

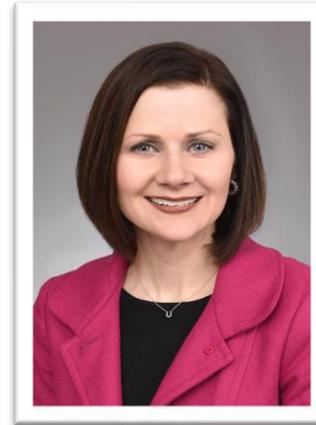
National Science,
Technology, and Secur
ity Roundtable
Meeting

Central Midwest
Research Security
Forum Panel

October 11-12, 2023



Panel members



Holly Bante

University of Cincinnati



Lisa Nichols

University of Michigan



Elizabeth Wagner

Purdue University



Amy Weber

Northwestern University

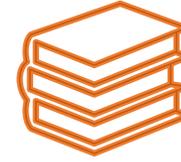
Northwestern University – Ranked 9th Nationally Office for Research



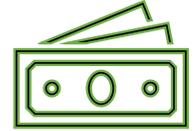
Private Institution



Fundamental Research



8,000 + undergraduates
14,000 + graduate
students



\$1.007 billion
research funding

3,888 research
awards FY2023

VPR

AVP

Conflict of Interest

Export Controls &
International Compliance

IRB

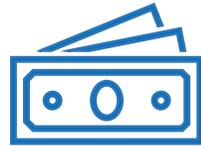
IACUC

Research Safety

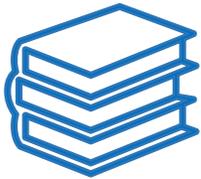
University of Michigan



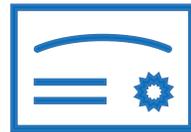
R1 Public University



\$1.71 Billion in Research Expenditures in FY22



52,065 students enrolled, 18,335 graduate students



Among the top institutions in the U.S. and globally, QS World University Rankings



1,954 research awards received in FY22



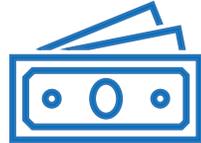
Fundamental, EAR, ITAR, CUI, Facility Clearance



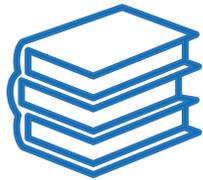
Purdue University



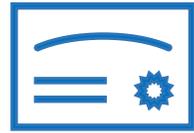
R1 Public University
Land Grant University



\$567M Research
Awards



50,000 Residential
Students,
2/3 STEM



#5 in Nation for
Degrees: Undergrad,
MS, PhD, and Women
Engineers



1,586 Federal
Research Awards,
1,785 Nonfederal
Research Awards



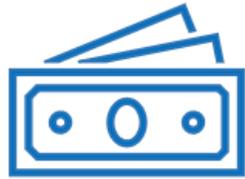
Fundamental, EAR,
ITAR, DoD CUI and
Classified Research



University of Cincinnati Office of Research



R1 Public University
Land Grant University



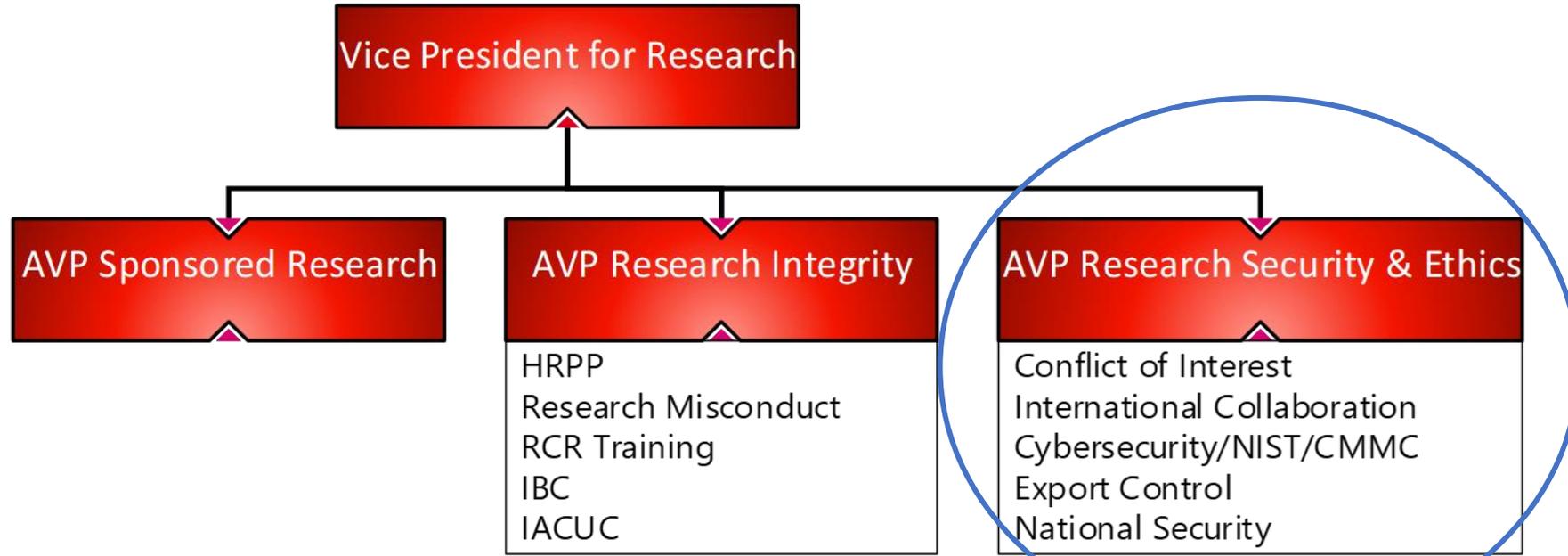
\$615M in Research
Expenditures



Fundamental, EAR,
ITAR, and DoD CUI
Research



Enrollment at 48,000
students



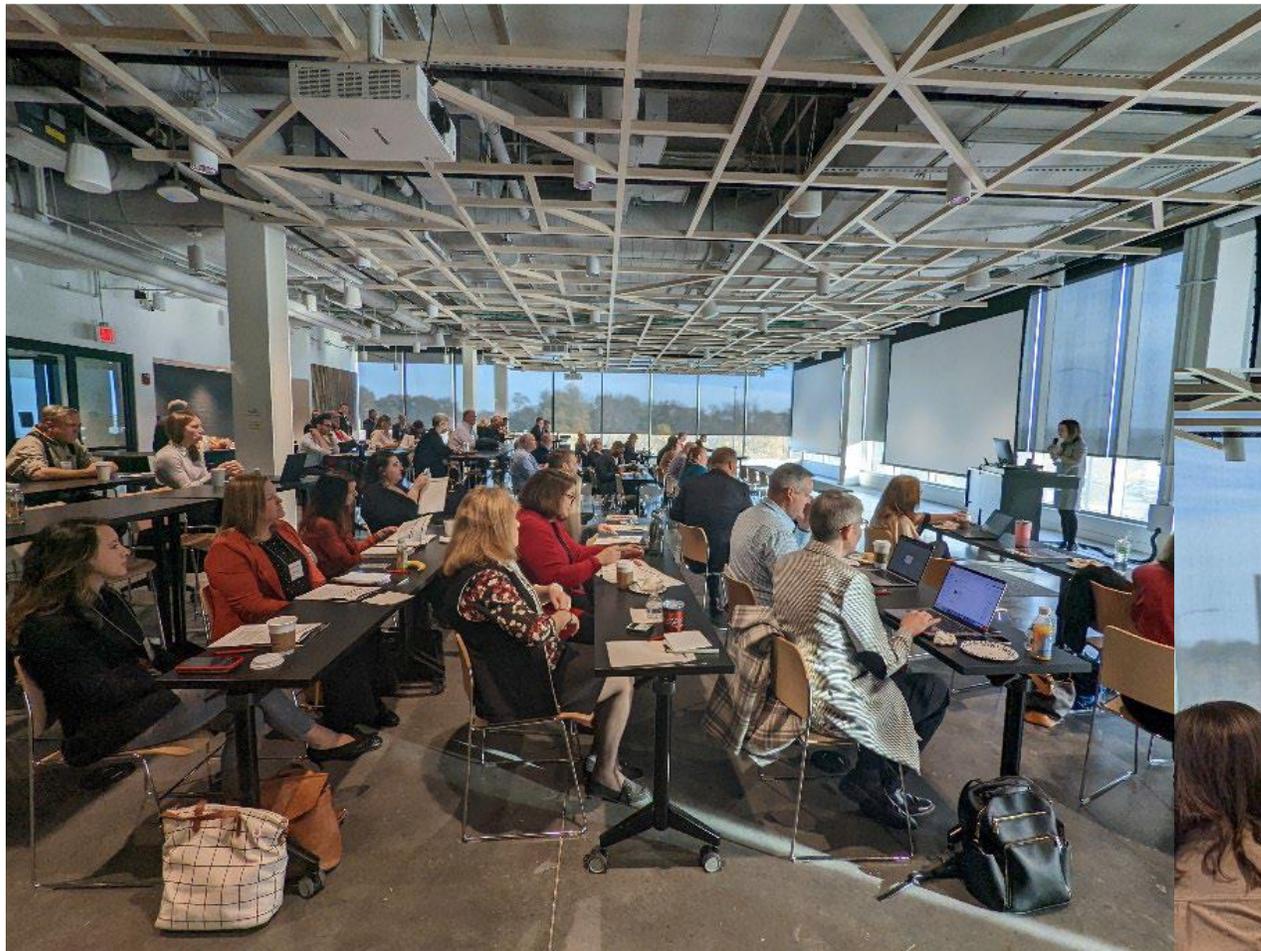
Forum Beginnings: Regional Research Security Conference

University of Cincinnati
October 28, 2022

- Collaborative effort with 7 local universities
- Research Security Speakers:
 - Dr. Rebecca Keiser, NSF
 - Carl Taylor, University of Kansas
 - Dr. Kevin Gamache, Texas A&M
- Nearly 60 attendees from 19 academic institutions, to include USC, UTSW and Georgetown University



Regional Research Security Conference, 2022



Significant takeaways:

1. Share institutional policies, procedures, training
2. Network
3. Be inclusive

How do we continue the conversation?

Mission Statement

The Central Midwest Research Security Forum aims to establish an inclusive and supportive environment for research security professionals to establish best practices to protect our academic values while meeting federal regulatory requirements.

