



# UMB Research Security

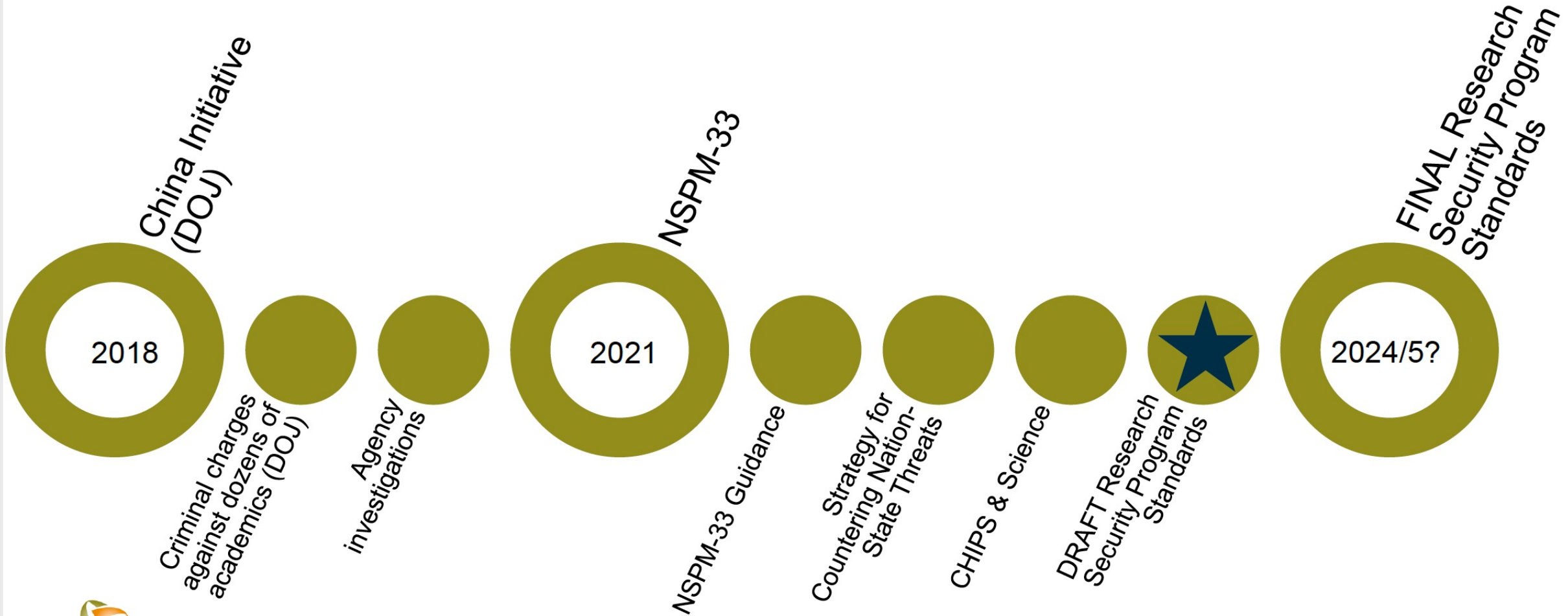
Hiromi Sanders

Research Security Manager

# Agenda

- Foreign Influence Timeline
  - Chips Act of 2022
  - National Security Presidential Memorandum 33
- Research Security at UMB

# Timeline



# CHIPS Act of 2022

The Act contains a variety of provisions related to research ethics, foreign talent recruitment, restrictions on Confucius Institutes, and establishing new research security initiatives in the Department of Energy, National Institutes of Standards and Technology, and the National Science Foundation:

- **Section 10634** requires institutions and researchers to certify training has occurred as part of the application for a research award.
- **Section 10337** updated responsible conduct in research training to raise awareness of potential security threats, and federal export control, disclosure, and reporting requirements.
- **Section 10339B** requires institutions to annually provide a summary report to NSF current financial support, including gifts and contracts, of \$50,000 and above from foreign countries of concern.
- **Section 10631 and 10632** prohibits all agency personnel from participating in a malign foreign talent recruitment program and required OSTP to distribute a uniform set of guidelines for federal research agencies regarding foreign talent recruitment programs. Also required individuals to certify they are not part of a malign foreign talent program and that policies developed should not prohibit activities related to international collaborations.

