Northwestern University | Research Security Program Overview

Northwestern University has an established research security program within the Office for Research under the strategic direction of the Vice President for Research and Chief Research Operations Officer (CROO). The Research Security program is led by the Associate Vice President for Research, Crista Brawley, and the Export Controls and International Compliance team's Senior Director, Amy Weber, with cross-campus support from its Research Security Leadership Working Group. We describe our current research security program below and more information is available on Northwestern's research security website:

Research Security Leadership Working Group: Northwestern established a Research Security Leadership Working Group, which has 13 founding representatives and approximately 25 members from across campus. This group collaborates to support the research community through creating research security training, developing other resources, establishing the international travel registry for covered individuals conducting research, updating the export controls training, and implementing cyber security solutions. This working group has developed subgroups for the four main areas that need to be implemented in response to NSPM-33: (1) mandatory annual research security training; (2) foreign travel registration for covered researchers and mandated federal training every six years; (3) export control training for personnel working with controlled technology; and (4) cybersecurity measures.

Advisory Committee: Northwestern also established a Research Security Advisory Committee to review complex foreign collaborations, affiliations, and potential relationships that Northwestern or its faculty want to engage in. This committee includes representatives from Conflicts of Interest Office, Export Controls & International Compliance (ECIC), Information Technology, Office of General Counsel, Office of the Provost, Office for Research, Research Integrity, Risk and University Compliance, Research Compliance, and Sponsored Research as well as faculty representation.

The review meetings are Chaired by the OR CROO and OR AVP. The advisory committee reviews and determines whether proposed activity may be considered a malign foreign talent recruitment program or pose a higher than typical foreign influence risk for a faculty member, school, or the University. The team makes recommendations to senior executive leadership including the VPR, Provost, and President, when appropriate. The goal is to facilitate research and international collaborations within the regulatory framework that is applicable, and to develop mitigation strategies when needed. However, in a small number of instances the advisory committee may need to advise leadership that something is possibly against federal law. The committee's guiding principles are outlined in Northwestern's Research Security mission statement, which emphasizes the importance of open collaborations.
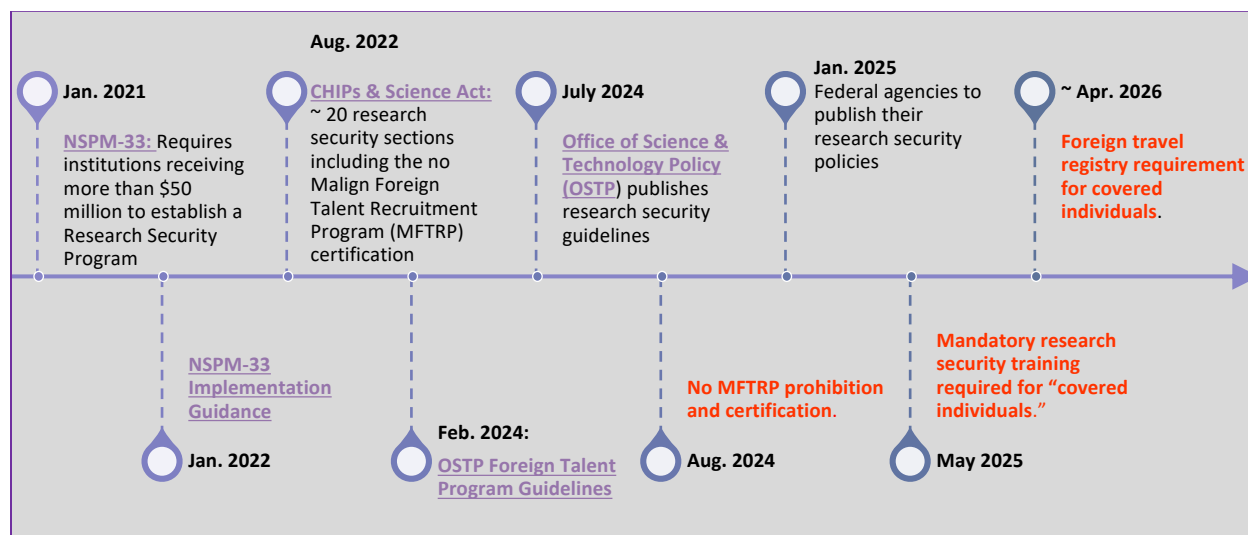
Research Security Risk Mitigation: Several federal funding agencies have published information on how they assess certain international risk factors, and which factors may warrant mitigation or impact funding opportunities. These matrices provide insight into what specific international activities bear risk to the agencies and to what degree. The risk criteria differ by each agency. Common areas of concern include, but are not limited to, foreign talent participation; foreign funding, positions, affiliations, and

associations with foreign countries of concern (FCOC) which are China (including Hong Kong), Iran, North Korea, and Russia; collaborations with restricted parties or denied entities; foreign patents; and co-authorships with individuals from or affiliated with FCOC for some agencies, etc.