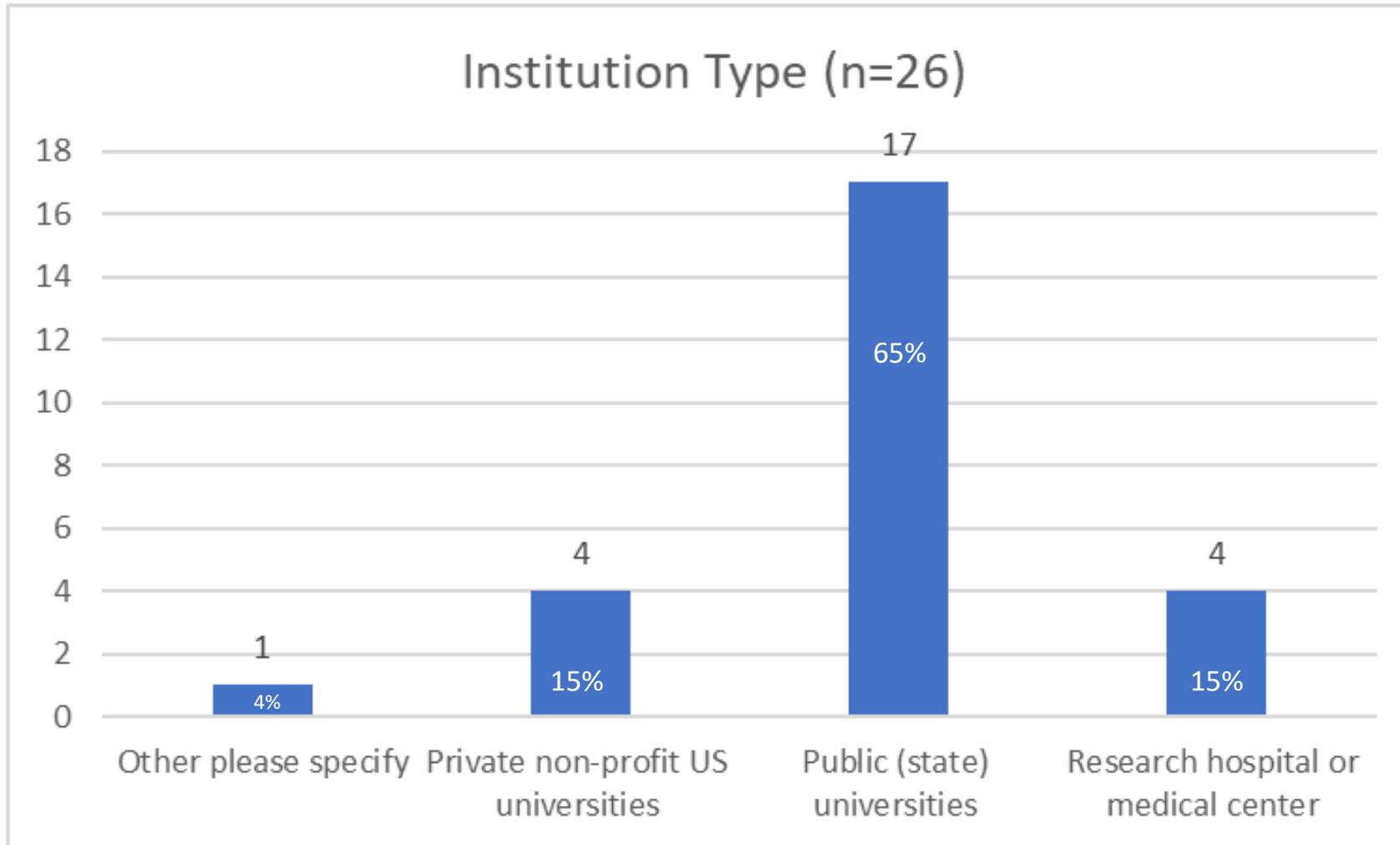
Cincinnati Children's Hospital Medical Center	Northwestern University	University of Louisville
Miami University	The Ohio State University	University of Michigan
Ohio University	University of Dayton	University of Toledo
University of Cincinnati	University of Illinois at Urbana-Champaign	Wright State University
University of Wisconsin – Madison	University of Missouri	University of Pittsburgh
University of Illinois Chicago	Nationwide Children's Hospital	Michigan State University
Cleveland Clinic	Cincinnati State	Mississippi State University
Northern Illinois University	Central State University	Purdue University
University of Kentucky	University of Minnesota	

Month	Topic(s) and Presenter(s)
December 2022	Kick-Off Meeting – Introductions and By-laws
January 2023	RS Training modules (in-house vs. outsourced); Development of risk matrix for in-house disclosures and reviews Amy Weber (Northwestern)
February 2023	DOD-Army Risk Mitigation Shandra White (Northwestern)
March 2023	Draft RS Program Requirements (NSPM-33, CHIPS+); RS Training Awards from NSF Allen DiPalma (UPitt)
April 2023	Draft RS Program Requirements (NSPM-33, CHIPS+); RS Training Awards from NSF Allen DiPalma (UPitt)
May 2023	International Travel & Concur (reporting) Lauren Schroeder (Texas A&M) - Guest
June 2023	NSF PAPPG 2024 RFI Holly Bante (UC) NSF Engine – Engine Development Award Holly Bante (UC) Kacey Appel (CCHMC)
July 2023	DOE BAA Language Karly Taylor (OSU) Input from Sara Poll (UK), David Mulder (UM) Intergovernmental China funding solicitation Emily Bradford (UK)
August 2023	NASEM Roundtable Updates Amy Weber and Mary Kate Clifford (Northwestern) DOD Memo on Countering Foreign Influence Allen DiPalma (UPitt)
September 2023	Risk Mitigation Process and Experience Mary Millsaps (NC State U) - Guest

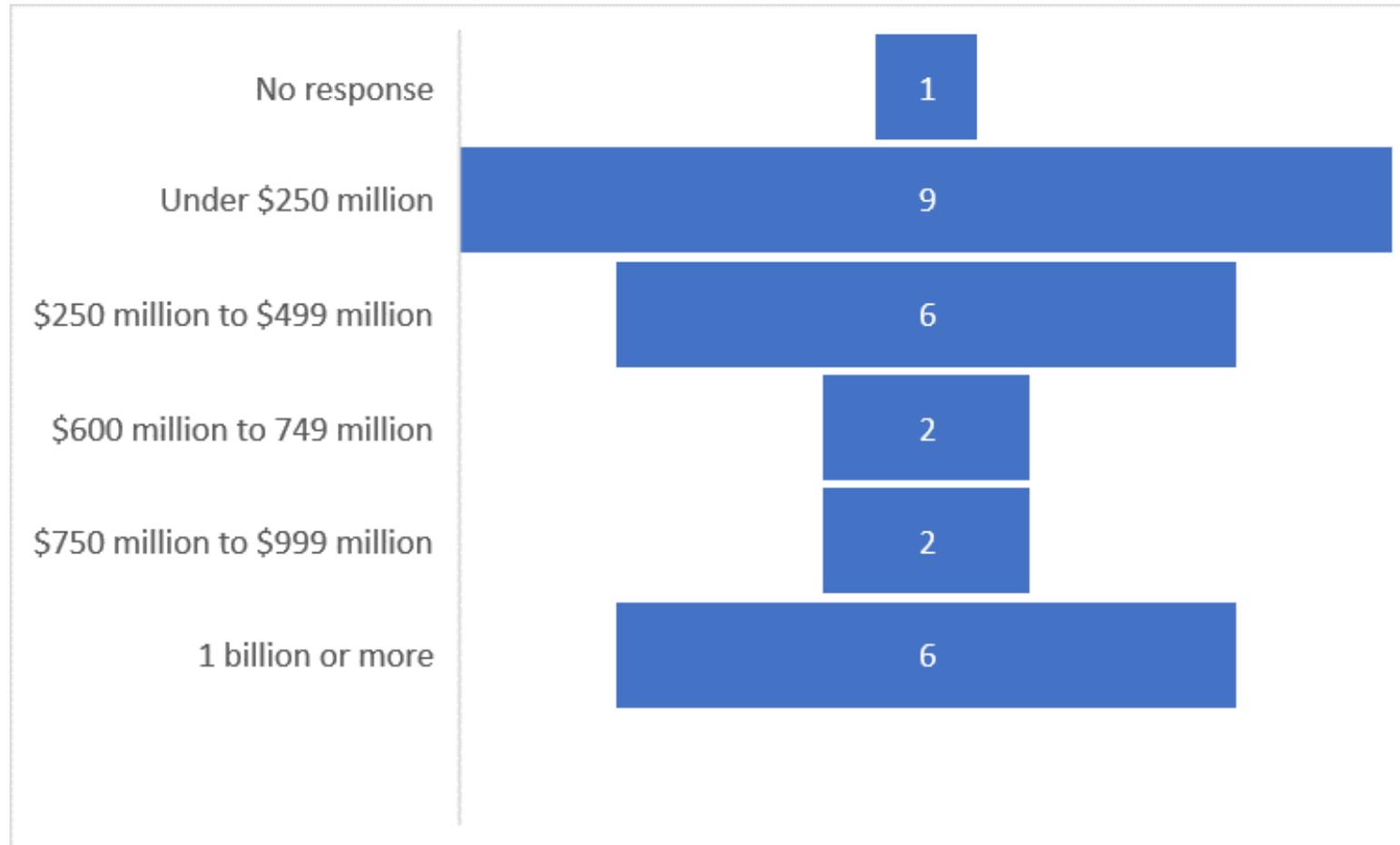
Discussion Guide

- Survey sample: 26 institutions
- Members of the CMRSF
- Voluntary targeted sample
- Individual responses confidential
- Results reported in the aggregate

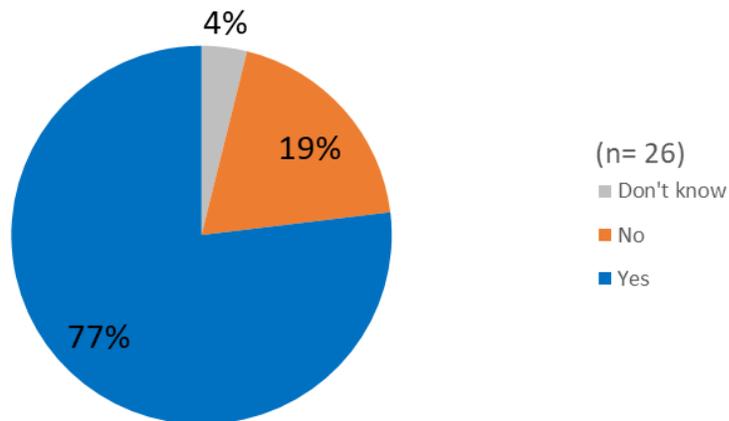
Q. 1 Which best describes your university?



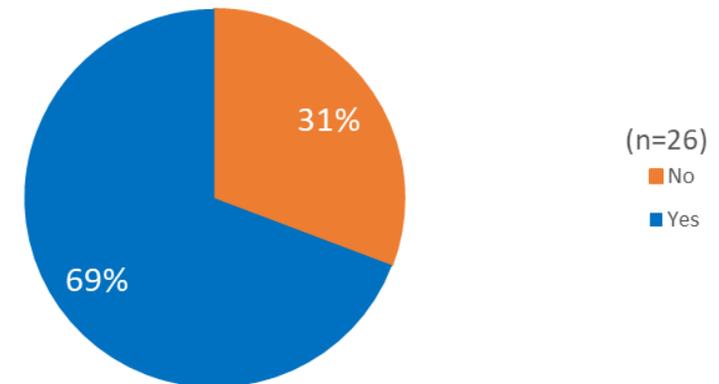
Q. 2 Using the most recently published HERD data, what was your organization's research expenditures (n=26)?



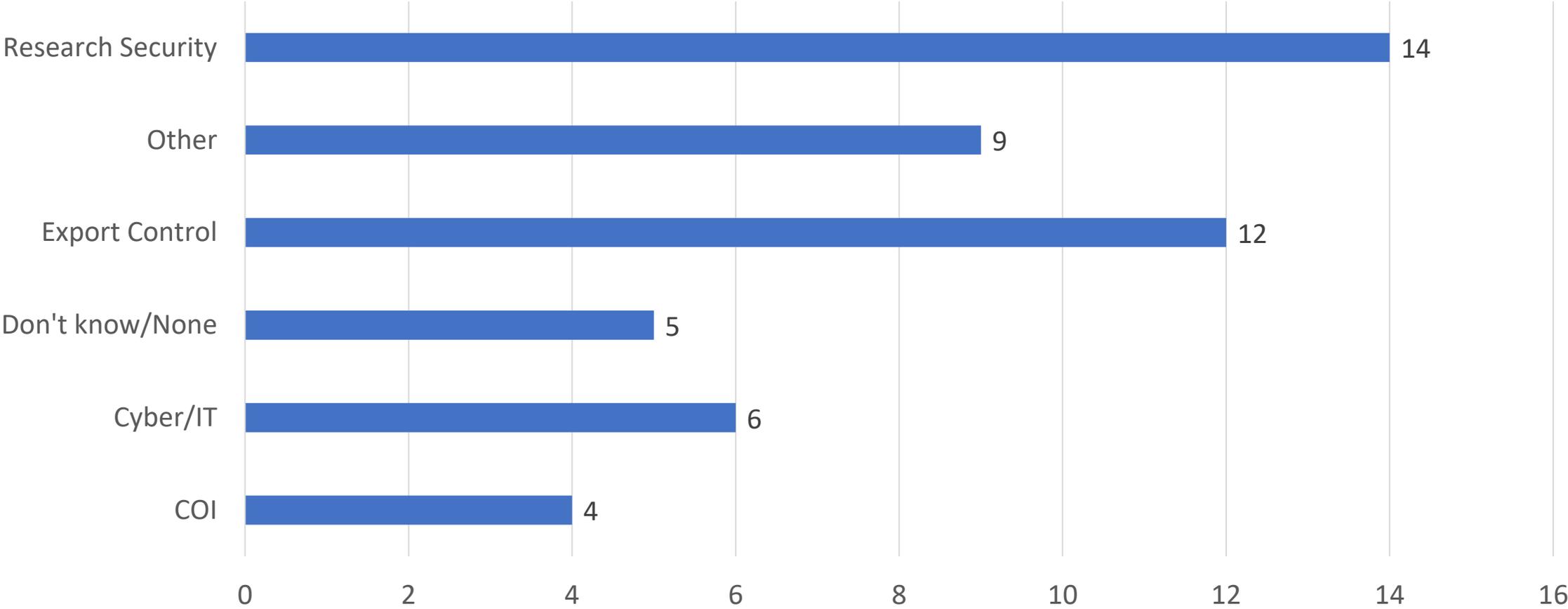
Q. 3 Is your organization required to implement a research security program under NSPM-33?



