

# Workshop on Compliance with Research Security Requirements and the Associated Cost of Compliance Survey

September 27, 2023

# COGR

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# Speakers

Moderator:  
Kris West



**Allen DiPalma**

*Director, Office of Trade  
Compliance*

[University of  
Pittsburgh](#)



**David Kennedy**

*Director, Costing &  
Financial Compliance*

[COGR](#)



**Kris West**

*Director, Research  
Ethics & Compliance*

[COGR](#)



# And Special Thanks to Our Workshop Planning Group!!

Lynette Arias, University of Washington,

Theresa Colecchia, Johns Hopkins University

Allen DiPalma, University of Pittsburgh

Stephanie Endy, Brown University

Jeremy Forsberg, University of Texas at Arlington

Bruce Morgan, University of California, Irvine

Lisa Mosley, Yale University

Dan Nordquist, Washington State University

Elizabeth Peloso, University of Pennsylvania

Stacy Pritt, UT Southwestern Medical Center

Maria Soliman, University of Iowa

# Workshop Overview

- **Workshop Logistics**
- **Overview of Current Landscape**
  - What's been issued? What are we still waiting for?
  - COGR Toolbox of research security “tools” from member institutions
- **Some Poll Questions to Get Us Started!**
- **Overview Cost of Compliance Survey**
  - Upcoming Phase II Survey Methodology & Anticipated Timeline
- **University of Pittsburgh's Experience**
- **Breakout Room Discussions**
- **Breakout Room “Readouts” and Q&A**

# Current Research Security Landscape related to NSPM-33 & 2022 CHIPS and Science Act Implementation

## What we have :

- [NSPM-33 Implementation Guidance](#)
- [DOD Countering Unwanted Foreign Influence in Department-Funded Research at Institutions of Higher Education](#)
- [NIH Foreign Interference website](#)
- [NSF Research Security website](#)
- [NSF-77 Data Analytics Application Suite](#)
- [NIH](#), [NSF](#), and [DOE](#) guidance on disclosures and foreign talent program participation
- Related agency disclosure requirements (e.g., [DOE interim COI policy requirements](#), [NASA COI policy](#))

## What's on the horizon:

- [Final NSTC Common disclosure forms](#)
- [Final Research Security Program standards](#)
- [NSF research security training modules](#)
- [NSF Research Security and Integrity Information Sharing Analysis Organization \(RSI-ISA0\)](#)
- [NSF final 2024 Proposals and Awards Policies & Procedures Guide \(PAPPG\)](#)
- Reporting of foreign gifts & contacts to NSF ([2024 PAPPG, Chapt. II.B.2](#))
- Certification to NSF of non-participation in malign foreign talents programs ([2024 PAPPG, Chapt. II.D.1.d. & e](#))

# **Major Compliance Areas (with associated costs!)**

- **Disclosures – requirements for researchers and for institutions**
- **International travel tracking**
- **Cybersecurity**
- **Training – research security & export controls**
- **Compliance with certifications**
- **Program structure and monitoring**

# Research Security Toolbox

- Research security resources from COGR member institution.
- Available to COGR members on COGR Portal (requires log-in to enter portal)
- Have a tool to share? Email Kris West at [kwest@cogr.edu](mailto:kwest@cogr.edu)
- Link: [COGR Member Portal \(member365.org\)](https://member365.org)



# Poll Questions – Poll 1

As of today, which of the following statements best describes where your institution is in preparing for compliance with anticipated research security program requirements?

- a. We've done lots of planning, but we're waiting for the final program requirements so we can analyze them before proceeding further.
- b. We have assessed our current policies and processes that we think we'll be able to leverage to address the requirements.
- c. Between policies/processes we had in place and some we added, we think we'll be good to go.
- d. We bought pizza and sodas and invited everyone at our shop to join this workshop so they can see why leave requests won't be approved after the standards come out.

