NSPM-33
Implementation Guidance on Research Security Programs: Practical Considerations

Institutional Perspectives
Panelists

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& Director, URA, University of Chicago

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Director, Research Ethics & Compliance,
COGR
Research Security Program Requirements

Overview of NSPM-33’s Requirements
Requirements and Timeline

- Required for institutions receiving > $50 million/year in federal science & engineering support
- Research security Point of Contact
- Program documentation
- Institutional certification

90-day community engagement period

120-day development period of standardized requirements

Issuance of standards and development of implementation plan

Institutional compliance deadline: 1 year from issuance of formal requirement to comply
University of Pittsburgh

Institutional Approach

Allen DiPalma
University of Pittsburgh
Institutional Profile

- Private State Affiliated University in Pennsylvania founded in 1787
- 645 Degrees and Certificate Programs offered among its 5 campuses
- Over 10,000 degrees and certificates issued in 2021
- Undergrad Students = 24,603; Grad Students = 6,799
- Full-Time Faculty = 4,878
- **Strong Biomedical Focus:** Medical firsts include first polio vaccine and heart liver transplant
- FY 2021 research expenditures = $915 million
- Fundamental Research supported by Policy
- Long-standing Openness in Research Statement
Cybersecurity

- **Communications**: Multi-directional discussions. Clear message, casual approach.

- **Requirements**: Baseline cyber standards listed, but stem from FAR 52.204-21 “Basic Safeguarding of Covered Contractor Information Systems.”

- **Scope**: We know what is not included: research that specifies certain cyber safeguards (CUI). What’s left? Fundamental Research.

- **Concerns**: Broad application of 52.204-21 cyber standards to fundamental research results. Potentially high expense with challenging application especially for personally owned devices.

- **Bottom Line**: Uncertainty remains. Hoping for flexibility here.
Foreign Travel Security

- **Communications:** Very targeted discussion with those involved with travel systems: Pitt’s Office of Global Operations, and SVC Research.

- **Requirements:** Very proscriptive. Written policies/guidelines expected. Pre-registration review and approvals. Travel assistance for security briefings, electronic devices.

- **Scope:** Faculty and staff traveling for organizational business, teaching, conference attendance, research purposes, or any offers of sponsored travel that would put a person at risk.

- **Concerns:** Faculty reaction. Policy alignment. Systems.

- **Bottom line:** Well defined expectations.
Export Controls

- **Communications:** Office of Trade Compliance analysis and outreach to affected stakeholders.
- **Requirements:** Provide export controls training, as appropriate, to those involved in R&D projects subject to export control restrictions.
- **Scope:** Relevant Pitt personnel (faculty, staff, students, visitors).
- **Concerns:** Awareness of Pitt’s export control program requirements, “export controls” spotting/identification, existing training.
- **Bottom line:** It’s a good time to evaluate export program manuals, training, and restricted party screening management.
Research Security Training

- **Communications**: Office of Trade Compliance, Research Protections, and SVC Research Offices sharing/analyzing information.

- **Requirements**: Provide training to relevant personnel on research security threat awareness and identification, including insider threat training where applicable.

- **Scope**: Relevant Pitt personnel (faculty, staff, students, visitors)

- **Concerns**: Research security topics are numerous - Will any training developed now satisfy future requirements?

- **Bottom line**: It’s a good time to start thinking about training content, available delivery methods, central website, and RS POC.
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About Brown

“The mission of Brown University is to serve the community, the nation and the world by discovering, communicating and preserving knowledge and understanding in a spirit of free inquiry, and by educating and preparing students to discharge the offices of life with usefulness and reputation.”

- 786 regular faculty
- 6,600 undergraduates
- 2,500 graduate students
- 600 medical students
- 4 major academic divisions
- >40 academic departments
- $200 million annual research expenditures
- Located in Providence, RI
- Largest Research Funders: NIH, NSF
- Organization: Chancellor, President, Provost, VPR
Brown University is committed to preserving and protecting the freedom of research and to maintaining a teaching and research environment that is open and that promotes the free exchange of research results.
Openness in Research Policy

- Brown University will not undertake classified or secret research;
- Brown University will not accept terms and conditions that allow modification to or approval of publications by an external sponsor;
- Brown University will not accept publication restrictions, including unspecified publication delays or terms that prohibit or restrict dissemination;
- Brown University will not permit an external sponsor to exercise technical direction of the work or require re-performance of the work until the sponsor views it as acceptable;
- Foreign faculty, students, and scholars will not be singled out for restriction in access to Brown University’s educational and research facilities and activities;
Openness in Research Policy