Q. 4 Has your institution identified a unit or individual to lead the Research Security program mandated by NSPM-33?



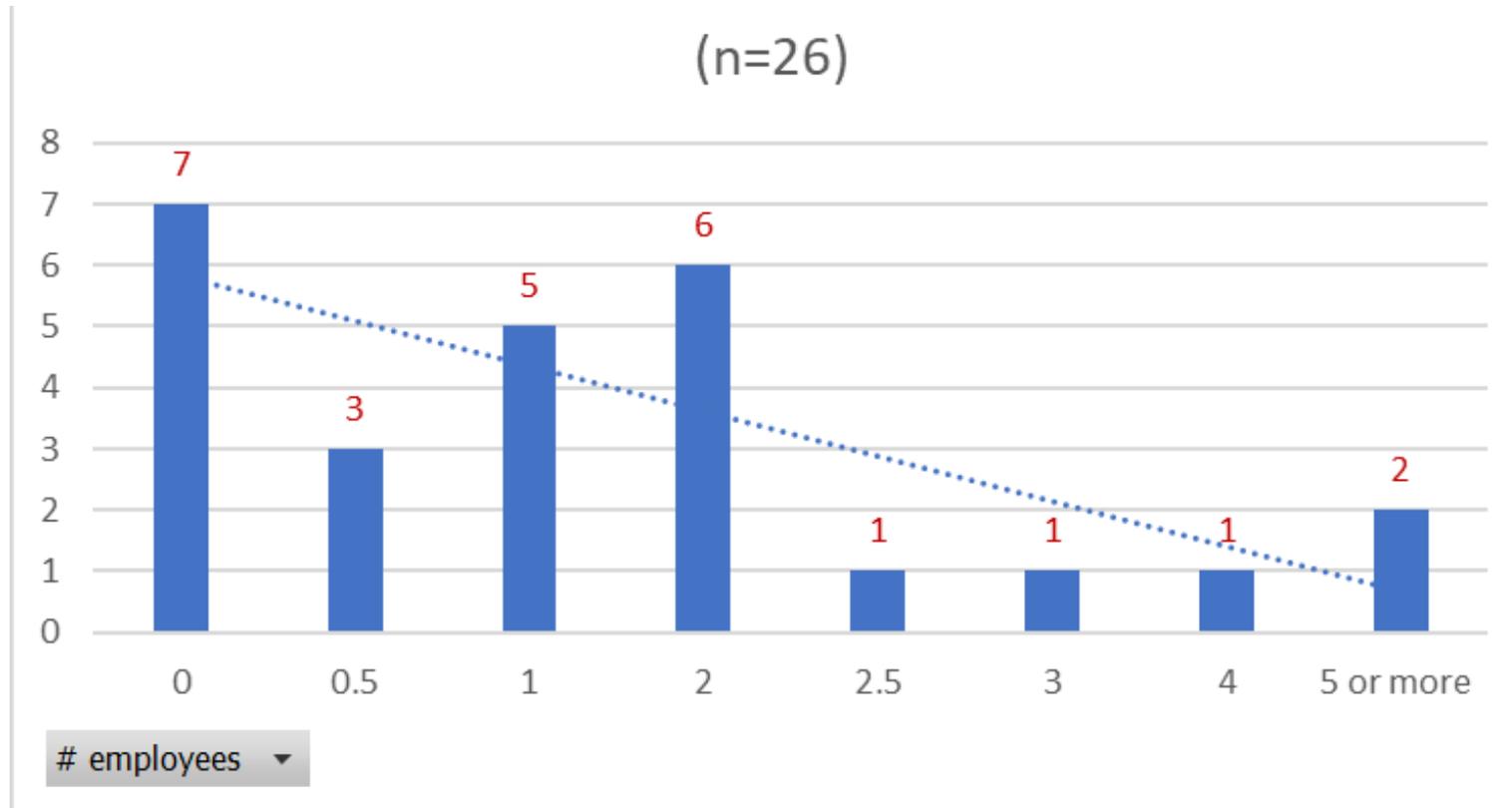
Q. 5 What unit or program is leading the Research Security Program?



Q. 5 What unit or program is leading the Research Security Program?

Unit(s) Leading NSPM-33 Efforts	Count
Research Security	4
Other Specify [Research Integrity (3), VPR (1) Corporate Compliance (1) Governance Board (1)	4
Export Control	3
Don't Know	3
Conflict of Interest, Cyber/IT, Export Control, Research Security	2
Export Control, Research Security, Other please specify	2
Export Control, Research Security	1
Conflict of Interest, Cyber /IT, Export Control , Research Security, Other please specify	1
Conflict of Interest, Export Control, Don't know	1
Cyber/IT, Export Control	1
Cyber/IT, Export Control, Research Security, Other please specify	1
Cyber/IT, Research Security	1
Research Security, None	1
Research Security, Other please specify	1

Q. 6 How many employees do you have officially working on your Research Security team (i.e., people whose job description is research security or assigned to the Research Security program, not people across the university who may tangentially or informally assist in this effort)?



TOP CONCERNS

Q7. What are your institution's top concerns related to implementing NSPM-33 research security program requirements?

#1 Concern: Resources

- Having adequate time and staffing to implement the new requirements, including developing and socializing policies.
- Requires extensive changes in university practices and new systems to track information.
- Broad unfunded mandate with a short timeline to implementation; infrastructure, training, oversight
- Bandwidth; staffing; documentation; ensuring compliance; monitoring; ensuring robust program

"How to take on more administrative requirements in a small institution and keep up with the changing research landscape."

"We are hovering at the threshold and don't have the manpower."

Q7. What are your institution's top concerns related to implementing NSPM-33 research security program requirements?

- **Training:** Meeting the requirements; training burden and fatigue
- **Cybersecurity:** Assessing whether additional cyber requirements are needed; change in culture for researchers conducting fundamental research
- **Foreign Travel Security:** Scope of covered personnel
“Travel reporting and briefings: the scope should be narrowed to reflect risk and benefits. Providing pre & post briefings and equipment for all professional foreign travel will be prohibitively expensive both in overhead cost and FTE.”
- **Flexibility:** Having the flexibility to implement risk-based program and solutions

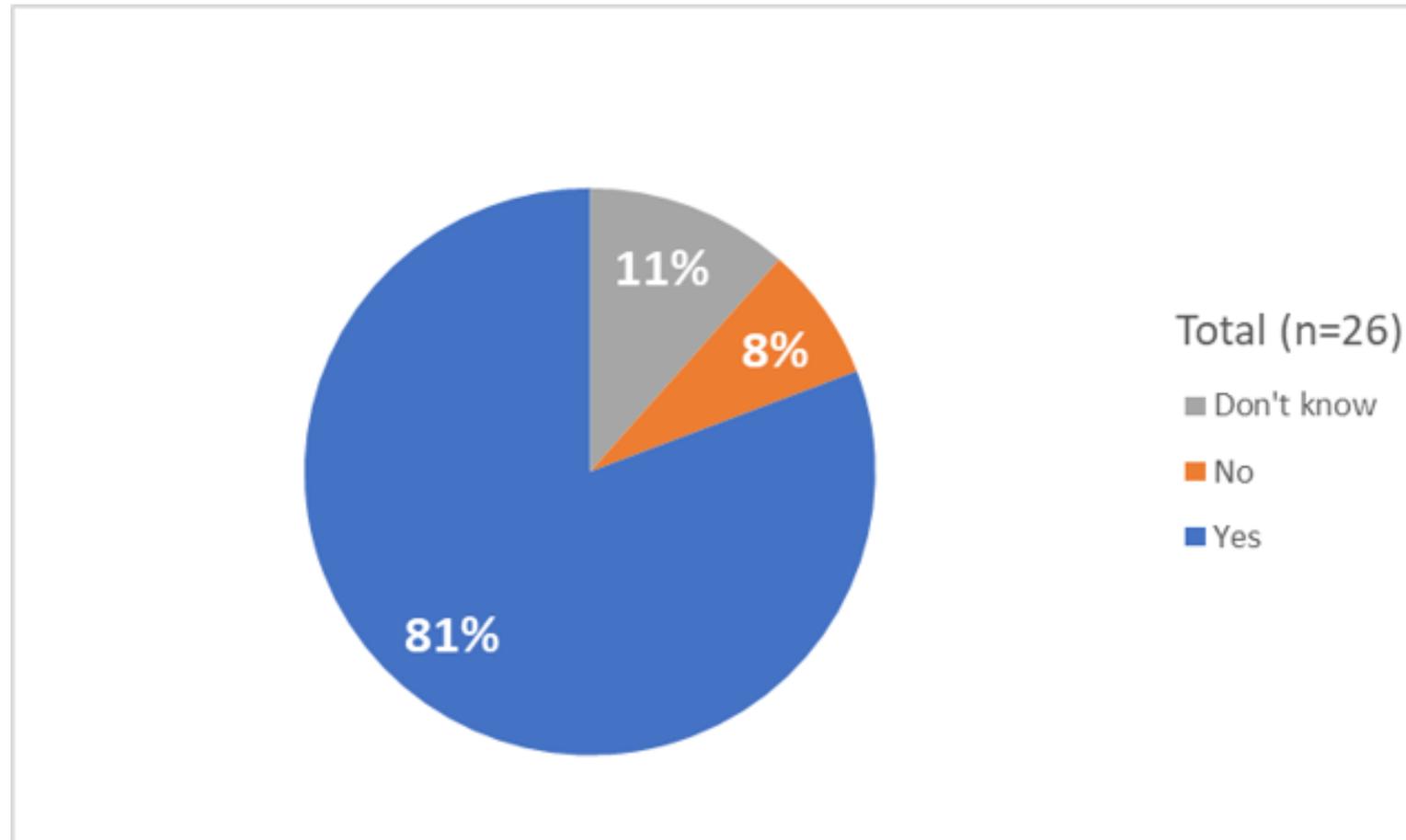
Q7. What are your institution's top concerns related to implementing NSPM-33 research security program requirements?

