Research Security & Other Hot Topics in Research Compliance

Ben Vesper

Office of Research Compliance and Integrity

ORCI Areas of Oversight

Research Security

Increased federal focus on:

| Undisclosed foreign affiliations	Talent recruitment programs	Export controls	International collaborations	International support

Research Security Definition:

"Safeguarding the US research enterprise against the misappropriation of research and development to the detriment of national or economic security, while maintaining open, collaborative environment"

Updated training requirements for federal grant submissions
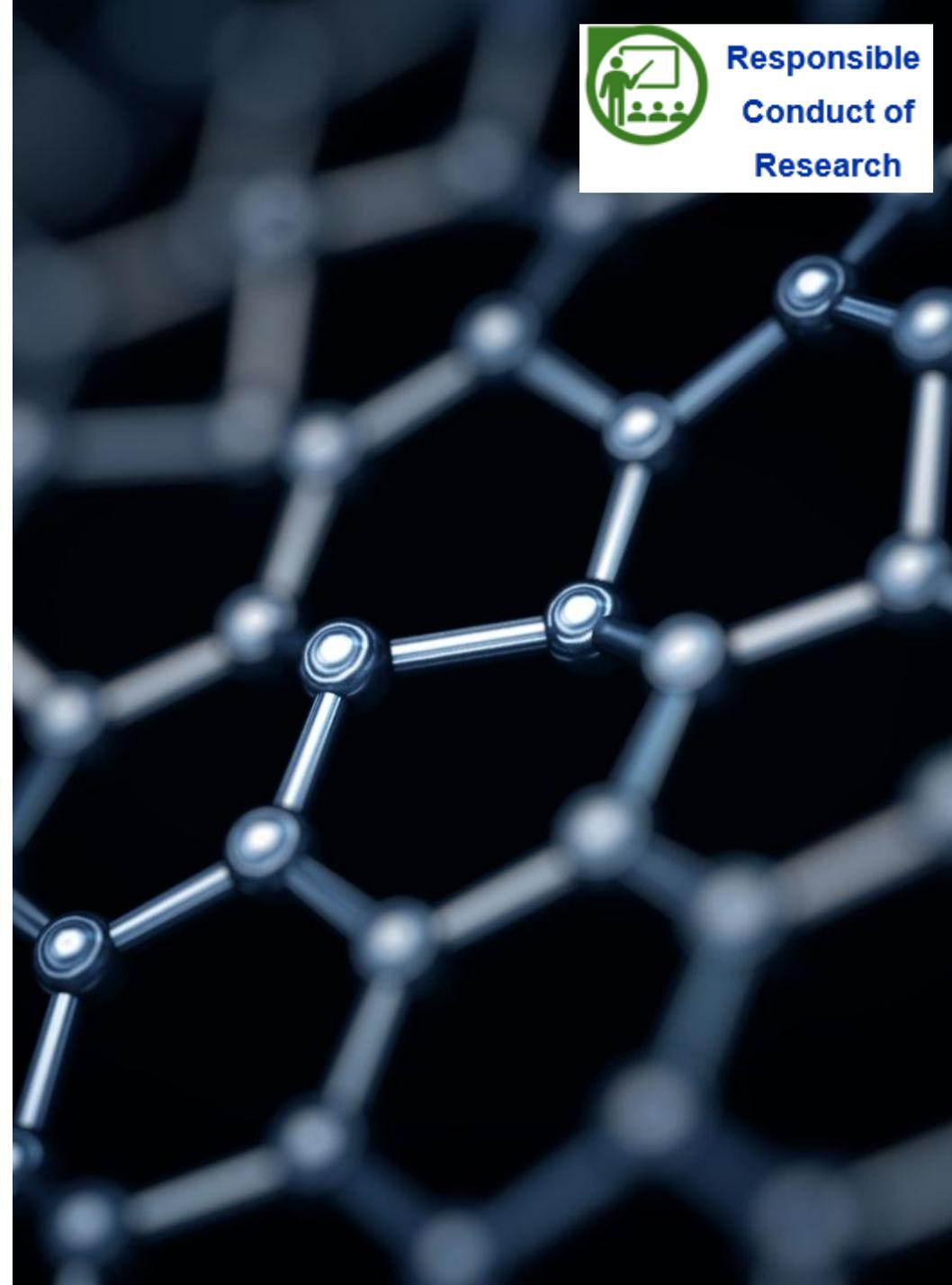
Research Security Training Requirements

