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U.S. Education Policy Toward China, 2017–2026: Higher-Education Governance, Research Security, and Conditional Engagement

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ABSTRACT

Higher-education cooperation was once a major area of U.S.–China engagement, but since 2017 it has increasingly been governed through research-security and risk-management requirements. This article analyzes how U.S. federal policy toward China between 2017 and 2026 has reshaped the governance of higher-education internationalization. Using a qualitative documentary analysis of a purposively selected corpus of U.S. legal and policy documents, federal reports, and peer-reviewed studies, it examines three policy domains: student and researcher mobility; academic and research cooperation; and China-linked educational organizations and partnerships. The findings show that policy combines selective restriction with conditional engagement: exchange and cooperation continue, but access, funding, and partnerships are increasingly conditioned on screening, disclosure, and institutional risk management. The article contributes a cross-domain synthesis showing how different policy instruments allocate responsibilities for risk assessment to universities and researchers, and it discusses the limits of the evidence on unintended consequences for scientific collaboration. Because the study relies on documentary sources and includes no institutional data from Vietnam, its implications for Vietnamese higher education are presented as conditional questions for institutions to assess rather than as empirical findings.

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1. Introduction

Higher education has long been an important channel of engagement between the United States and China. Following the normalization of diplomatic relations in 1979, student mobility, scholar exchanges, research collaboration, and institutional partnerships expanded substantially, creating extensive academic and institutional ties between the two countries. By 2015/16, China had become the largest source of international students in the United States, accounting for 328,547 students, or 31.5% of the total international student population (Institute of

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International Education, 2016). These ties have made international students and scholars a significant component of U.S. higher education (John et al., 2021), and internationalization, understood as the integration of an international dimension into the purposes and functions of higher education (Knight, 2004), is increasingly shaped by geopolitical pressures (de Wit & Altbach, 2021).

This relationship began to change significantly as U.S.–China strategic competition intensified. The 2017 U.S. National Security Strategy characterized China as a "revisionist power" seeking to challenge U.S. power, influence, and interests (The White House, 2017). Since then, concerns about foreign influence, intellectual property, technology transfer, and research security have increasingly shaped the U.S. policy environment surrounding international academic engagement. In 2020, the U.S. Presidential Proclamation 10043 suspended the entry of certain Chinese nationals seeking F or J visas (Trump, 2020), and later measures extended to research security and institutional partnerships.

These concerns have affected students and researchers, the conditions of research cooperation, and China-linked educational programs (see Section 3). These developments do not, however, necessarily indicate a complete disengagement from China.

In this article, selective restriction refers to measures that limit entry, funding, or participation for specific categories of persons, projects, or institutions. Conditional engagement refers to the continuation of exchange and cooperation subject to screening, disclosure, and risk-management conditions.

Existing studies tend to examine individual measures—such as the China Initiative (Lewis, 2021) or visa restrictions—or their effects on scientific collaboration (Geng et al., 2025; Lee & Haupt, 2020; Tang et al., 2021; Xie et al., 2023; Zha & Wang, 2025). Policy reports, in turn, recommend institutional risk management within particular domains (JASON, 2019; NASEM, 2022, 2023). Less attention has been paid to how different policy instruments, taken together, reallocate responsibilities for managing international risk to higher-education institutions. This is a question of higher-education governance and institutional management, which is the focus of this article. Section 2 reviews this literature and specifies the gap.

This article analyzes how U.S. federal policy since 2017 has reshaped the governance of higher-education internationalization with China, focusing on the responsibilities that policy instruments place on universities, researchers, and institutional partnerships. It addresses three questions. RQ1. What policy instruments have U.S. federal authorities used since 2017 to govern student and researcher mobility, academic and research cooperation, and China-linked educational organizations and partnerships? RQ2. How do these instruments allocate responsibilities for risk assessment, disclosure, and oversight to higher-education institutions and researchers? RQ3. What conditional implications might this pattern hold for higher-education institutions in Vietnam?

This article makes three contributions. First, it synthesizes U.S. policy instruments across three domains—mobility, research cooperation, and institutional partnerships—that are usually studied separately. Second, it interprets these instruments as a mode of higher-education governance in which risk assessment, disclosure, and oversight are increasingly allocated to universities and researchers. Third, it identifies conditional questions that this pattern raises for higher-education institutions in Vietnam, without claiming empirical findings about them. The article does not propose a new formal theory.