- **Cross-Institutional Coordination:** Organizing cross campus elements; Coordination with other units (ITS, Global/travel) that have competing priorities; Clear ownership
- **Program Standards:** Consistency and finalization of federal requirements
- **Disclosure:** Lack of consistent disclosure forms/harmonization; Developing a disclosure platform
- **Faculty Awareness:** Educating requirements; Communication and awareness with faculty researchers

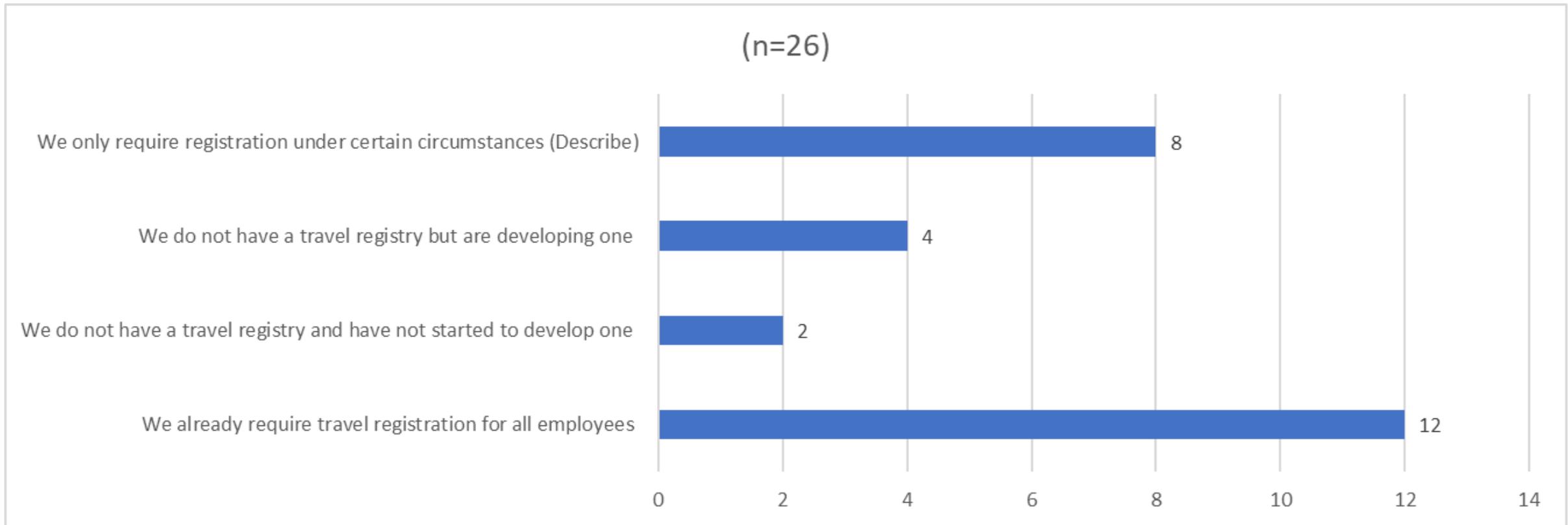
Balancing implementation of a program that increases protections while limiting administrative burden and negative impact on research productivity

International Travel Security

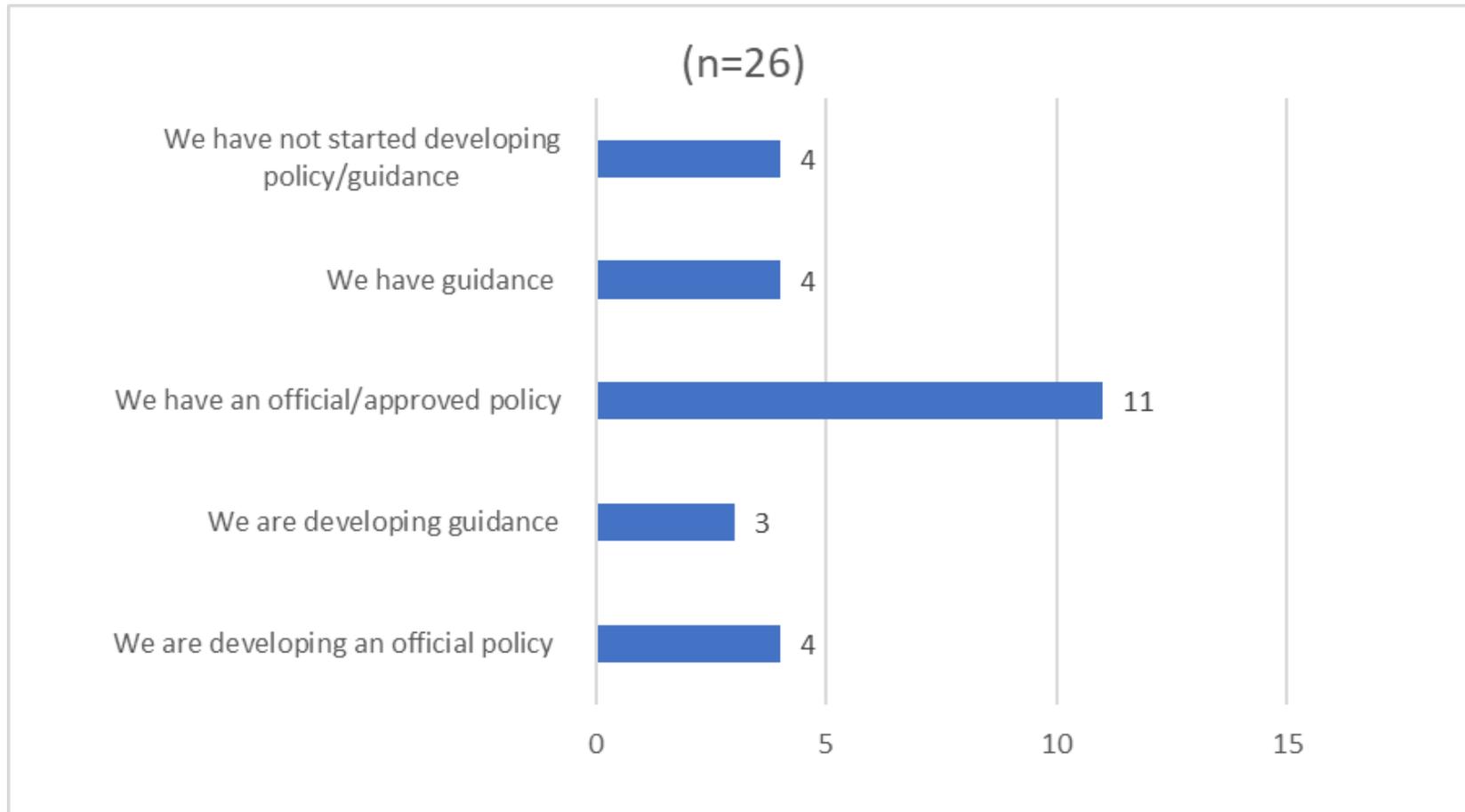
Q. 10 Do you think the research security program standards should allow institutions to take a risk-based approach to international travel?



Q. 11 Which statement best describes your international travel registry?



Q. 12 Which statement best describes your policy for international travel registration?





Institution's Top Concerns

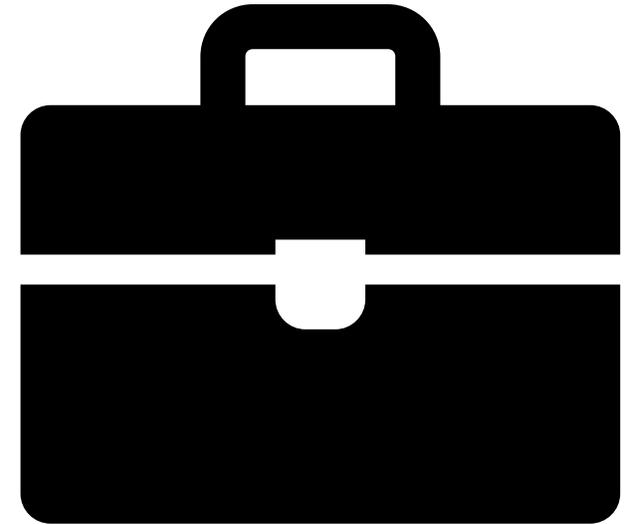
What would a risk-based approach to international travel authorization and security briefings look like?



NSPM-33 Draft Definition

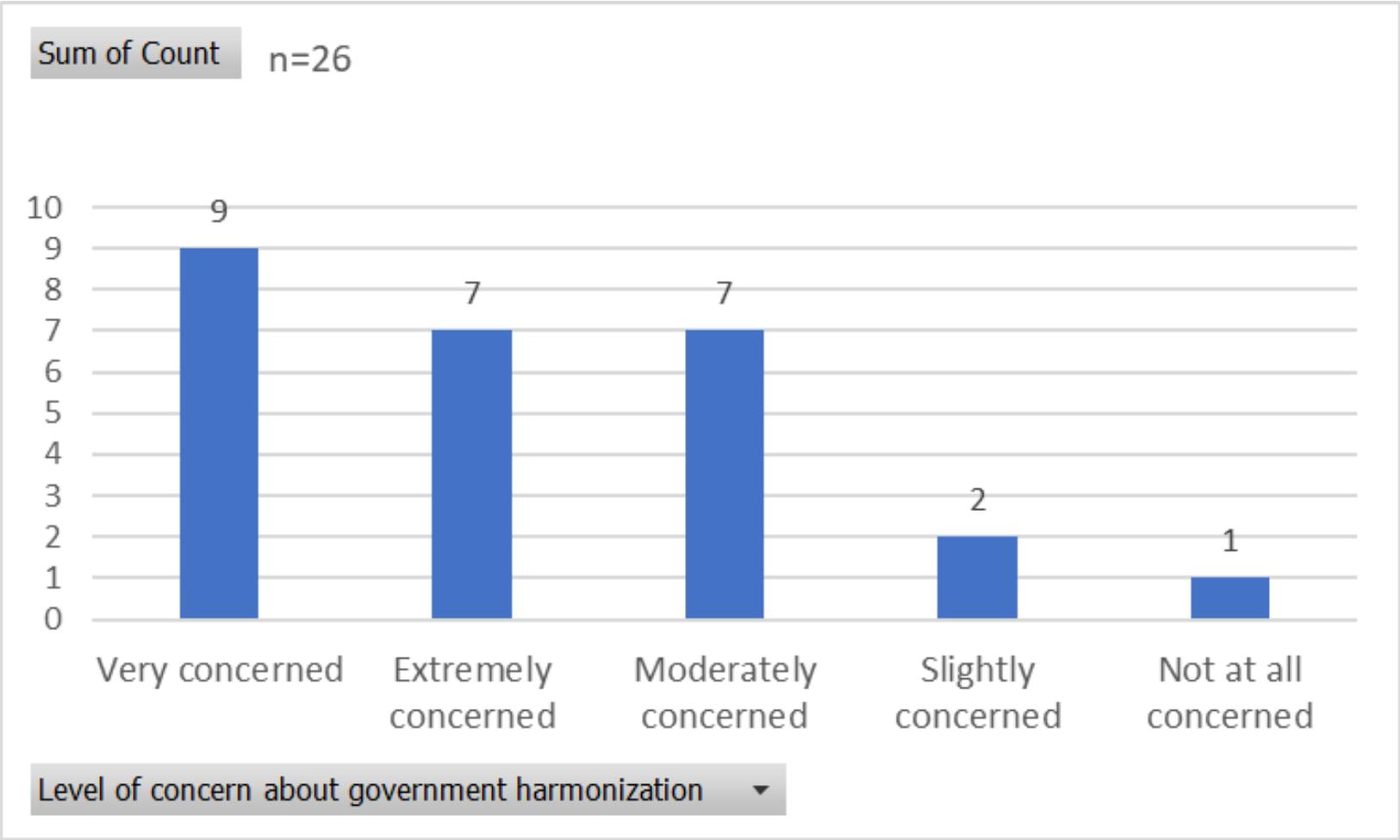
Covered international travel – Covered international travel is international, official business travel that contributes to a substantive, meaningful way to the development or execution of a research and development project proposed to be carried out with a research and development award from a Federal research agency.

Covered international travel may include travel by faculty, staff, or students seeking or receiving Federal research and development funding and researchers at Federal agency laboratories and facilities, including Government-owned, contractor operated laboratories and facilities, and other recipient institutions.

