

## National Academies

Assessing Research Security Efforts in Higher Education: Meeting of Experts  
September 16 – 17, 2024

### Central Midwest Research Security Forum Survey

#### Organizations (22 of 33 completed, 67%)

Academic Medical Center: 1  
Non-profit Research Organization: 3  
Public University: 18

#### NSF HERD – total expenditures

More than \$1 billion: 5  
\$800M - \$1 billion: 4  
\$600M - \$800M: 3  
\$200M - \$600M: 4  
\$50M - \$200M: 2  
Less than \$50M: 3

86% required  
to implement a  
RS Program

**What research security policies, guidance, processes, actions, and activities has your organization developed and engaged in over the course of the last few years in response to federal requirements, inquiries or actions?**

Theme	Responses
Website	17
Training (outreach)	16
Policy	12
Disclosure	11
Travel (registry)	11
MFTRP (policy)	8
(risk) Assessment	7
(risk) Mitigation	5

90% have implemented a malign foreign talent recruitment program prohibition

Examples of research security activities include:

- Created cross-institutional research security committees
- Cross-checks on internal and external disclosures for accuracy
- Development and use of risk assessment tools for int. agreements
- Guidance materials for researchers to assess int. engagements
- Guidance for sponsored projects to identify risk mitigation language
- Updated international travel and visitor policies
- Drafted and implemented risk mitigation plans at agency request
- Defined research protections for university generated data
- Provide third-party screening tools to vet international collaborators
- Updated research security web resources
- A safety and security review at the time of the travel booking
- Developing training modules or training researchers in person

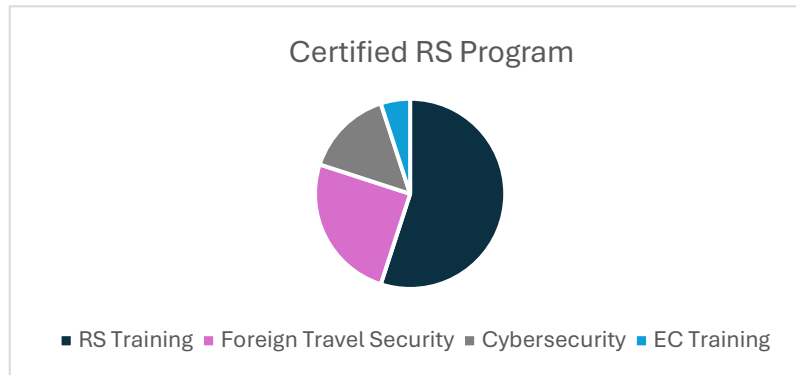
**What are your organization's top concerns or challenges regarding research security and/or federal research security requirements?**

<b>Chilling effects</b>	"chilling effect on international collaborations"; "chilling of international engagement and scholar recruitment/retention"; "risks associated with international engagements"
<b>Tracking</b>	"ability to track and ensure compliance."; "tracking all of the various requirements – we've developed a tracking spreadsheet"
<b>Lack of harmonization, consistency</b>	"inconsistencies in agency implementation"; "guidance not harmonized across agencies"; "OSTP's July 9 <sup>th</sup> memo provided a lot more latitude to the agencies to expand on the OSTP's requirements – putting institutions in the position of having to comply with various additional requirements beyond the minimum standards..."
<b>Resources</b>	"staffing and costs"; "unfunded mandate"; "being able to find enough staff with the required expertise"; "complexity and cost to an already expensive unfunded mandate"; "staffing is our number one issue and challenge"

**Increased burden**

“greater time obligations for administrative and compliance functions”; “increased administrative burden on researchers and compliance organizations”; “level of due diligence expected of us and having resources to conduct that due diligence”

**Of the following 4 elements of required research security programs, which element is currently a top priority for your organization to address?**



The majority were “concerned” or “very concerned” about federal agencies developing additional requirements for RS programs (too much agency latitude)

**What efforts are you taking or plan to take to ensure policies and guidance do not discriminate?**

<b>Faculty engagement</b>	“we also work closely and collaboratively with our researchers and provide significant support”; “faculty engagement is critical to inform policy and process”
<b>Messaging</b>	“consistent communication and reinforcing support for international research”; “we are very careful not to message information targeting China”; “Our focus is not on the country from which our faculty originate”; “remaining country agnostic”
<b>Mission/Values</b>	“implementation of a university-wide shared values initiative”; “we have developed a Research Security Assurance Plan that outlines our commitment to non-discrimination”; “RS mission statement includes anti-discrimination language”
<b>University-wide engagement</b>	“cross-campus team to review issues and developed tools to evaluate issues in a consistent way”; “we have created a Research Security Group with representation across the institution”; “engage the community in providing feedback and draft policies and processes”
<b>Policy stakeholders</b>	“we are closely working with our Office of General Counsel”; “we will work with general counsel and others to ensure the final program is non-discriminatory”; “we meet regularly with campus stakeholders such as our Chinese Faculty Association”; “worked a little with HR”; “we’ll have our policies reviewed by our CEDI office”; “we continue to engage and work with the Association of Chinese Professors”

**What has been your observation of how federal and/or institutional implementation of research security policies and processes has impacted faculty, international research collaboration, and/or proposal submission?**

Chilling effect

- “we are very concerned about the chilling effects related to co-authorship in fundamental research projects with entities that are not on U.S. restricted lists being considered high-risk and worthy of denying funding”; “overall effort has led to a chilling effect for faculty wanting to work with foreign investigators and universities, even in ‘non-countries of concern’ - they feel that the possible scrutiny is just not worth it anymore”; “fewer international research collaborations...too complicated and risky for faculty to navigate”; “faculty are fearful of engaging in new international collaborations”

Burdensome

- “although they (faculty) understand the importance of protecting research and scholarship, they feel the requirements are too burdensome and often pushback”; “another example of an unfunded mandate that continues to stretch institutional budgets and support staff responsibilities”; burden increasing when federal research agencies implement their certification requirements”; “placed much more work on research staff”; “mostly added burden to research administration staff so far”