# National Security Presidential Memorandum 33

Directs action to strengthen protections of U.S. Government-supported research and development against foreign government interference and exploitation.

While maintaining an open environment to foster research discoveries and innovation, steps will be taken to protect intellectual capital, discourage research misappropriation, and ensure responsible management of taxpayer dollars. This includes steps to ensure that participants fully disclose information that can reveal potential conflicts of interest and conflicts of commitment.

## **Research Security** (as defined in NSPM-33):

Safeguarding the research enterprise against the misappropriation of research and development to the detriment of national or economic security, related violations of research integrity, and foreign government interference.

- Disclosure Requirements and Standardization
- Digital Persistent Identifiers
- Research Security Program

# NSPM-33: Research Security Program

*NSPM-33 directs that by January 14, 2022, “heads of funding agencies shall require that research institutions receiving Federal science and engineering support in excess of 50 million dollars per year certify to the funding agency that the institution has established and operates a research security program.*

*Institutional research security programs should include elements of:*

- *Cybersecurity*
- *Foreign Travel Security*
- *Research Security Training*
- *Export Control Training (as appropriate)*

# Research Security @ UMB

*NSPM-33: Qualifying research organizations should establish a research security program as soon as possible, but should be provided one year from date of issuance of the formal requirement to comply.*

**Final Research Security Program Standards (2024-5?)**

# UMB Coordinating Functions

- Disclosures
  - Sponsor
  - University
- Policies and Standard Operating Procedures
- Digital Persistent Identifier
- Research Security Program
  - Sponsored Research: Proposal and Award Review
- Responsible Conduct of Research
- Research Security Information Hub and Point-of-Contact



# Disclosures

Heightened scrutiny of foreign influence has led federal agencies to request additional information from researchers. A renewed effort is now underway to ensure that existing requirements to disclose specific information are known, understood, and followed.

The Feds have worked to develop consistent disclosure requirements and to develop proposed common disclosure forms for the Biographical Sketch and Current and Pending (Other) Support.

## **UMB**

- Conflicts of Interest
- Conflicts of Commitment

## **Sponsor**

- Proposals
  - Biographical Sketch; Current/Pending (Other) Support
- Annual reports
- Updates

# Sponsor Disclosures

NSTC Pre-award and Post-award Disclosures  
 Relating to the Biographical Sketch and Current and Pending (Other) Support  
 May 20, 2024

Table Key  
 \* = for new support only  
 ♦ = If undisclosed at the time of application submission

Type of Activity	Biographical Sketch	Current & Pending (Other) Support	Facilities, Equipment & Other Resources	Project Reports	Post-Award Information Term & Condition	Disclosure Not Required
Professional Preparation (e.g., education and training)	✓					
Academic, professional, or institutional appointments and positions, whether or not remuneration is received, and whether full-time, part-time, or voluntary	✓					
A list of products that demonstrate the individual's qualifications to carry out the project as proposed	✓					

NSTC Pre-award and Post-award Disclosures  
 Relating to the Biographical Sketch and Current and Pending (Other) Support  
 May 20, 2024

Type of Activity	Biographical Sketch	Current & Pending (Other) Support	Facilities, Equipment & Other Resources	Project Reports	Post-Award Information Term & Condition	Disclosure Not Required
Current and pending (other) support – (a) All resources made available, or expected to be made available, to an individual in support of the individual's research and development efforts, regardless of (i) whether the source is foreign or domestic; (ii) whether the resource is made available through the entity applying for a research and development award or directly to the individual; or (iii) whether the resource has monetary value; and (b) Includes in-kind contributions and directly supporting the individual's research and development efforts, such as the provision of office or laboratory space, equipment, supplies, employees, or students.		✓		✓*	✓*	
In-kind contributions with an estimated dollar value of \$5000 or more that support the research activity for use on the project/proposal being proposed						
In-kind contributions (i) with an estimated dollar value of \$5000 or more, (ii) not intended for use on the project/proposal being proposed, and (iii) have an associated time commitment	✓	✓	✓*	✓*		

# Malign/Foreign Talent Recruitment Programs and Certifications

Many countries sponsor talent recruitment programs to attract researchers in targeted fields, utilizing legitimate, transparent mechanisms of talent recruitment, including use of research fellowships, student and scholar exchanges, and grants.