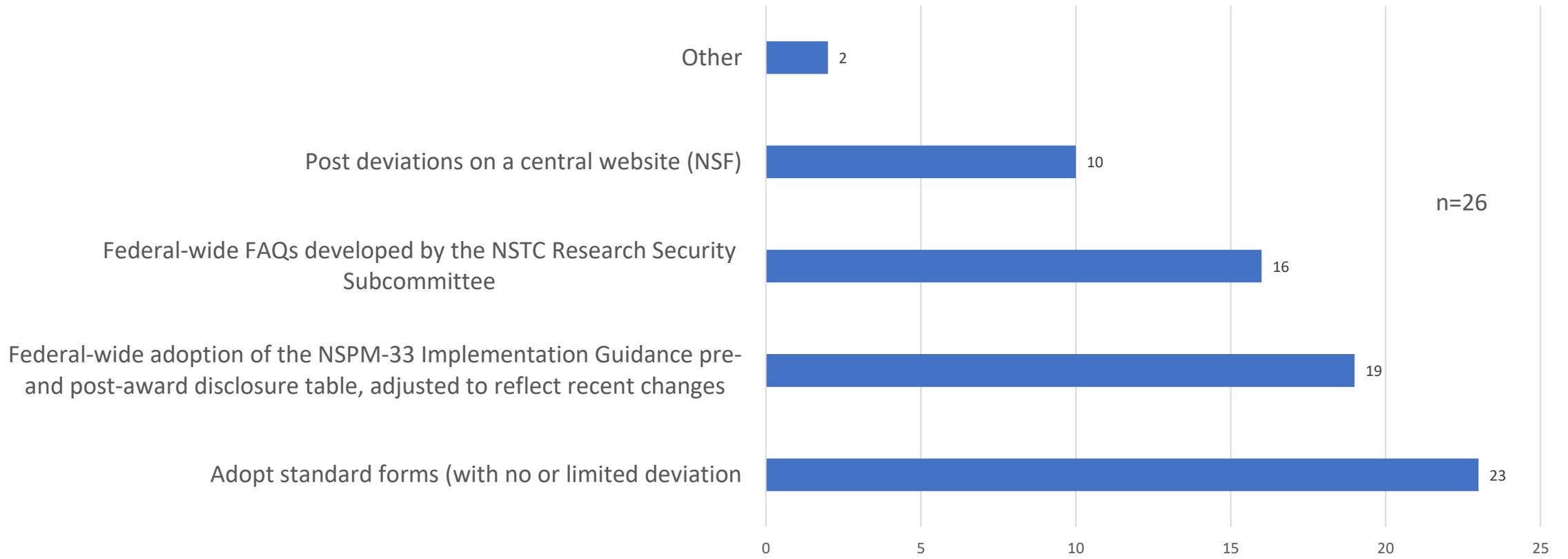


Disclosure: Federal-wide Coordination

Q. 19 Federal agencies have been working to harmonize the U.S. government’s disclosure requirements. How concerned are you about the potential for lack of harmonization (e.g., agency failure to adopt common forms, significant deviations, other)?



Q. 20 How might agencies better harmonize disclosure forms and processes?
Check all that apply.





NSPM-33 Implementation Guidance

Pre- and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending Support¹

Note: Where there are activities specific to the mission of the agency, this document may be modified by the Federal Research Funding Agency to address these disclosure requirements

September 1, 2022

Table Key

* = for new support only

◆ = If undisclosed at the time of application submission

Type of Activity	Biographical Sketch	Current & Pending Support	Facilities, Equipment & Other Resources	Project Reports	Post-Award Information Term & Condition	Disclosure Not Required
Professional Preparation (e.g., education and training)	✓					
Academic, professional ² or institutional appointments and positions, whether or not remuneration is received, and, whether full-time, part-time, or voluntary	✓					

Recap Top Concerns

Resources

Training

Cyber Security

Foreign Travel
Security

Flexibility

Cross-
Institutional
Coordination

Program
Standards

Disclosures

Faculty
Awareness



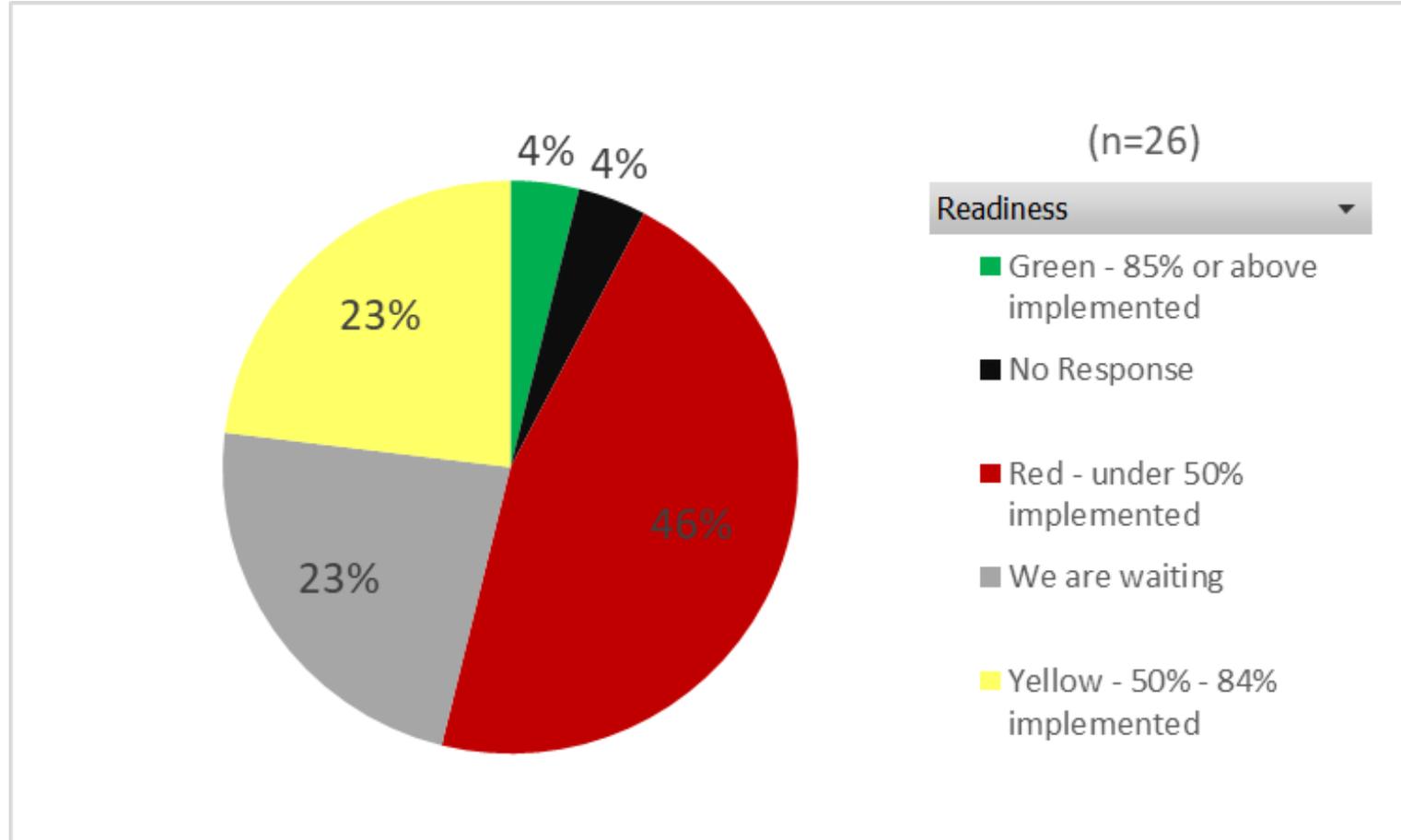
Panel Question

How are institutions approaching some of these residual challenges?