# Poll Questions – Poll 2

How is your institution approaching the NSPM-33 requirement for designating a point of contact for research security?

- a. We already had an employee whose current job description encompasses these duties.
- b. We have/will re-allocate these duties to existing employee(ees).
- c. We have/will hire a new employee(ees) to take on these responsibilities.
- d. We all drew straws, and I am watching this workshop because I lost.

# Poll Questions – Poll 3

Who at your institution is taking the lead in research security program preparations?

- a. Vice President for Research Office
- b. Compliance Office
- c. Research Security Office
- d. Export Control Office
- e. Office of Sponsored Programs
- f. No single office is taking the lead; responsibilities are shared or we have a committee
- g. Other (tell us in the chat)

# Poll Questions – Poll 4

How is your institution networking all of the various units that will be involved in implementing the research security program requirements?

- a. Coordinating through a committee.
- b. Non-committee formal communications and planning processes.
- c. Informal communications and planning processes.
- d. We meet at the same bar every Friday night for drinks.
- e. Other (tell us in the chat).

# Poll Questions – Poll 5

From the list below, please select the top three areas/process at your institution that you think will require the most additional resources (e.g., materials, services, equipment, personnel and associated budget) to achieve compliance with the research security program requirements?

- a. Information technology
- b. Export controls
- c. International travel processes
- d. Pre-award services
- e. Post-award services
- f. Conflict of interest/conflict of commitment
- g. Research compliance
- h. Other (tell us in the chat)

# **Overview of Cost of Research Security Survey, Phase II**



# Why Another Survey?

- Cost of Compliance – NSPM-33 Disclosure Requirements,  
November 2022
- Cost of Compliance – NIH Data Sharing and Management,  
May 2023
- **Survey of F&A Cost Rates** (final report, coming soon, at a theatre near you!)

To quote a good friend: *“Dave- what new tactics can we try to convince federal agencies and Congress that the admin/costing issues around these mandates are killing us!!”*

# Data-Driven Evidence

First and most importantly, we appreciate your willingness to participate in the upcoming survey. The results will inform COGR's ongoing advocacy efforts describing the impact of administrative burden on the quality of science, the ever-increasing cost of compliance, and the intersection with how the American public values the contribution of science to its standing in the global socio-political economy. Second, the results of the survey provide COGR with a rich set of data from a diverse population of research institutions, ***which allows us to respond to these critical issues with data-driven evidence.***

# Survey Approach ...








Assign “Burden Factors” to a matrix capturing “Compliance Requirement” and “Organizational Unit.”

## Burden Factors (used in DMS Survey):

- 1 – Low Impact** (e.g., no new staff, no reallocation of existing staff effort, no new training, no new IT/technology, etc.)
- 2 – Low/Moderate Impact** (e.g., no new staff, some reallocation of existing staff effort, some new training, some new IT/technology, etc.)
- 3 – Moderate/High Impact** (e.g., consideration of new staff, more significant reallocation of existing staff effort, new training, new IT/technology, etc.)
- 4 – High Impact** (e.g., serious consideration of new staff, significant reallocation of existing staff effort, significant new training, significant IT/technology, etc.)

# For Example ...

## Compliance Requirement #1, NSF Reporting Module:

	1	2	3	4	NA
Vice President of Research					
Compliance Office					
Research Security Office					
Export Control Office					
Office of Sponsored Programs					
Researchers/Faculty/PIs					
Graduate Students					
Other					

# And Ultimately ...

## Compliance Requirement #1, NSF Reporting Module:



Burden Factors of **3–Moderate/High Impact** and **4–High Impact** can be translated into \$ figures, which allows us to estimate the cost of compliance both for a specific compliance requirement and for a particular organizational unit (including faculty!)