Section 2 reviews the literature and identifies the research gap. Section 3 describes the methodology. Section 4 presents the findings by policy domain. Section 5 discusses the governance implications and the limits of the evidence. Section 6 sets out conditional implications for Vietnam, and Section 7 concludes.

2. Literature Review

2.1. Internationalization and U.S.–China academic relations

Internationalization is commonly defined as the process of integrating an international, intercultural, or global dimension into the purpose, functions, and delivery of post-secondary education (Knight, 2004). Knight (2004) also distinguishes political, economic, academic, and social–cultural rationales for internationalization at national and institutional levels. This distinction is useful for interpreting policy change: when security concerns gain weight, the conditions under which institutions pursue academic and economic rationales are altered, even if internationalization itself continues. de Wit and Altbach (2021) similarly note that internationalization is being reshaped by nationalist-populist political developments, among other pressures, which makes its geopolitical context more visible than in earlier, more cooperative decades.

U.S.–China higher-education relations illustrate this shift. By 2015/16, China had become the largest source of international students in the United States (Institute of International Education, 2016). Bound et al. (2021) show that international students have become a significant component of the U.S. postsecondary system, particularly in graduate and STEM programs and in institutional finances. Academic ties with China therefore created mutual dependencies, which means that later policy adjustments affect institutions' enrollment, research, and partnership planning and not only intergovernmental relations.

2.2. Research collaboration under geopolitical tension

Research on U.S.–China collaboration emphasizes both its scale and its vulnerability. Lee and Haupt (2020), analyzing U.S.–China co-publications in science and engineering for 2014–2018, found that U.S. research output would have been lower without Chinese co-authorship and concluded that, even from a zero-sum nation-state perspective, the United States had more to lose than to gain from cutting ties. Marginson (2022) offers a broader frame, identifying four competing narratives of global science: an expanding cross-border network, an arms race between nations, a global market of competing universities, and a center–periphery hierarchy. He argues that each captures part of the picture but none is sufficient. Read against this frame, security-oriented policy corresponds most closely to the arms-race narrative, whereas evidence of interdependent collaboration corresponds to the network narrative; this correspondence is an interpretation offered here, not a claim made by Marginson.

A second strand examines the China Initiative and its consequences. Lewis (2021) argues that using "China" as the organizing frame for prosecutions created an overinclusive conception of the threat and a form of "threat by association," and recommends a country-neutral framing. Geng et al. (2025) report that the initiative reduced U.S.–China academic collaboration and displaced China's collaboration toward other advanced economies. Xie et al. (2023) document fear and anxiety among Chinese-American scientists, and Tang et al. (2021) warn of collateral damage from decoupling in science and education beyond the bilateral relationship. Zha and Wang (2025) place U.S. developments in a comparative North American–European perspective and identify a stronger tendency toward decoupling in North America. Collectively, this strand concerns one enforcement program and its effects, and it says little about the routine disclosure regime that followed.

2.3. Research security and risk-based governance

Policy and advisory literature frames research security as a problem of risk management under conditions of openness. The U.S. Government Accountability Office (GAO, 2020) found that federal research agencies needed stronger policies to identify and manage foreign-influence risks, including disclosure of foreign financial and non-financial interests, while stressing the need to preserve an open research environment. JASON (2019) likewise emphasized the importance of openness in fundamental research and the role of transparency about researchers' external commitments. The National Academies of Sciences, Engineering, and Medicine (NASEM, 2022) recommend risk management based on threat identification and the designation of research environments suited to particular activities, rather than blanket controls. NSPM-33 (The White House, 2021) and its implementation guidance (National

Science Technology Council, 2022) later standardized disclosure of current and pending support, foreign affiliations, and participation in foreign government-sponsored talent recruitment programs.

This body of work is largely prescriptive. It specifies what agencies and institutions should do but gives less attention to how the resulting obligations are distributed among applicants, researchers, and university administrative units, or how they connect to measures in other domains such as visa screening or foreign-funded programs.