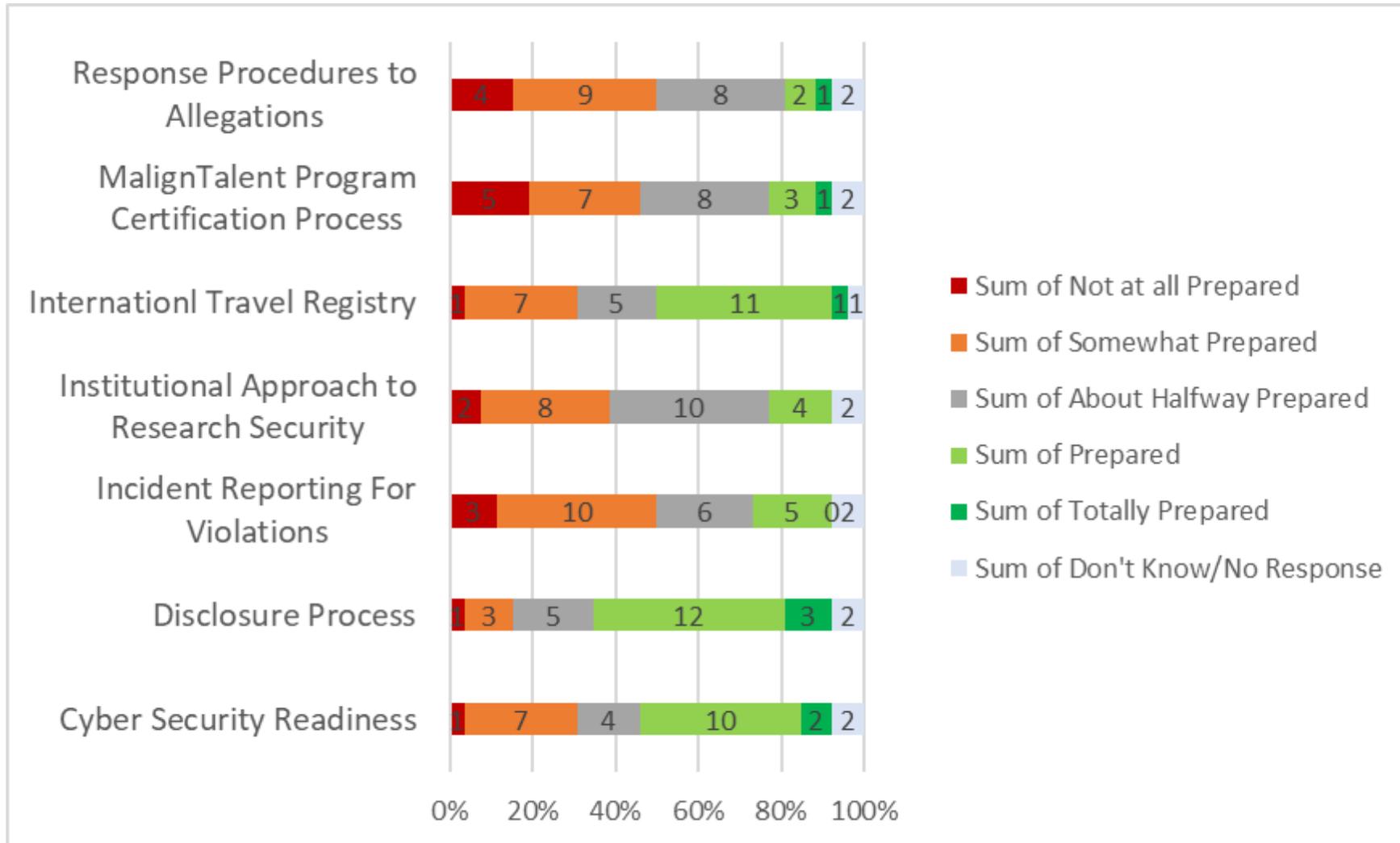


READINESS

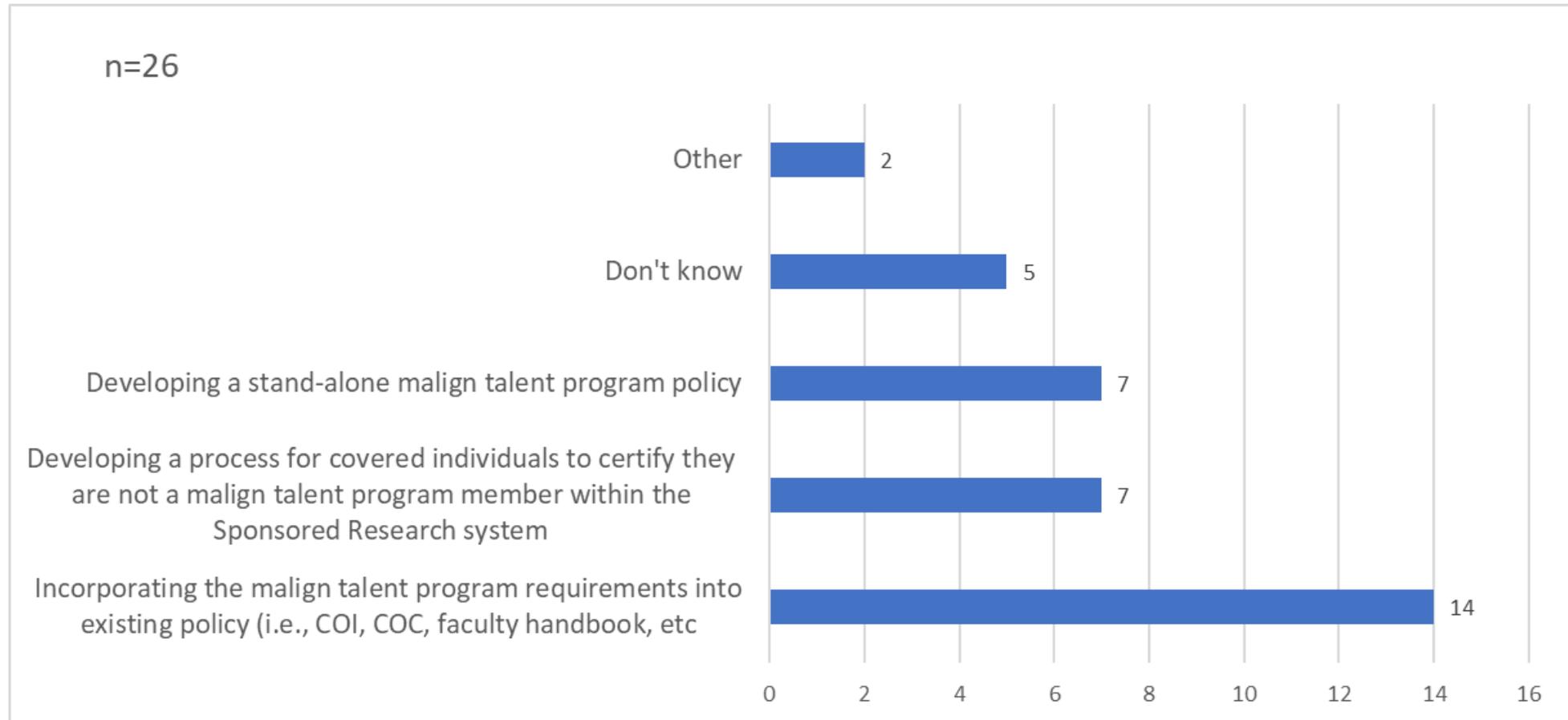
Q. 8 How would you describe your Research Security program readiness?



