following is a response to the specific questions in your letter:

1. What, exactly, is the Brookings policy with regard to its fellows, or its employees, receiving compensation or engaging in other financial relationships with foreign governments or private sector entities?

Brookings personnel are subject to Brookings's [Independence and Integrity Policies](#), which focus on topics such as research independence, plagiarism and research misconduct, conflicts of interest, and nonpartisanship. These policies are designed to protect the integrity and objectivity of Brookings's scholarship and operations, which constitute the Institution's principal assets. In addition, Brookings employees may not engage in activities – whether Brookings activities or outside activities of their own – that would require registration under the Foreign Agents Registration Act (FARA).

Brookings's [Conflict of Interest \(COI\) Policy](#) makes clear that Brookings personnel “should always perform their Brookings responsibilities in the best interests of the Institution” and “should be free from influences that may benefit themselves or third-parties when conducting Brookings business.” The COI policy expressly prohibits personnel from acting on behalf of Brookings in matters where an actual or potential conflict of interest may exist. Likewise, Brookings personnel may not accept travel, gifts, or entertainment from a third party that would unduly influence them in the performance of their duties.

In addition to these requirements, the COI Policy requires that Brookings employees obtain approval prior to engaging in a formal paid or unpaid advisory role for any government entity, as well as prior to accepting outside board positions, ongoing paid outside activities including consulting, or other roles that are compensated above a certain threshold. Regardless of the employee's position or level of compensation, Brookings personnel must also disclose other outside activities that relate to their Brookings responsibilities. To promote transparency, the COI policy further requires Brookings personnel to disclose relevant activities and/or roles, including any of the above categories requiring prior

approval, on their Brookings website biography and in written work products with related subject matter.

Brookings requires its employees to complete disclosure forms of their outside activities on an annual basis. On an ongoing basis, Brookings personnel are required to disclose any new circumstances in which actual or potential conflicts of interests may arise. Brookings senior management routinely reviews requests to engage in several broad categories of outside activities, as well as other activities posing potential conflict issues. The factual circumstances vary widely, including such situations as an appointment to a board (fiduciary or advisory, for-profit, or nonprofit), ongoing consulting, serving as an expert witness, formal paid or unpaid governmental advisory roles, and/or activities resulting in compensation above a certain threshold. In some cases, senior management will decide to deny the individual's request to engage in the conduct because it poses a conflict. In other cases, rules will be put in place to mitigate the risk of any potential conflict. Such parameters include, by way of example, personnel not being able to receive funding for their Brookings responsibilities from the relevant outside organization(s); having to recuse themselves from Brookings discussions or decisions relating to such entities (and vice versa); and being required to disclose publicly such activities or affiliations on their Brookings website biography, on their CV, and on Brookings work products related to the subject matter of the outside activity.

2. When did Brookings become aware of any fees the Qatari government paid directly to Allen or any other Brookings fellows, employees, or contractors?

a. Did Brookings require disclosure of any fees the Qatari government paid directly to Allen at the time that he was a distinguished fellow at Brookings?

b. Did Brookings require disclosure of any fees the Qatari government paid directly to Allen at the time that he was Brookings president, or when he was in discussions to become president?

Brookings is not aware of fees paid by the Qatari government to John Allen. Brookings's policies in place during the relevant period required employees to seek prior institutional approval for and to disclose a formal paid or unpaid governmental advisory role, an ongoing consulting arrangement, as well as any outside activity involving payments above a certain threshold.

3. When did Brookings become aware of any other business relationship that Allen had with, on behalf of, or brokered by the Qatari government?

a. Did Brookings require disclosure of any other business relationship that Allen had with, on behalf of, or brokered by the Qatari government at the time that he was a distinguished fellow at Brookings?

b. Did Brookings require disclosure of any other business relationship that Allen had with, on behalf of, or brokered by the Qatari government fees at the time that he was Brookings president, or when he was in discussions to become President?

Brookings is not aware of another business relationship that John Allen had with, on behalf of, or brokered by the Qatari government except as has been publicly reported, including through the publication of a search warrant affidavit, which Brookings became aware of through media reports. Brookings's policies in place during the relevant period required employees to disclose business relationships with foreign governments.

4. Does Brookings have any policy requiring public disclosure of outside compensation paid to its employees, or any business relationships they may have with foreign governments or private sector entities?

Yes, as described above.

5. Does Brookings have in place any other memorandums of understanding (MOU) with other foreign governments? If so, please provide a list of all such MOUs, including a. The country providing the financial support, and the amount of support provided. b. The terms and conditions of the MOU, including any term or condition that may dictate control or allow input into the choice of topics or editorial control of material by Brookings staff or fellows.

As a globally oriented nonprofit, Brookings receives financial support from a diverse array of U.S.- and internationally-based donors, including foreign governments, which typically make up less than 10% of Brookings's overall funding per year. Brookings publicly discloses the funding it receives, including from foreign governments, in Brookings's [Annual Report](#).

Brookings's financial support from foreign governments is documented in funding agreements. These agreements require donors, including foreign governments, to acknowledge the Institution's research independence. In written agreements, funders acknowledge the principles that (i) Brookings scholars, in conformity with Brookings's mission of developing independent, nonpartisan analysis and recommendations that reflect objective and rigorous scholarship, make the final determinations regarding their scholarly activities (e.g., the research agenda, findings and recommendations, publication use and distribution); and (ii) that Brookings scholars and staff will at no time lobby or otherwise promote the interests of any donor or any other third party, nor will Brookings's scholars or staff act as an agent of, nor under the direction or control of, such funder, or otherwise engage in activities that would require registration as an agent of a foreign principal under FARA. As a matter of policy, Brookings does not engage in commissioned, proprietary research.

6. What is Brookings' policy regarding editorial input, agenda review, or budget review from outside entities with a financial stake in the issues under consideration for studies published by Brookings or Brookings-affiliated researchers?

Per Brookings's Research Independence Policy and Donor Guidelines, Brookings will only accept funding from donors who support the independence of our scholars' research and who do not seek to compromise or influence their recommendations. Brookings does not accept funding from donors who would impinge on the independence of scholars' research or otherwise predetermine or influence findings. Brookings has worked to institute and maintain policies and processes to require a thorough internal review of potential funding and terms of support, as well as standards for independence, transparency, and disclosure related to its funding. Accordingly, Brookings is responsible for the final determinations regarding the Institution's activities, including the research agenda, budget, content, product, outcomes, use and distribution of resulting publications, and selection of research personnel.

Brookings personnel are expected to uphold these principles in their work and avoid potential conflicts of interest and other activities that could undermine or call into question the independence of the Institution or its scholars.

7. Has Brookings initiated any independent reviews in the past 10 years to determine whether its activities are in compliance with the Lobbying Disclosure Act and the Foreign Agents Registration Act? If so, what were the results of these reviews?

Brookings regularly consults with outside law firms with relevant expertise to ensure compliance with lobbying rules and FARA. There have not otherwise been any independent reviews regarding these issues.

8. What additional actions has Brookings taken since the allegations regarding Allen were made public?

Brookings undertakes efforts to ensure that our employees and affiliates are aware of and complying with our key policies through internal communications, training, and certification requirements. The Institution refines these policies periodically in response to new and evolving developments. With new leadership in place, Brookings senior management will continue to review and update its policies and training relating to independence, integrity, and funding as warranted.

* * *

Thank you for the opportunity to provide this information regarding Brookings. We remain available for further discussion about these important topics.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Liu". The signature is fluid and cursive, with a large initial "A" and a long, sweeping underline.

Amy Liu
Interim President