2.4. Institutional governance and China-linked partnerships

The governance of China-linked educational organizations has been examined mainly through Confucius Institutes. GAO (2019) reported that agreements and funding arrangements for selected U.S. schools were often not publicly available, which raises transparency concerns for institutional oversight. Hubbert (2019), in an ethnographic study, situates Confucius Institutes within debates on soft power and globalization and cautions against treating them as uniform, which supports case-specific assessment. NASEM (2023) extends the discussion to foreign-funded language and culture institutes generally and recommends institutional processes for assessing and mitigating risk instead of categorical exclusion. At the statutory level, Section 1062 of the FY2021 National Defense Authorization Act conditions Department of Defense funding on institutional decisions about hosting Confucius Institutes (William (Mac), 2021). Taken together, these sources suggest a shift from the question of whether to host such programs toward the question of how to govern them, through due diligence and disclosure.

2.5. Research gap and contribution

Three limitations in the existing literature motivate this study. First, scholarship on the China Initiative, visa policy, and Confucius Institutes tends to treat each instrument separately, so the cumulative pattern across mobility, research cooperation, and institutional partnerships is not visible. Second, empirical studies of unintended consequences mainly address one enforcement program (Geng et al., 2025; Xie et al., 2023) and cannot show how routine disclosure and due-diligence requirements operate as governance. Third, policy reports recommend institutional risk management within particular domains (GAO, 2019; JASON, 2019; NASEM, 2022, 2023) but do not compare how different instruments assign responsibility for risk assessment to universities and researchers. Work on internationalization, meanwhile, has largely been conceptualized in general terms (de Wit & Altbach, 2021; Knight, 2004), with less attention to how security-oriented policy is translated into institutional functions.

This article addresses these limitations through a qualitative documentary analysis of U.S. federal instruments across three domains, coding each for the party on whom the obligation falls and the responsibility it implies for institutional governance. Its contribution is analytical rather than theoretical: it does not propose a formal theory and does not observe implementation. It offers a cross-domain synthesis that can ground institution-level research and, for Vietnam, raises conditional questions rather than empirical findings.

3. Methodology

3.1. Research design

The study adopts a qualitative documentary research design. Its conclusions therefore concern the content and design of policy instruments, not their implementation within individual institutions. Documentary analysis is appropriate because the object of study is the content, scope, and institutional logic of public policy instruments rather than the behavior of individuals or institutions. The study involved no interviews, surveys, or original quantitative analysis.

3.2. Document corpus and inclusion criteria

Table 1

Document corpus by source type

Source type	Documents	Role in the analysis
Legal and policy documents (7)	Proclamation 10043 (Trump, 2020); NSPM-33 (The White House, 2021); NSPM-33 implementation guidance (National Science and Technology Council, 2022); William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (2021); National Security Strategy (The White House, 2017); announcement on screening and vetting (U.S. Department of State, 2026); China Initiative materials (U.S. Department of Justice, 2021)	Primary evidence on instruments, scope, and obligations.
Oversight and advisory reports (2)	U.S. Government Accountability Office (2020); National Academies of Sciences, Engineering, and Medicine (2023)	Evidence on identified gaps, risks, and recommended institutional practices.
Peer-reviewed studies (4)	Geng et al. (2025); Tang et al. (2021); Xie et al. (2023); Zha & Wang (2025)	Documented effects and scholarly interpretation.
Statistical report (1)	Institute of International Education (2016)	Baseline for mobility context.

The corpus comprises 14 sources, listed by type in Table 1. Sources were included if they (a) were issued or published between 2017 and 2026, with one earlier statistical report used as a baseline; (b) addressed student and researcher mobility, academic and research cooperation, or China-linked educational organizations and partnerships; (c) were issued by a U.S. federal authority or authoritative advisory body, or published in a peer-reviewed journal; and (d) were publicly accessible. Media commentary, opinion pieces, and documents without an identifiable issuing authority were excluded. The corpus is purposive rather than exhaustive. The 14 sources in Table 1 constitute the analytical corpus that was read and coded. Additional scholarly sources cited in Sections 1, 2, and 5 provide conceptual and empirical context and were not coded as policy instruments.