Q. 9 Which best describes how prepared you are in the following areas:

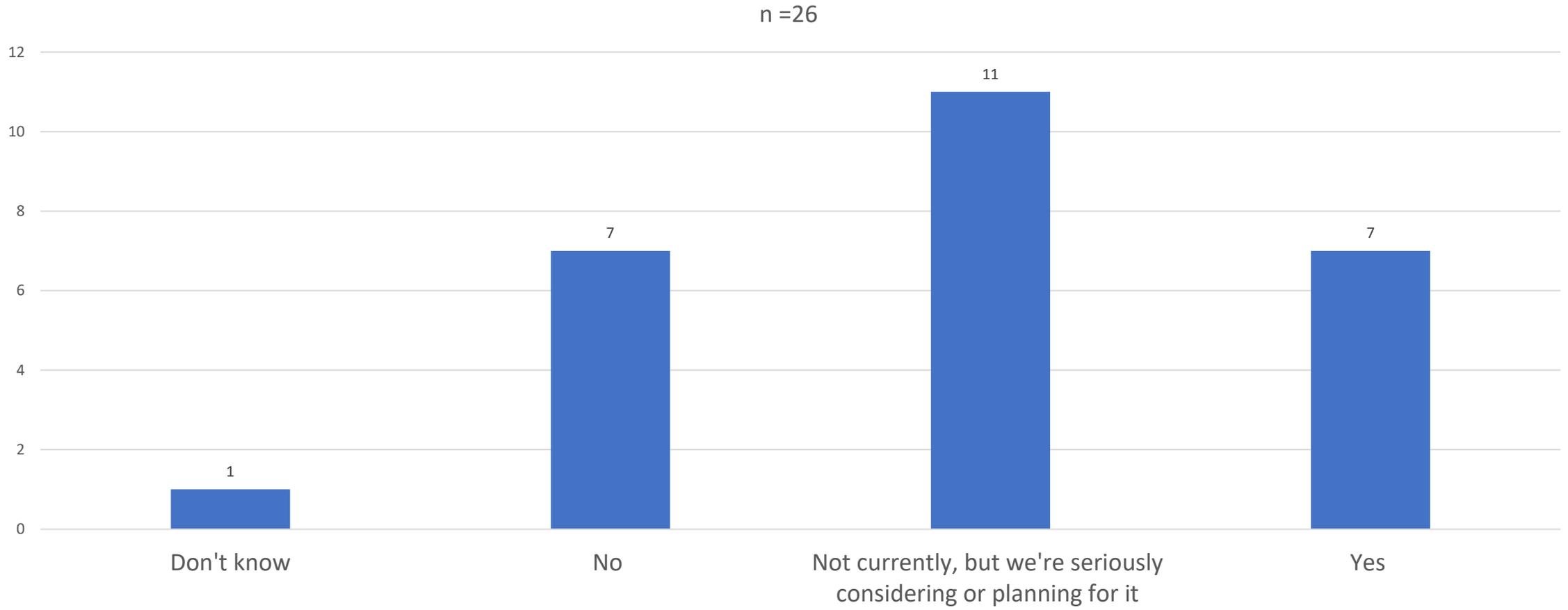


Q. 14 To meet the CHIPs & Science Act malign talent program requirements are you:
Check all that apply.

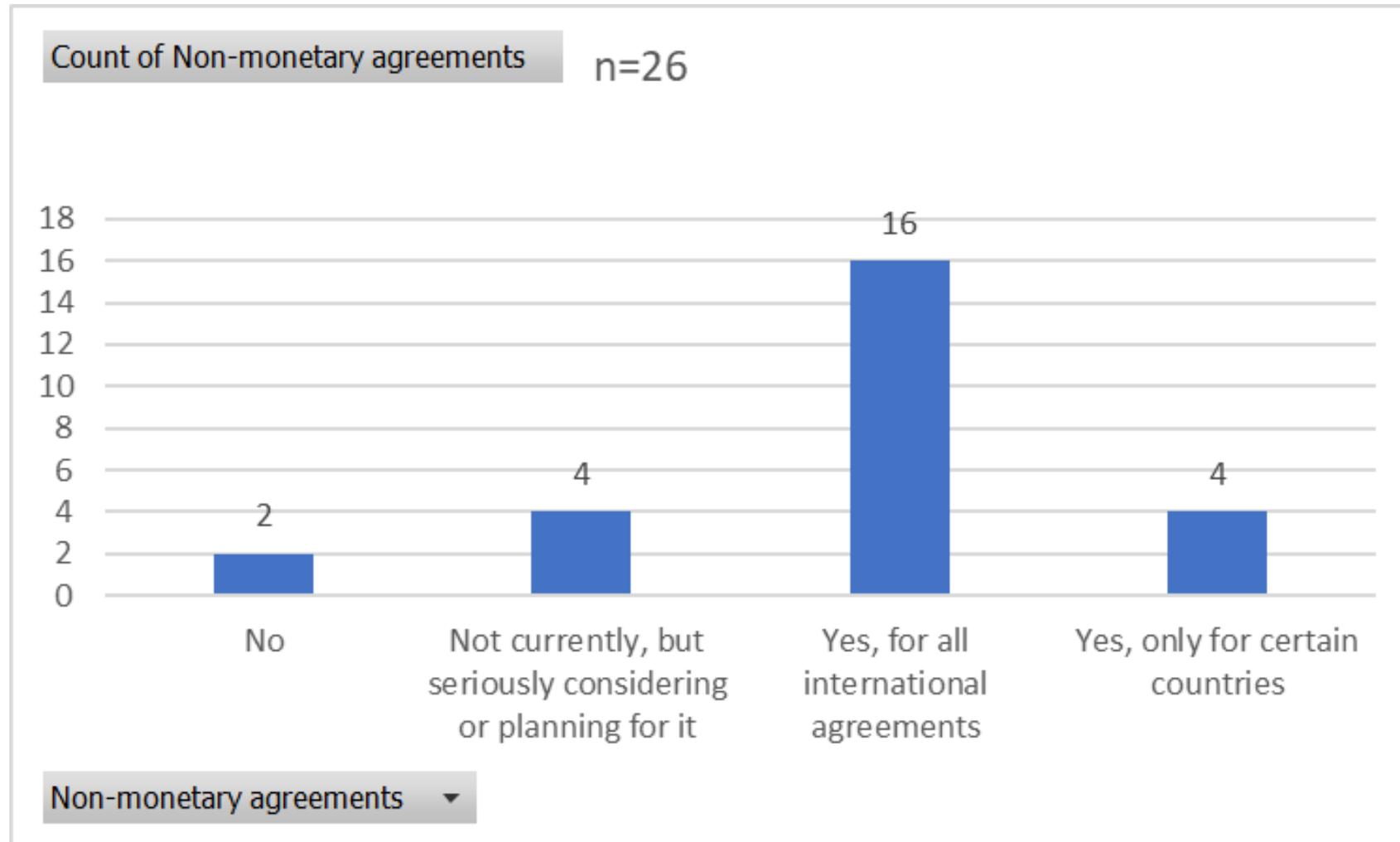


Risk Assessment

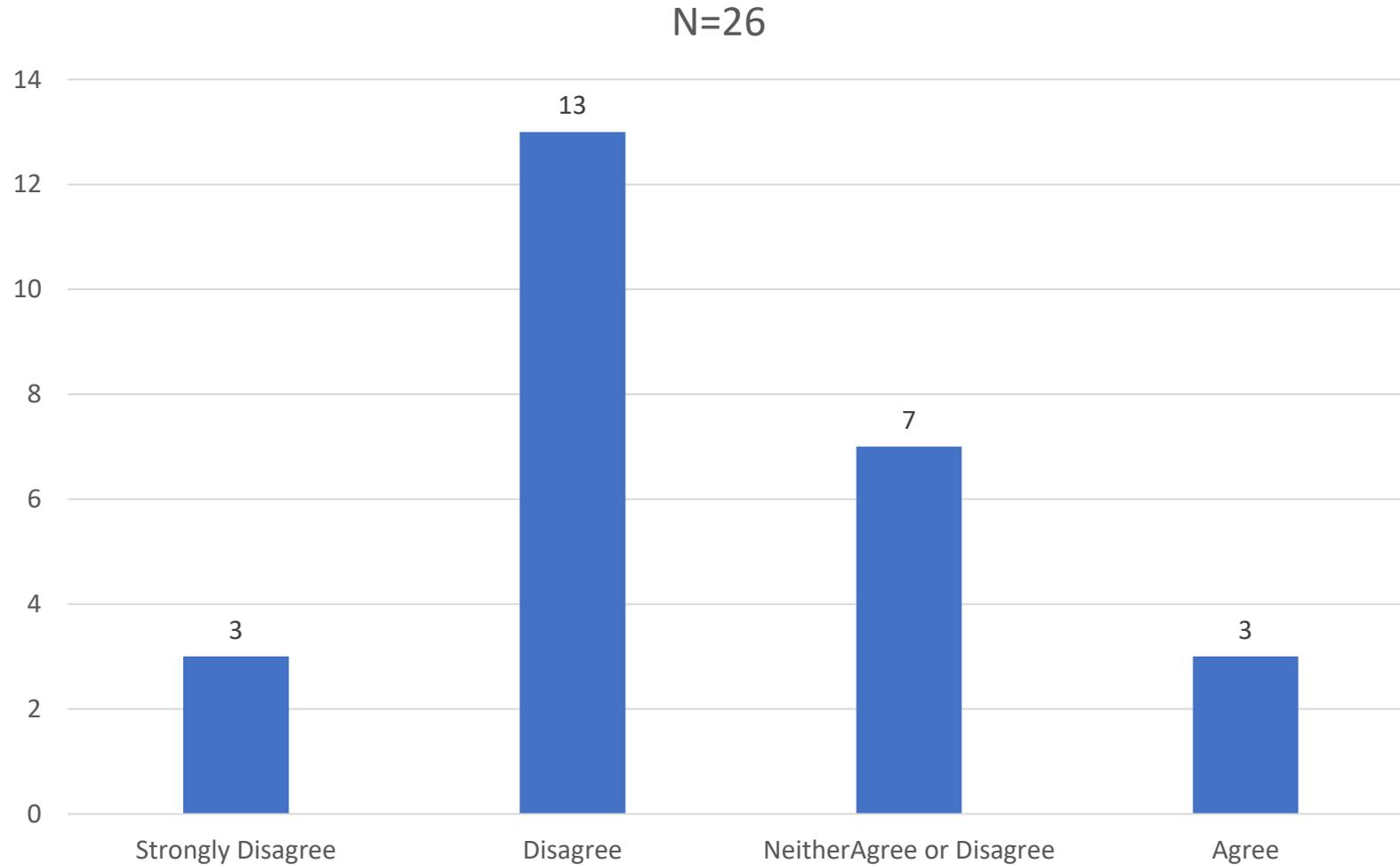
Q. 17 Has your institution developed a process to assess risk of covered individuals? (e.g., factors may include talent program participation, funding sources, affiliation with parties of concern/restricted entities, type of research, etc.)



Q. 18 Is your institution assessing international non-monetary agreements (e.g., data or material transfer and use, collaborative)



Q. 21 Please indicate your level of agreement with the following statement,
"Federal agencies have provided adequate information when deeming a
PI or covered individual high risk for foreign influence factors and requesting a mitigation plan."





Risk Assessment

What are institutional concerns around agency risk assessments with respect to international collaborations?



Complex Situations and Hypotheticals

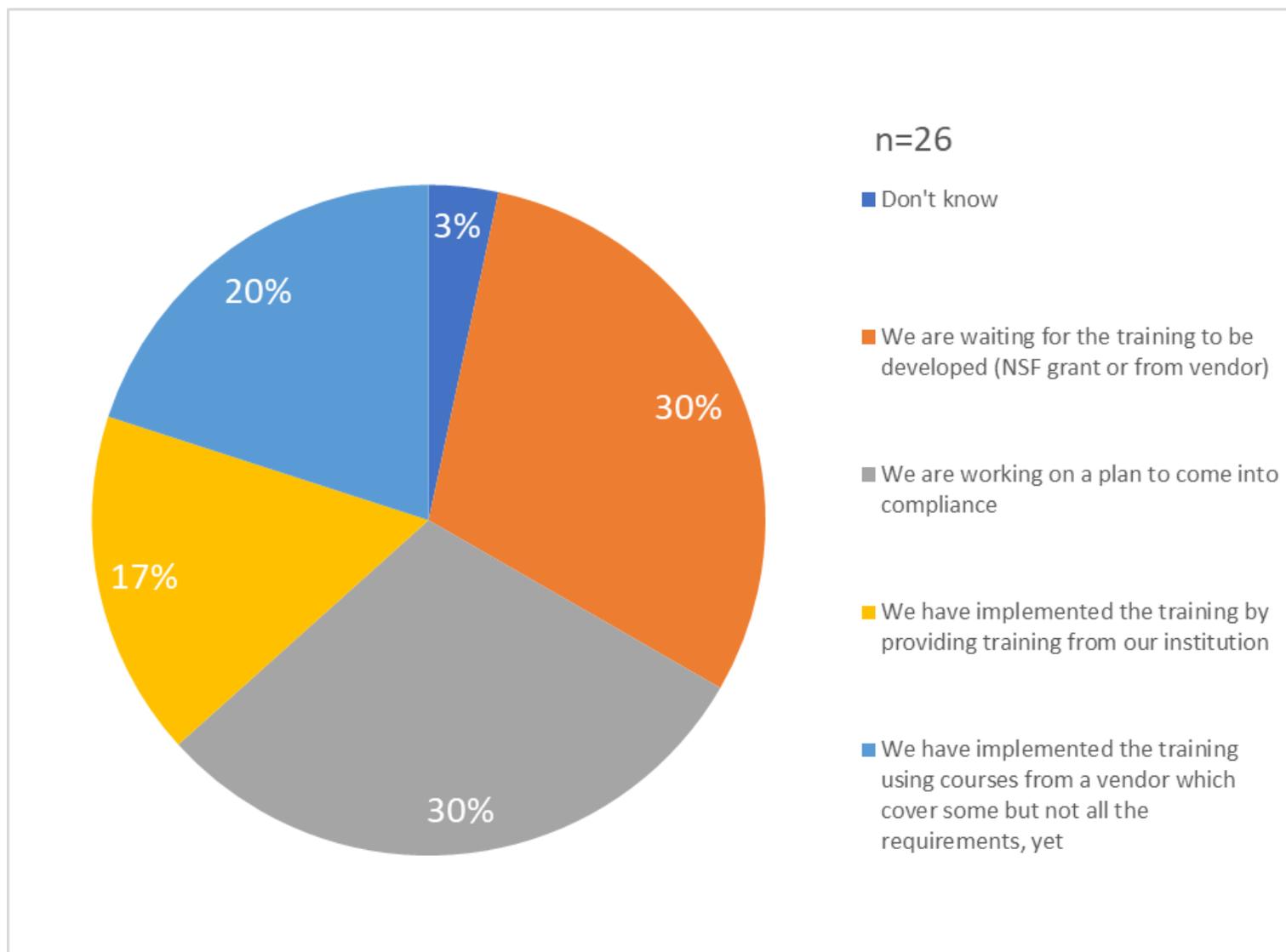
- **Situation 1:** Faculty members have been asked by former post-docs/trainees to lend their name to outside research with a foreign sponsor, some with the same title and aims as their current federally funded research project but with variations such as a different model system. Some included an MOU to the university; others were simply an outside activity. There was no direct benefit to the U.S. researcher, rather, an opportunity to support their former mentee. How do institutions review these opportunities? Considerations include possible benefits to the U.S. research enterprise versus potential risks (e.g., national economic).
- **Hypothetical 2:** Hypothetically, how do we evaluate visiting scholars from denied entities (sponsored and funded by the denied entity) that the U.S. government admitted on a valid Visa?
- **Hypothetical 3:** Hypothetically, a faculty member is offered an affiliation at a foreign university that is in a country of concern but is not on a restricted list. The affiliation is not part of an official talent program but clearly an effort to recruit talent, it is not malign or a COI or COC. It does involve research for a foreign entity and government, resulting publications, presentations, and potentially IP. It does not relate directly to U.S. funded projects.