However, some programs provide direction or levy requirements, including through language in binding contracts, that create conflicts of interest and/or conflicts of commitment for researchers; inappropriate transfers of federally-funded research to foreign governments; violations of export control laws and; theft of intellectual property.

Foreign talent recruitment programs are characterized by their activities, features, intents, or requirements.

## Federal Guidelines

**Must disclose participation in FTRPs and certify they are not a party to a MFTRP  
Certifications required at time of each proposal and annually thereafter.**

\*University Policy – Pending Review

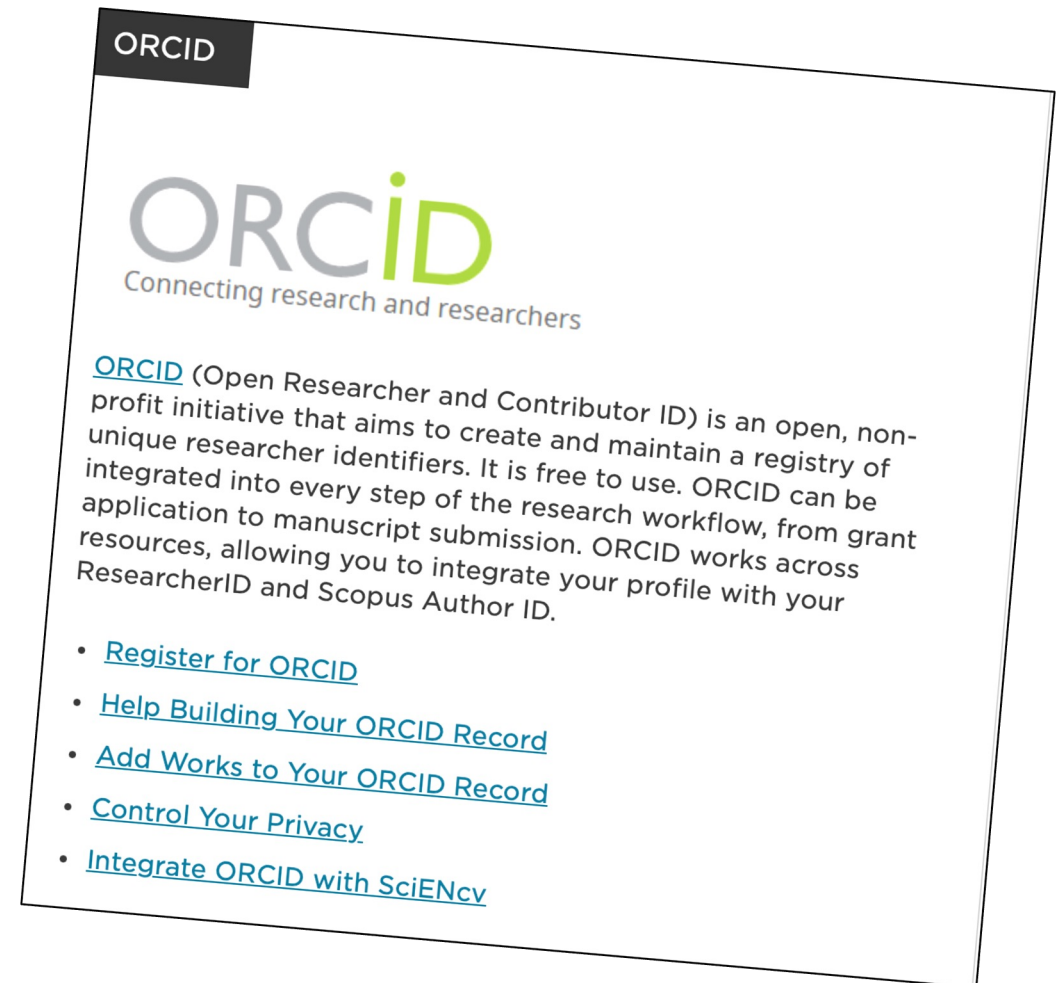
\*SOP for Certifications – SPA AVP announcement May 4, 2024



# Digital Persistent Identifier: ORCID

*NSPM-33: “funding agencies shall establish policies regarding requirements for individual researchers supported by or working on any Federal research grant to be registered with a service that provides a digital persistent identifier for that individual.”*

Health Sciences Human Services Library offers education around identifiers and has organized “ORCID Drives” in the past.