3.3. Analytical procedure

The analysis proceeded in four steps. First, each document was read in full and its provisions relevant to the three policy domains were identified. Second, each policy instrument was coded. Each instrument was coded for (a) policy domain, (b) type of instrument (entry restriction, disclosure requirement, funding condition, or institutional oversight), (c) the party on whom the obligation falls, and (d) the responsibility this implies for institutional governance. Third, instruments were compared across periods and administrations to distinguish continuity from change. Fourth, the resulting patterns were checked against the peer-reviewed literature, and stated policy aims, documented effects, and the authors' interpretation were reported separately. The coding scheme is an analytical device for documentary analysis and is not presented as a formal theory.

3.4. Limiting selection bias and limitations

To limit selection bias, the corpus combines four source types (legal and policy documents, oversight and advisory reports, peer-reviewed studies, and statistical reports); stated policy aims, documented effects, and the authors' interpretation are reported separately; and the corpus is acknowledged as selective rather than exhaustive. In addition, primary documents were preferred to secondary descriptions where available, and the full corpus is listed in Table 1 so that readers can assess the selection. Limitations remain. Official U.S. sources predominate, the study

includes no interviews or institutional implementation data, and policy developments in 2025–2026 are ongoing and may change.

4. Findings

4.1. Background and continuity

The post-2017 adjustment of U.S. education policy toward China should be understood within the broader transformation of U.S.–China relations from engagement toward strategic competition. As geopolitical tensions intensified, higher education and research increasingly became connected to concerns over foreign influence, technology transfer, intellectual property, and national security (GAO, 2020; Zha & Wang, 2025). Consequently, educational and research relations with China were no longer assessed solely in terms of their academic and diplomatic benefits but increasingly through a risk-management perspective.

The U.S. Government Accountability Office (GAO) reported in 2020 that federal research agencies needed stronger policies to identify and manage risks associated with foreign influence, including requirements for researchers to disclose foreign financial and non-financial interests, while emphasizing the need to maintain an open research environment (GAO, 2020). National Security Presidential Memorandum-33 (NSPM-33), issued in January 2021, directed federal agencies to strengthen protections for for government-supported research and development against foreign government interference and exploitation (The White House, 2021). Its implementation guidance, issued by the National Science and Technology Council in January 2022 under the Biden administration, introduced more standardized disclosure requirements concerning current and pending support, foreign affiliations, and participation in foreign government-sponsored talent recruitment programs (National Science Technology Council, 2022).

This development is important because it shows that the policy adjustment was not limited to China-specific restrictions. Rather, China-related concerns became embedded within a broader U.S. framework governing foreign influence and research security. The resulting policy environment combined the preservation of international scientific cooperation with greater requirements for transparency, disclosure, institutional oversight, and risk assessment. The following subsections examine three domains of adjustment.

4.2. Student, and researcher mobility.

The first major area of adjustment concerns the movement of students, scholars, and researchers between China and the United States. Following the intensification of strategic competition, U.S. policy increasingly differentiated among categories of international researchers according to their institutional affiliations, fields of activity, and potential security implications.

A prominent example was Presidential Proclamation 10043, issued in May 2020. The proclamation suspended the entry of certain Chinese nationals seeking F or J visas whose activities were considered connected to entities associated with China's military-civil fusion strategy (Trump, 2020). Importantly, the measure was not a blanket restriction on all Chinese students and researchers. Its application depended on specified institutional and research-related conditions, illustrating the selective character of the policy intervention.

The screening and vetting of international visa applicants subsequently became an increasingly important component of U.S. policy. In March 2026, the Department of State announced an expansion of online-presence review to additional nonimmigrant visa categories, while F, M, and J student and exchange-visitor applicants were already subject to such review. The Department stated that visa screening and vetting were intended to identify applicants who may be inadmissible on national-security or public-safety grounds (U. S. Department of State, 2026).

The development from Proclamation 10043 to expanded screening and vetting indicates a broader trend toward incorporating national-security considerations into the governance of international educational mobility. However, because these measures apply differently across visa categories and applicant profiles, they should be interpreted as

mechanisms of selective screening rather than evidence of a general prohibition on educational mobility between the two countries.

For institutions, entry restrictions and expanded vetting shift part of the uncertainty of student and researcher mobility to admissions offices, international offices, and academic units, which must plan for variable visa outcomes. This is an inference from policy design; the corpus contains no data on institutional practice or on mobility flows. Over the period, the instrument shifted from a category-specific entry restriction (2020) to broader screening and vetting of visa applicants (2026).