Questions
or Comments



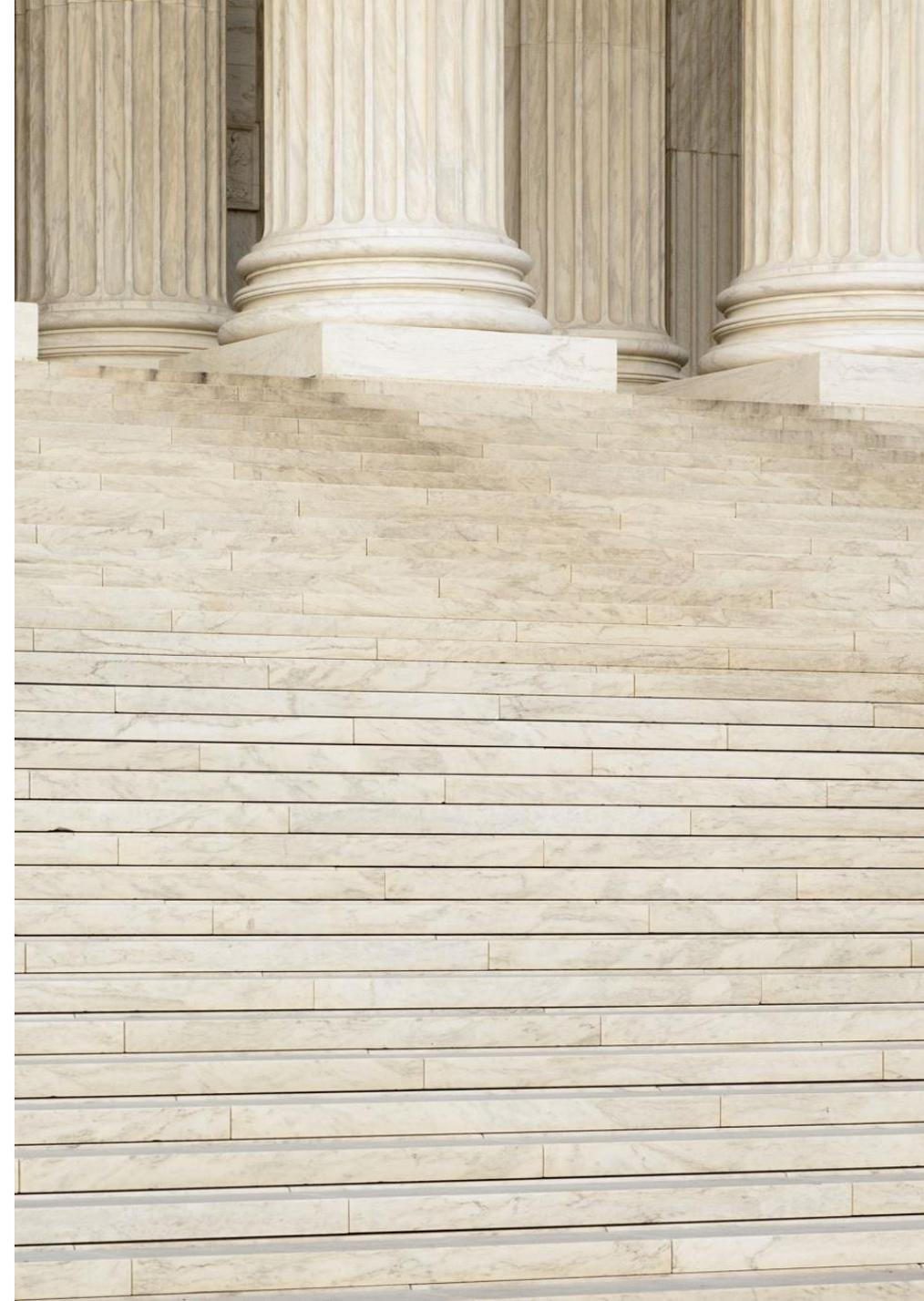
Backup Slides

Q. 16 Which statement best describes how you have implemented the RCR CHIPs Act training requirements?

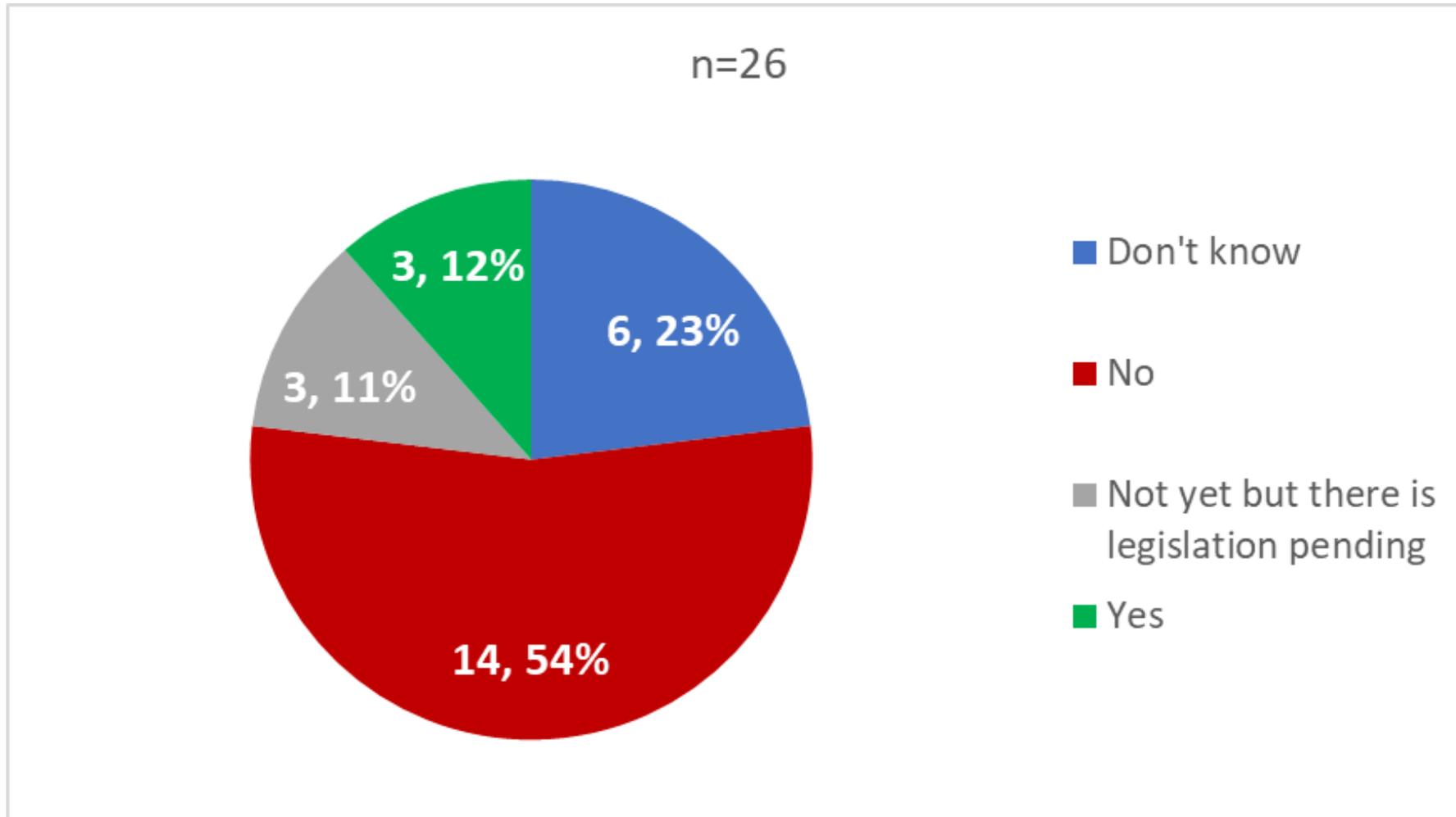


Q. 22 Does your state have foreign influence laws or regulations? IF YES: Please specify

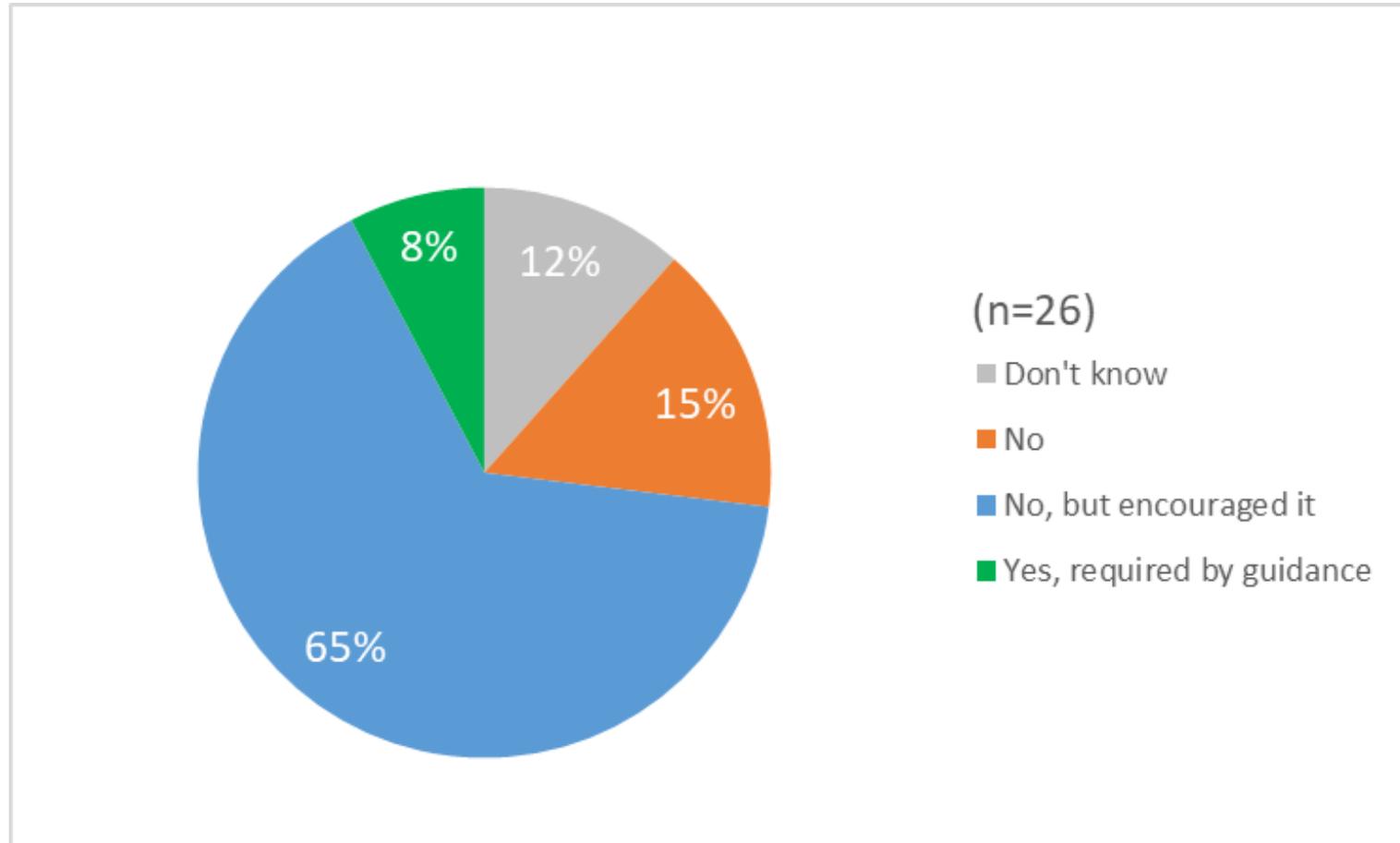
- Feb. 2022 Executive Order from the Governor regarding Russia's Unjust War on the Country of Ukraine (<https://governor.ohio.gov/media/executive-orders/executive-order-2022-02d>)
- Jan 2023 Executive Order from the Governor prohibition on Chinese social media applications on state owned or state leased devices (https://content.govdelivery.com/attachments/OHIOGOVERNOR/2023/01/09/file_attachments/2373098/Signed%20Executive%20Order%202023-03D.pdf)
- Yes, Russian funding and gifts to universities must be reported. (<https://www.in.gov/gov/files/Executive-Order-22-08.pdf>)
- It has laws on influence but do not specify foreign influence.



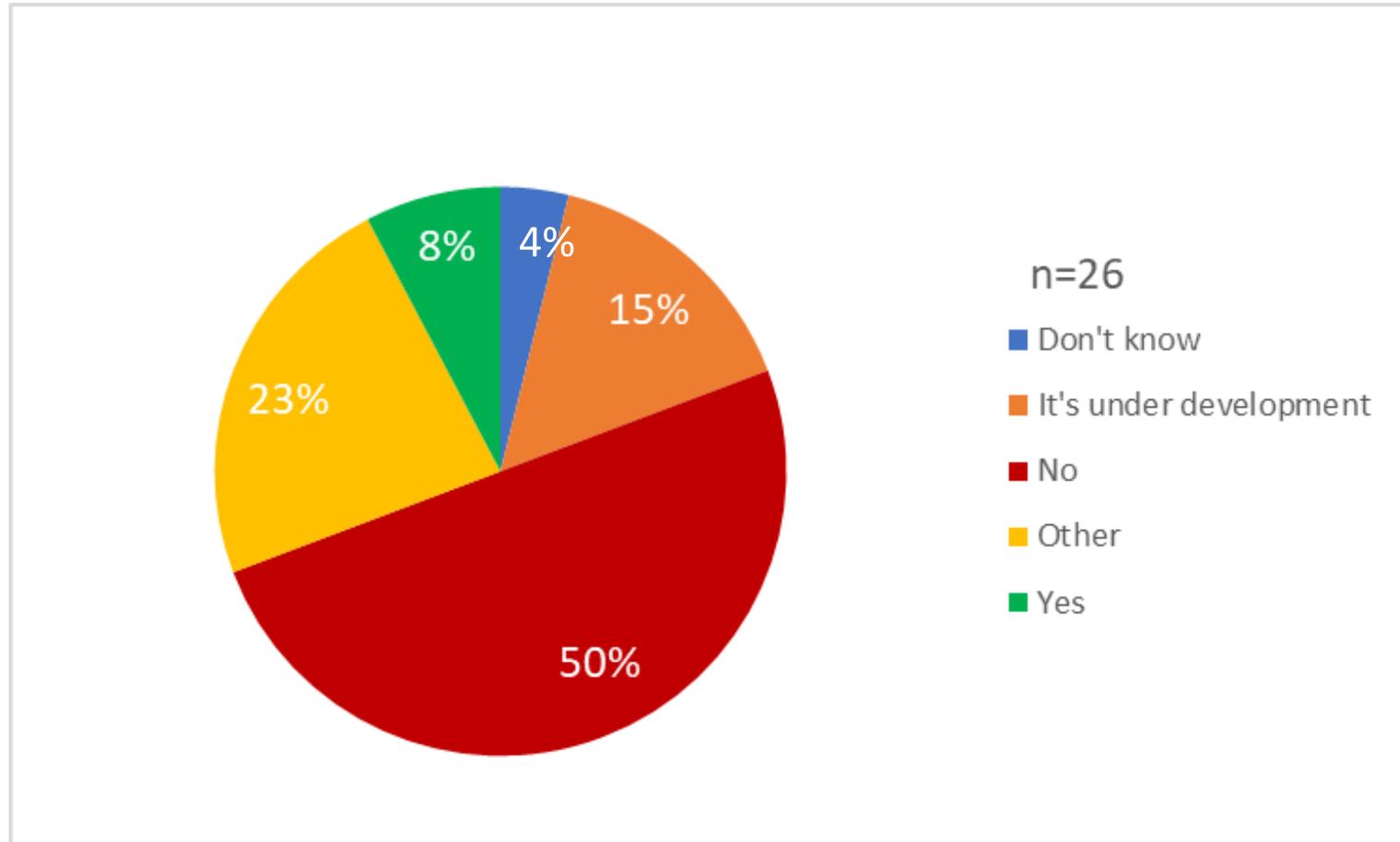
Q. 22 Does your state have foreign influence laws or regulations?



Q. 13 Do you require the use of a Digital Persistent Identifier (e.g., ORCID iD)?



Q. 15 Have you developed a TikTok policy or guidance?



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Thank you for participating!