Federal Agency	Who Must Train	Training Deadline	Continued Training Required on Award?	Implementation Date
NSF	PIs; Senior/Key Personnel	Within 1 year of grant submission or upon being added to award	Every 4 years	12/02/2025
NSF	Other Personnel	Within 60 days of being added to award	Every 4 years	12/02/2025
USDA	PIs; Senior/Key Personnel	Within 1 year of grant submission or when added to award	Annually	12/31/2025
USDA	Other Personnel	Within 60 days of being added to award	Annually	12/31/2025
NIH	PIs; Senior/Key Personnel	Within 1 year of grant submission or upon being added to award	Annually	5/25/2026
NASA	PIs; Co-Is with ≥10% effort	Within 1 year of grant submission or upon being added to award	Unclear Yet	8/5/2026
DOD	Not Yet Announced			

Research Security Training Overview

Modules

What is Research Security?

Disclosure Requirements

Manage and Mitigate Risk

International Collaboration

Time Commitment

Single Combined Course (1 hr)

OR

Four Individual Courses (4 hrs)

Delivery Platform

Online via CITI

Export Controls: What is an Export?

Shipping or hand-carrying goods out of the US

Electronic transmission out of the US (email, phone, fax, chat programs, cloud)

"Deemed export": Release of technology to a foreign national in the United States (supplying technical information, lab tours, presentations and discussions, etc.)

Export Controls: Regulations

Export Administration Regulations (EAR)	International Traffic in Arms Regulations (ITAR)	Office of Foreign Assets Control (OFAC)
• Dual-use civilian and military • Commerce Control List: Includes most commercial items (chemicals, biologics, telecommunications, software, computers, etc.)	• United States Munitions List: Includes technologies with inherently military properties • Defense articles, defense services, related technical data	• Prohibits transactions with certain countries and individuals • Broad-based restrictions

Regulations are updated frequently!

Export Controls: What Is Controlled?

- Controlled
  - Technologies
  - Transactions (shipping, payments)
  - Travel
  - Activities (lab tours, hiring of foreign nationals)

- Not Controlled
  - Information in public domain
  - Basic marketing descriptions
  - Artistic/non-technical publications
  - Information generally available to the public (published patents, educational materials related to catalog courses)
  - Information under the Fundamental Research Exclusion

Common Export Control Flags

High risk areas of research
- Computing, engineering, encryption, space and satellite technology, etc.

Restrictive clauses in contracts/agreements
- Publication restrictions
- Restrictions on participation of foreign nationals
- Restriction on access to materials/data

Foreign involvement
- International travel
- International shipping (including hand-carrying)
- Foreign collaborators
- Any work with sanctioned/restricted countries
- Deemed exports

Takeaway: Consult with ORCI prior to engaging in international work.

Drones

- Dec 2025 FCC changes restrict purchase and operation of foreign-sourced drones

- Foreign-sourced drones already in US before Dec 2025 can still be used if drone and data stay within US

- Purchasing new drone? See US government's Blue List

- **Reminder: GVSU approval needed for purchase and operation (SLT Policy 6.20)**

Research Conflicts of Interest

Increased scrutiny by federal agencies

Could be real or perceived

Types of Conflicts

- Financial conflicts of interest
- Conflicts of commitment
- Supervisory conflicts
- Personal conflicts

Development of management plan

Data Privacy & Sensitive Data

Expanding Regulatory Landscape

- International regulations (GDPR, etc.)
- State privacy laws

Long-standing Regulations

- HIPAA
- FERPA

Risks

- Cloud storage vulnerabilities
- Improper deidentification
- Re-identification
- Data sharing without agreements

Data Sharing Best Practices

- Utilize a Data Sharing/Use Agreement whenever possible
  - Outlines access, storage, destruction requirements

- Data leaving GVSU
  - Identifiable data: **Required**
  - Deidentified data: **Strongly recommended**

- Data sent to GVSU
  - At discretion of data owner, but **strongly recommended**

- Signatory authority for GVSU agreements lies with Vice Provost for Research and Innovation

- Contact ORCI for review/processing

AI in Human Subjects Research

Questions to Consider

- How is the AI interacting with participants?
- Is identifiable data used to train models?
- Does the participant understand their data will be used for AI purposes?
- What are the risks and biases associated with using the AI tool?

Best Practices

- Transparency to participants (clear consent language)
- Opt-in consent
- Use of deidentified data only whenever possible
- No sensitive personal information into AI models
- Use of AI models with Level III or IV data requires Academic Research Computing review to ensure appropriate security controls

Human Subjects Research

Questions?

Phone: 616-331-3197
Email: rci@gvsu.edu
Website: www.gvsu.edu/rci/