4.3. Academic and research collaboration.

The second area concerns academic and research cooperation. U.S. policy has increasingly emphasized disclosure, transparency, and institutional responsibility in federally funded research involving foreign partners.

GAO identified weaknesses in federal agencies' policies concerning foreign financial interests and non-financial conflicts, including researchers' multiple professional appointments and other external relationships (GAO, 2020). These concerns subsequently became part of the broader research-security framework under NSPM-33. Under the implementation guidance, disclosure requirements cover current and pending support and other resources available to researchers, including certain foreign-provided resources and affiliations (National Science Technology Council, 2022).

The policy shift therefore does not amount simply to a reduction in international research collaboration. Instead, it changes the conditions under which collaboration is conducted. Institutions and researchers are increasingly expected to demonstrate transparency concerning external support, affiliations, appointments, and potential conflicts of interest. This approach is consistent with the National Academies' recommendation that U.S. higher education institutions adopt systematic processes for assessing and managing risks associated with foreign-funded language and culture institutes and other international partnerships (NASEM, 2023). The National Academies explicitly frames these risks as manageable rather than automatically requiring the elimination of such partnerships.

Evidence on how such scrutiny has affected collaboration is discussed in Section 4.4. For institutions, disclosure requirements make research offices responsible for collecting, verifying, and managing information on foreign support and affiliations (National Science Technology Council, 2022; The White House, 2021). Whether and how universities have operationalized these requirements is not documented in the corpus. Across administrations, the strategic objective of managing foreign influence persisted, while the instrument shifted from enforcement-oriented measures to disclosure and institutional oversight (see Section 4.3).

4.4. China-linked educational organizations and partnerships

The third area concerns educational organizations and programs with links to China, particularly Confucius Institutes and other foreign-funded language and culture institutes.

Section 1062 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 introduced restrictions concerning Department of Defense funding for institutions hosting Confucius Institutes, subject to specified waiver conditions (William (Mac), 2021). The measure illustrates a policy mechanism in which federal funding is used to influence institutional decisions concerning foreign-funded educational programs.

The issue has subsequently been considered within a broader framework. The National Academies' 2023 consensus study examined foreign-funded language and culture institutes beyond Confucius Institutes and emphasized that such programs can provide educational and cultural benefits while also presenting potential risks relating to academic freedom, governance, freedom of expression, and national security. The report recommends institutional processes for assessing and managing these risks rather than treating all foreign-funded institutes as inherently unacceptable (NASEM, 2023).

For institutions, funding conditions and the recommendations of the National Academies (2023) place responsibility on universities to assess, document, and mitigate the risks of foreign-funded programs through due diligence and governance processes, rather than to treat all such programs as inherently unacceptable. Over time, funding conditions on institutions hosting Confucius Institutes (2021) were followed by an advisory approach centered on institutional risk assessment (2023).

5. Discussion

5.1. Conditional engagement as a governance mode

Across the three domains, U.S. policy does not close higher-education cooperation with China; it conditions it. Selective restriction operates where specific categories of persons, funding, or programs are judged to carry security risk, for example through entry restrictions under Proclamation 10043 or funding conditions affecting institutions that host Confucius Institutes. Conditional engagement operates elsewhere: cooperation continues, but access to federal funding and partnerships depends on disclosure, screening, and institutional risk management. The two modes are complementary, and the documents in the corpus do not indicate a policy of complete decoupling. This reading is consistent with Marginson's (2022) argument that no single narrative, whether cross-border networking or national competition, fully explains global science: in the documents examined here, security-oriented instruments coexist with continued, conditioned cooperation. In terms of Knight's (2004) rationales, security considerations have gained weight alongside, rather than in place of, academic and economic rationales. The term "decoupling" is therefore used here only in the sense of the literature, which has described a stronger tendency toward decoupling or "de-Chinaization" in North American higher-education policy " (Zha & Wang, 2025).