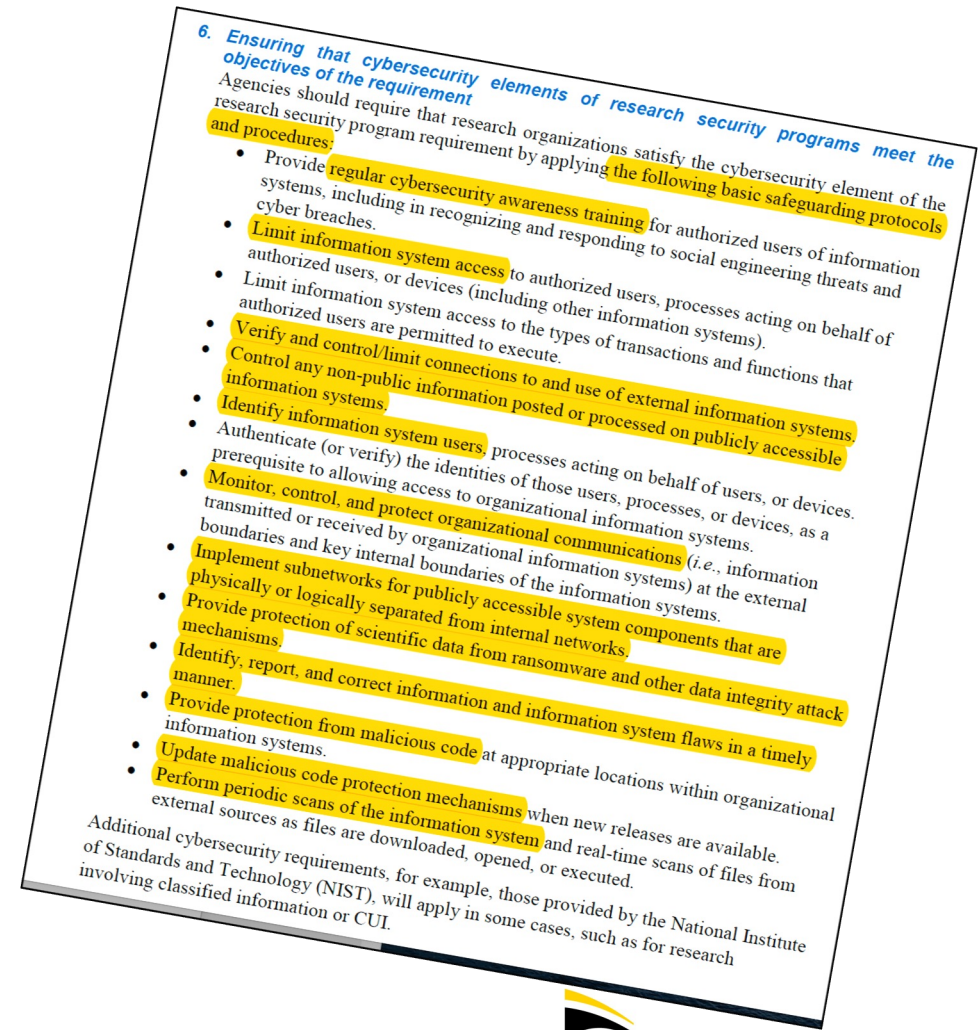
The image shows a screenshot of the ORCID website. At the top left, there is a black box with the word "ORCID" in white. Below this is the ORCID logo, which consists of the word "ORCID" in a sans-serif font, with the "i" in "ID" being green. Underneath the logo is the tagline "Connecting research and researchers". A paragraph of text follows, explaining that ORCID (Open Researcher and Contributor ID) is an open, non-profit initiative that aims to create and maintain a registry of unique researcher identifiers. It is free to use and can be integrated into every step of the research workflow, from grant application to manuscript submission. ORCID works across resources, allowing you to integrate your profile with your ResearcherID and Scopus Author ID. Below the paragraph is a list of five links, each preceded by a bullet point:

- [Register for ORCID](#)
- [Help Building Your ORCID Record](#)
- [Add Works to Your ORCID Record](#)
- [Control Your Privacy](#)
- [Integrate ORCID with SciENcv](#)

# Cybersecurity

*NSPM-33: satisfy the cybersecurity element of the research security program by applying basic safeguarding protocols and procedures as described in NSPM-33.*

- CITS has launched the Secure Research Environment (SRE), a new centralized virtual environment designed to protect sensitive and restricted research data.
- Software programs and tools available to conduct research and analyses. Secure virtual desktop environments and custom compute configurations allow access to sensitive data under a higher level of control and data protection.