# University of Pittsburgh's Experience



# Hypothetical Timeline for Schools to Become Compliant with Research Security Program Requirements



# Actions Taken/Preparations Made

- Socialization: Constant and multi-directional
- Responsible Office: The Office of Research Security & Trade Compliance (ORSTC)
- POC: ORSTC Director (A. DiPalma)
- RS Website: In development
- RS Policy Creation/Oversight: Undecided
- Policy Review/Creation: Data Governance, Human Data/Tissue Sharing, COI, Outside Employment/Consulting, Academic Visitors, IT Security and Reporting, Export/CUI
- Capital Budget Request based on NSMP-33 Implementation Guidance: Provost, SVC Research, CFO, Travel, IT Security



University of  
Pittsburgh

Pitt Research  
Office of Research Protections

## August 2023 Newsletter

Stay up-to-date with the latest news and resources from the Office of Research Protections (ORP)

Common Funding Agency Disclosure Forms for  
Other Support and Biographical Sketches

# Pitt RS Budget Request Based on NSPM-33 Implementation Guidance

## Foreign Travel Security

### Personnel:

- Global Operations Support Director
- International Travel & Safety Coordinator/Data Analyst

### Non-Personnel:

- Global Operations systems support
- ISOS report Integration & training
- Concur pre-registration software & implementation

## Cybersecurity

### Personnel:

- Security Engineer
- GRC Analyst
- Threat and Incident Analyst

### Non-Personnel:

- CUI: GCC High Configuration, set-up, third party consultant
- CUI: GCC High G5 Licenses
- Cyber Organizing & Tracking system for reporting

## Research Security Training

### Non-Personnel:

- LMS Management System tracking & certification adoption & integration (perhaps CITI?)

## Export Controls, Institutional Support

### Personnel:

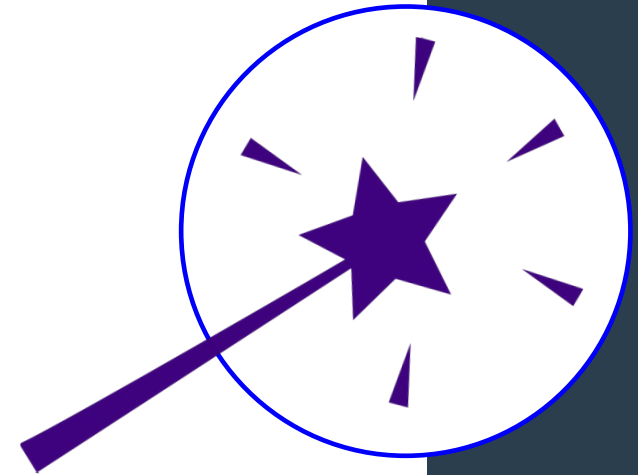
- Disclosure Compliance Director

### Non-Personnel:

- Disclosure integration costs: multiple system upgrades for COI, OSP, Export Controls, Visitors, RS Training (perhaps CITI?)

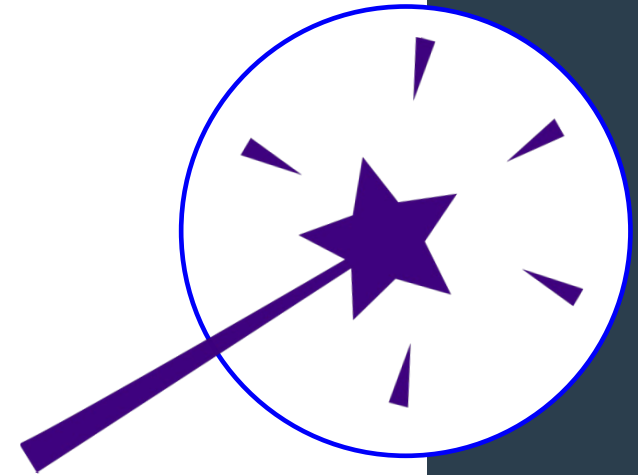


**Through the magic of the  
internet, let's Zoom to our  
breakout rooms!!!!**





**Welcome back. We'll  
resume shortly.**



# Breakout Room Readouts