5.2. How instruments allocate responsibilities to institutions

Table 2 shows that each domain places obligations on different parties. In mobility, the obligation falls primarily on applicants, and institutions bear the planning consequences. In research cooperation, disclosure and oversight requirements make universities responsible for collecting, verifying, and managing information on foreign support and affiliations. In institutional partnerships, funding conditions and advisory recommendations make universities responsible for assessing and mitigating the risks of foreign-funded programs, including documenting agreements and funding arrangements, an area where GAO (2019) found gaps at selected U.S. schools, and assessing programs case by case rather than as a uniform category (Hubbert, 2019). In organizational terms, these obligations fall on admissions and international offices (mobility), research administration and compliance offices (disclosure and oversight), and the units that negotiate and govern partnerships (due diligence). The common pattern is a shift from case-by-case enforcement toward institutional risk management, in which risk assessment has become an additional dimension of internationalization policy and universities become intermediaries of national-security policy. This reading is an inference from policy design; the corpus does not show how individual universities have implemented these requirements.

Table 2

Policy domains, instruments, obligations, and institutional implications

Domain	Main instruments	Obligation falls on	Institutional implication	Pattern over time	Consequences reported in the corpus
Mobility	Proclamation 10043 (Trump, 2020); expanded screening and vetting (U.S.	Applicants; institutions bear planning consequences	Admissions and international-office planning under variable visa outcomes	Change: from category-specific entry restriction (2020) to broader	Not assessed in the corpus

	Department of State, 2026)			screening and vetting (2026)	
Research cooperation	NSPM-33 and implementation guidance (The White House, 2021; National Science and Technology Council, 2022); GAO (2020)	Researchers And institutions	Disclosure procedures, conflict-of-interest management, research-security programs	Continuity of objective; instrument shifts from enforcement (China Initiative) to disclosure and oversight	Reduced collaboration and displacement effects (Geng et al., 2025); fear and return migration among scientists of Chinese descent (Xie et al., 2023)
Institutions and programs	NDAA FY2021 funding restrictions on institutions hosting Confucius Institutes (2021); NASEM (2023)	Institutions	Due diligence and risk assessment for foreign-funded programs	Funding conditions (2021) followed by advisory risk-management approach (2023)	Concerns about academic freedom, governance, and self-censorship (NASEM, 2023)

5.3. Continuity and institutionalization

The China Initiative was announced in November 2018 and formally ended in February 2022 (U. S. Department of Justice, 2021). Its end did not restore the pre-2017 policy environment: the broader research-security framework developed through NSPM-33 and its implementation guidance remained in place and continued to develop (National Science Technology Council, 2022; The White House, 2021). This pattern is consistent with Lewis's (2021) critique of "China"-centered framing, since NSPM-33 addresses foreign government interference generally rather than a single country (The White House, 2021). This suggests continuity of strategic objectives with adjustment of instruments, from enforcement-oriented measures toward disclosure requirements and institutional risk management. When concerns about foreign influence are incorporated into grant administration, disclosure requirements, and university compliance systems, they become embedded in the routine governance of the research system, which may make the trajectory more durable than any single enforcement program.

5.4. Unintended consequences and the limits of the evidence

Evidence on unintended consequences should be interpreted with care. Geng et al. (2025), using a difference-in-differences approach covering 2016–2022, report that the China Initiative reduced U.S.–China academic collaboration and generated displacement effects on China's collaboration with other advanced economies, including in fields without clear national-security connections. Such designs measure collaboration through observable research outputs, so they capture realized collaboration rather than researchers' motives, and they concern one enforcement program rather than research-security policy as a whole. Xie et al. (2023) report fear and anxiety among surveyed scientists of Chinese descent in the United States and rising return migration, which points in the same direction from a different angle; that evidence, too, concerns the climate created by investigations rather than disclosure rules as such. These findings should be read alongside evidence that collaboration has been mutually beneficial: Lee and Haupt (2020) found that U.S. output in the fields they studied depended on Chinese co-authorship. Because their data cover 2014–2018 and therefore largely precede the measures examined here, they indicate what is at stake rather than the effect of any specific instrument.

Taken together, these studies suggest a plausible chilling effect, but they do not show that disclosure and screening requirements as such reduce collaboration, and they do not weigh such costs against the security benefits the policies seek to protect. Tang et al. (2021) similarly argue that decoupling pressures in science and education may have collateral consequences beyond the bilateral relationship.