- Brown University will not enter into a contract or grant to carry out research if the contract or grant restrains the freedom of the University to disclose the:
  - Existence of the contract or grant; or
  - Identity of the sponsor or contracting entity; or
  - Type of the research to be conducted; or
  - Research results
Brown’s Approach

- With publication of JCORE and NSPM-33 Corporation (our Board of Trustees) initiated an Ad Hoc Committee

- Ad Hoc Committee reviewed COI, COC, Travel, Information Security, Export Controls and other areas that are impacted

- Report found that for Brown’s current profile we are doing the right things

- BUT: also analyzed our activities relative to the suggested requirements and made recommendations
Ad Hoc Committee “To Do List”

- Specific recommendations related to some of the suggested requirements
- Areas of opportunity related to the guidance
- Educational needs related to the above
- Resourcing needs related to the above
Where are we now?

- Ad Hoc Committee report has been reviewed and accepted by the President and presented at a Corporation meeting.
- We have just formed an “implementation working group” to map out the steps to take for opportunities and recommendations.
- We have strong collaborations with IT, Dean of Faculty, and Global Engagement.
- OVPR includes COI, some COC, Export Control.
Where are we focusing?

- Increasing collaboration with non-research COI and COC
- Creating a more nuanced approach to implementing security and training where appropriate
- Surfacing areas that are not resourced for the new world
- Double checking our processes
Washington State University
Institutional Approach
Dan Nordquist
Institutional Profile

- WSU, public land-grant
- 79 master’s degree programs, 65 doctoral degree programs, 3 professional degree programs:
  - Medicine
  - Pharmacy
  - Veterinary Medicine
- 31,159 students across 6 campuses
- $357.6M NSF HERD – FY21
- Fundamental research focus
- Mascot: Butch T. Cougar (Go Cougs!)
My First Read...of the Guidance

- Disclosure, disclosure, disclosure
- Then #5 – “Research Security Programs” (the good stuff)
- What do I do now? Who do I talk to? Who do I involve? Why am I leading the effort?
- Bottom line - Sponsors will ask me a document or a link
My Second Read…

- Divide and Conquer, get the ball rolling
- Started with emails to Campus Subject Matter Experts
- Brief the VPR
- Now committees, presentations, campus wide communications, President involved
My Third Read...

- Dig in a bit deeper
- Cyber: we meet 11 of 14 criteria (really analyzing “the three”).
  - Limit information system access to the types of transactions and functions that authorized users are permitted to execute.
  - Verify and control/limit connections to and use of external information systems.
  - Identify information system users, processes acting on behalf of users, or devices.
- IT POC Teams Chat
  - Big fiscal worry is documentation and enforcement
Still on Third Read...

- Foreign Travel Security
  - Big worry for us: Security Briefings
- Research Security Training
  - Well….what’s supposed to be in it?
- Export Control Training
  - As appropriate
- Research Security POC
  - Who should this be?
Our Guiding Principles

• WSU is committed to enhancing and growing our international research collaborations with respect, openness, and transparency!

• This includes those with backgrounds from China and other countries.
University of Chicago

Institutional Approach

Jennifer Ponting
Established in 1890 by John D. Rockefeller

Faculty: 2,377 full-time faculty

52 majors and 41 minors in the undergraduate College and 5 divisions and 6 professional schools for graduate study

Undergraduate Students: 6,800
Graduate & professional students: 10,159

Honors: 92 Nobel Prize winners, including 6 current faculty

Manages Argonne National Laboratory and Fermi National Accelerator Laboratory for the Department of Energy as well as Marine Biological Laboratory
UChicago: Current Analysis

Focused Analysis for the Institutional Approach In a de-centralized model

- Identify the Gaps in Current Process and Policies
- Coordinate Research and Non-Research Stakeholders
- Identify Function Areas and necessary resource allocations
Focused Analysis for Institutional Approach

- **Cybersecurity**
  - UChicago does not have cybersecurity program that meets all of these requirements.
  - Expansion of the current cybersecurity program will be needed.

- **Foreign Travel Security**
  - UChicago has robust Travel Tools but currently no prior approvals required for travel
  - Major Cultural Change for UChicago if all International Travel becomes "Research Security"

- **Research Security Training**
  - Vague requirements
  - Expansion of researcher training will be needed

- **Export Control Training**
  - UChicago utilizes CITI export control training modules