This resource and summary matrix provide a general overview of the risk factors considered by each agency. The risk factors may be weighted differently by agency based on a range of factors including when the activity occurred. Most agencies are reviewing the past five years but may treat the risk factor differently if it occurred before or after the passage of the CHIPS & Science Act, August 9, 2022.

Research Security Regulations
&
Implementation Timeline

Jan. 2021

Aug. 2022

July 2024

Jan. 2025

~ Apr. 2026

NSPM-33: Requires institutions receiving more than $50 million to establish a Research Security Program

CHIPs & Science Act: ~ 20 research security sections including the no Malign Foreign Talent Recruitment Program (MFTRP) certification

Office of Science & Technology Policy (OSTP) publishes research security guidelines

Federal agencies to publish their research security policies

Foreign travel registry requirement for covered individuals.

NSPM-33 Implementation Guidance

No MFTRP prohibition and certification.

Mandatory research security training required for "covered individuals."

Jan. 2022

Feb. 2024: OSTP Foreign Talent Program Guidelines

Aug. 2024

May 2025

Research Security Training mandate: The federal government is requiring research security training. This mandate stems from President Trump's National Security Presidential Memo-33 (2021) and the CHIPs and Science Act (2022). Researchers have two training options: (1) a one-hour Northwestern-specific training meeting the required criterion or (2) a four-hour course developed by NSF. For questions, please contact the Export Controls & International Compliance team.

Access the Northwestern Research Security Training here. This one-hour training course is designed to provide a comprehensive understanding of research security. The training focuses on mitigating risks associated with foreign interference, proper disclosure of research information, international travel & shipping, cyber threats, and much more! The ECIC and Research Security Leadership Working Group developed an SOP to introduce the required research security training by the mandated deadline of May 1, 2025 for the DOE. Other agencies are expected to mandate the training in 2025 (view the SOP here). *The Office for Research highly recommends that all researchers applying for and receiving federal funding take the training*.

Foreign Travel: Northwestern is in the process of adapting its student international travel registry to meet the NSPM-33 requirements for covered individuals (an anticipated requirement in 2026). Northwestern currently has a system which is primarily used for student travel, but includes faculty and staff trip leaders. In addition, employees (faculty and staff regardless of citizenship) are highly encouraged to register their official travel to OFAC sanctioned countries. In the meantime, Northwestern has accepted awards that require travel registration, and the Office for Research uses this Smartsheet to review travel for export control and foreign influence considerations. The ECIC provides travel safety guidance, some of which is summarized here.

Export Control: Even though Northwestern is a fundamental research university, it has an export control program. Northwestern's export control policy and manual can be located on our website. Northwestern is not registered with the US Department of State Directorate of Defense Trade Controls and does not accept ITAR projects. Northwestern's programs comply with the Export Administration Regulations as well as regulations of the U.S. Department of Treasury Office of Foreign Assets Control. Vendors, research visitors, and research partners are vetted using Visual Compliance software to determine if they are a restricted party. Technology Control Plans (TCPs) are used when the sponsor needs to provide Northwestern with controlled inputs. The Export Control team offers a variety of export control training including in-person training, online training, videos, and FAQs.

Cybersecurity: The cybersecurity program on campus, managed by Northwestern's Information Security Office (ISO), is based on the NIST Cybersecurity Framework (NIST CSF) and conducts institutional security testing and monitoring in support of promoting the confidentiality, integrity, and availability of university systems and data. This program includes governance-level activities as well as active monitoring for information security incidents, vulnerability management, and management of incident response protocols. The ISO works with all distributed IT partners as well as faculty and investigators across campus to promote adoption of cybersecurity tools, provide education regarding university policies and information security frameworks, and consulting on system security plans to satisfy all requirements of granting agencies or other research sponsors. The cyber security controls and programs focus both on IT solutions and user behavior – how to practice good cyber hygiene to prevent cyber breaches.

Resources:

- Export Control Website
- International Collaborations
- Disclosure guidance
- Improper Foreign Influence
- Federal Agency Risk Reviews
- Foreign Talent Program Guidance

- Research Security Website
- Restricted Party Screenings
- International Travel Guidance
- OFAC Guidance
- International Shipping

Email the ECIC team at exportcontrols@northwestern.edu with any questions.