Three tensions follow for institutional governance. The first concerns proportionality: risk-based review must distinguish areas of genuine security concern from ordinary scholarly exchange, a concern that reports emphasizing the openness of fundamental research also raise (JASON, 2019; NASEM, 2022). The second concerns capacity: compliance and due-diligence functions impose costs that institutions with fewer administrative resources may find harder to bear. The third concerns academic freedom and openness: the National Academies (2023) stress that risk management should not treat all foreign-funded programs as inherently unacceptable. These tensions are inferences from the documents and are not measured in the corpus. The effectiveness of education policy toward China should therefore be evaluated not only by the extent to which it reduces potential foreign influence but also by whether it preserves legitimate academic mobility, scientific collaboration, academic freedom, and the international circulation of knowledge. Its long-term effectiveness will depend on whether research-security measures can remain targeted to genuine risks while avoiding unnecessary restrictions on legitimate academic exchange.

5.5. Contribution to higher-education governance research

This article does not propose a new formal theory. Its contribution is analytical and responds to the gap identified in Section 2.5. Existing studies examine individual measures (Lewis, 2021), their effects on collaboration (Geng et al., 2025; Lee & Haupt, 2020; Tang et al., 2021; Xie et al., 2023; Zha & Wang, 2025), or institutional risk management within a single domain (GAO, 2020; NASEM, 2023). Existing studies examine individual measures or their effects on collaboration. By coding instruments across three domains for the party on whom the obligation falls, the present analysis shows a common pattern—selective restriction combined with conditional engagement that transfers risk-management responsibilities to institutions—and provides a basis for institution-level research on how universities operationalize these requirements. Its limits are those of documentary analysis: it cannot show how policies are implemented, experienced, or contested within institutions.

6. Conditional implications for Vietnamese higher education

This study did not collect data on Vietnamese universities and did not analyze Vietnamese policy documents. The following points are therefore analytical inferences from the design of U.S. policy, presented as questions for Vietnamese institutions and policymakers to assess in their own context rather than as empirical findings or recommendations.

First, balance: how can institutions sustain internationalization and mobility while building proportionate mechanisms for transparency about foreign funding and affiliations? Second, proportionality: which research areas, such as dual-use technologies or sensitive data, warrant risk-based review, and how can review avoid constraining collaboration in other fields? Third, capacity: what compliance, due-diligence, and training capacity is needed, and who bears its costs? The U.S. experience suggests that such obligations tend to be shifted to institutions. Fourth, diversification: would a broader portfolio of international partners reduce dependence on any single partner? This is a policy argument rather than a finding of this study.

Answering these questions requires institution-level case studies, interviews, and analysis of Vietnamese policy documents, which lie beyond the scope of this article.

7. Conclusion

This article has analyzed how U.S. federal policy toward China since 2017 has reshaped the governance of higher-education internationalization. Addressing RQ1, the documents show a repertoire of instruments—entry restrictions, disclosure requirements, funding conditions, and institutional oversight—across mobility, research cooperation, and China-linked programs. Addressing RQ2, these instruments increasingly place responsibility for risk assessment, disclosure, and oversight on universities and researchers, a pattern best described as selective restriction combined with conditional engagement rather than complete decoupling. Addressing RQ3, the pattern raises questions of

balance, proportionality, capacity, and diversification for Vietnamese institutions, which this study can pose but not answer.

The article contributes a cross-domain synthesis and an analytical reading of policy instruments as a mode of higher-education governance. For institutional practice, it suggests that risk management is becoming a core function of international offices and research administration; this is an inference from policy design, not an empirical finding. The study has limitations: its corpus is selective and U.S.-centered, it does not observe implementation, the evidence on unintended consequences rests on a small number of studies, and policy developments in 2025–2026 are ongoing.

Future research should include (i) institution-level case studies of how universities operationalize disclosure and due diligence; (ii) comparative analyses of other countries' policies; (iii) empirical studies of effects on student mobility, which the present corpus does not assess; and (iv) Vietnam-specific research on institutional policies and practices.

Declarations

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The authors have no acknowledgements to declare.

Ethical Statement
This study did not involve human participants and therefore did not require institutional ethics approval.

Competing Interests
None.

Author's Contribution
Author[1]: Conceptualization, Formal analysis, Writing – original draft
Author[2]: Writing – review and editing

Data Availability
None.

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