# Research Security Training

*NSPM-33: provide training to relevant personnel on research security threat awareness and identification, including insider threat training where applicable.*

The U.S. National Science Foundation, in partnership with the NIH, DOE, and DOD, is sharing online research security training for the research community.

UMB will offer this research security training to comply with the Research Security Program requirements of NSPM-33.

**> Module 1: What is Research Security?**  
Learn key concepts of research security and how to recognize situations that may indicate undue foreign influence. Understand the regulatory landscape that shapes research security and discover what you can do to safeguard the core values that underpin U.S. academic research.  
[Start module 1](#)

**> Module 2: Disclosure**  
Learn about federal funding agency disclosure requirements, including types of information that must be disclosed, how that information is used, and why such disclosures are fundamental to safeguarding the U.S. research enterprise from foreign government interference and exploitation.  
[Start module 2](#)

**> Module 3: Manage and Mitigate Risk**  
Learn to identify types of international collaborative research and professional activities, associated potential risks, and strategies and best practices for managing and mitigating such risk. Learner experience will be customized based on their role as either a researcher or administrator.  
[Start module 3](#)

**> Module 4: International Collaboration**  
Learn about the role of principled international collaboration in U.S. science, innovation and economic competitiveness. Discover how to balance principled international collaboration with research security concerns, as well as how to foster an open, welcoming research environment that fulfills research security needs.  
[Start module 4](#)

# Export Controls Training

*NSPM-33: Agencies should require that research organizations conducting R&D that is subject to export control restrictions provide training to relevant personnel on requirements and processes for reviewing foreign sponsors, collaborators and partnerships, and for ensuring compliance with Federal export control requirements and restricted entities lists.*

## **UMB must review for:**

- Restricted/Prohibited parties (organizations and individuals)
- Country sanctions
  - Comprehensive Sanctions: **Cuba, North Korea, Iran, Syria, and Regions of Ukraine (Crimea, Donetsk and Luhansk)**
  - “Countries of concern” (NSPM-33, CHIPS act, etc.): **China, Russia, North Korea, and Iran**
  - [OFAC Sanctions Programs](#)

# Sponsored Research: Proposal and Award Review

- International Research
  - Sponsors
  - Collaborators
  - Consultants
  - Subrecipients
- International shipments
- Services to foreign nationals/entities
  - Consulting; Teaching/Instruction/Training
- International travel
  - Destination(s) determine what controls/regulations apply
- Contract terms containing:
  - Confidentiality restrictions
  - Publication/dissemination restrictions on techniques or processes
  - Restrictions on the participation of foreign nationals



# Sponsored Research: Proposal and Award Review

Incorporation by reference of Federal Acquisition Regulations (FARs), agency specific FARs, or other federal regulations, which impose specific controls:

- **FAR 52.227-17 (Rights in Data – Special Works)**  
Prevents the release, distribution, and publication of any data originally produced in the performance of the award.
- **DFAR 252.204-7000 (Disclosure of Information)**  
Contractor shall not release to anyone outside the Contractor's organization any unclassified information, regardless of medium, pertaining to any part of this contract or any program related to this contract.
- **DFAR 252.204-7008 (Compliance with Safeguarding Covered Defense Information Controls)**  
The security requirements required by contract clause 252.204–7012, Covered Defense Information and Cyber Incident Reporting, shall be implemented for all covered defense information on all covered contractor information systems that support the performance of this contract.
- **ARL 52.004-4400 (Foreign Nationals Performing Under Contract)**  
In accordance with Title 8 U.S.C. 1324a, local Foreign Disclosure Officers (FDOs) may approve access by foreign nationals working on unclassified public domain contracts for the duration of the contract, provided the foreign nationals have appropriate work authorization documentation.

# Foreign Travel Security

*Nspm-33: maintain international travel policies; policies should include an organizational record of covered international travel by faculty and staff, a disclosure and authorization requirement in advance of international travel, security briefings, assistance with electronic device security (smartphones, laptops, etc.), and pre-registration requirements.*

UMB maintains international travel policies for traveling internationally for UMB business and provides services such as pre-departure security briefings, assistance with electronic device security and export controls, and research security briefings.

The screenshot shows a webpage titled "Research and Development". On the left is a navigation menu with the following items: Investigator Toolkit, Clinical Trials and Corporate Contracts, Sponsored Programs Administration, Technology Transfer-UM Ventures, UMB BioPark, Export Compliance, Kuail Research, UMB Research Security Program, Cybersecurity, Export Controls, International Travel (highlighted in yellow), Research Security Training, Foreign Talent Recruitment Programs, and Contact Us. The main content area is titled "International Travel" and contains the following text:

**NSPM-33 Directive:** Agencies should require that research organizations maintain international travel policies for faculty and staff traveling for organization business, teaching, conference attendance, research purposes, or any offers of sponsored travel that would put a person at risk. Such policies should include an organizational record of covered international travel by faculty and staff and, as appropriate, a disclosure and authorization requirement in advance of international travel, security briefings, assistance with electronic device security (smartphones, laptops, etc.), and pre-registration requirements.

UMB maintains international travel policies for employees, nonemployees, and students traveling internationally for UMB business and provides services such as pre-departure security briefings, assistance with electronic device security and export controls, and research security briefings.

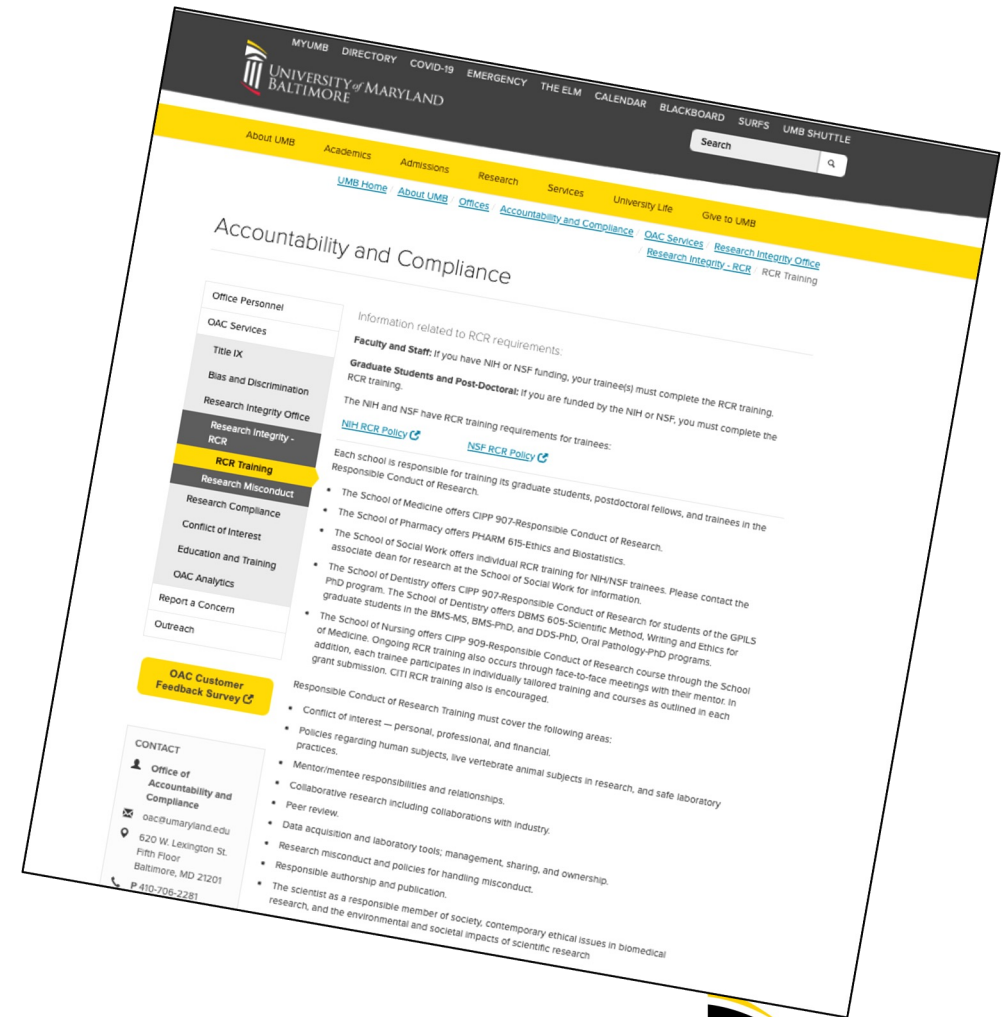
Individuals traveling internationally for UMB business or with UMB assets are responsible for complying with export control laws and regulations. International travel may be subject to export control regulations depending on the travel destination, hardware, software, and/or technical data the traveler carries. The RSM and ECO review UMB employee, nonemployee, and student international travel to assess potential export control considerations, including export licensing requirements for university-owned samples, equipment, software, or technology employees intend to hand-carry or ship separately to their foreign destination.

ORD partners with the UMB International Operations (IO) department to access information regarding international travel and the Concur travel system to ensure that employees, nonemployees, and students receive adequate information regarding export controls and research security before their travels. Visit the [Global Hub](#) for detailed travel information, including International travel policies and procedures, pre-departure preparation, and international travel FAQs. Appropriate approval of Business Travel is required before commencement of the Business Travel as described in [Procedure on Business Travel for UMB Employees PDF](#) and [Procedure on Business Travel for Nonemployees PDF](#).

# Responsible Conduct of Research: Research Security

*NSPM-33: Agencies should require that, as part of their research security programs, research organizations provide training to relevant personnel on research security threat awareness and identification, including insider threat training where applicable.*

The [Research Integrity Office](#) serves UMB by providing education/training and investigative services to the campus community on Research Integrity, Responsible Conduct of Research, and Research Misconduct.



More to come....

# Research Security Information Hub

Research and Development

Investigator Toolkit  
Clinical Trials and Corporate Contracts  
**Sponsored Programs Administration**  
Orientation to Sponsored Programs  
Alphabetical Index of Key Topics  
Award Management  
Budgets and Expenses  
Collaborations and Subrecipients  
Developing Proposals  
Find Funding Opportunities  
Forms  
Research and Development Policies and Procedures  
Research Administration Training  
Sponsor Notices  
SPA/SPAC update meetings  
SPA Staff  
SPA Contact Us  
SPA Notices Archive  
Technology Transfer-UM Ventures  
UM BioPark  
Export Compliance  
Kuali Research  
**UMB Research Security Program**  
Contact Us

## Sponsored Programs Administration

Throughout the life of your proposal and award, Sponsored Programs Administration (SPA) provides oversight and administrative support to investigators and departmental administrators.

UMB investigators were awarded \$563 million in research, service, and training awards in Fiscal Year 2023. SPA works with you to submit competitive proposals, negotiate agreements, and navigate the world of sponsored programs administration.

[Contact Us](#)

## FREQUENTLY USED LINKS

- Contact Your SPA Team
- Forms
- Kuali Research log in
- Kuali Build log in (forms)
- Institutional data and rates
- Salary caps and stipends

## Notices, Updates, and Reminders

**NIH Resubmission Proposals - Change effective May 25:** Effective May 25, 2024, do not use any markups to identify changes in Resubmission applications. The new instructions are: Changes made to a Resubmission application should only be outlined in the Introduction attachment. The introduction must include a summary of substantial additions, deletions, and changes to the application. It must also include a response to weaknesses raised in the Summary Statement. [NOT-00-24-051](#)

**NIH Salary Cap:** Begin using the new salary cap of \$221,900 for all NIH proposals. For active awards where the salary cap applies and if adequate funds are available, you may rebudget funds to accommodate the current Executive Level II salary level. \$221,900

Additional information:

- [DDG, OIG](#) \$244,090
- [USDA, NIFA](#) [RFP](#) \$191,900
- [Patient-Centered Outcomes Research Institute \(PCORI\)](#) \$200,000

[Patient-Centered Outcomes Research Institute \(PCORI\)](#) for April 10, 2024 (Wednesday) 1:00-3:00 pm

[Kuali Research Proposal Training registration](#) for New Users

April 18 (Thursday) 1:00 - 2:30 pm - [Brownbag on Subaward Requests - Reminders and Tips](#)

April 23 (Tuesday) Noon - 1:00 pm

[SPA Notices Archive:](#) Reminders, updates, and announcements from past months

[Mondays 10:00-11:30 am](#)

[Wednesdays 2:00-3:30 pm](#)

SPA Office Hours:

Research and Development

Investigator Toolkit  
Clinical Trials and Corporate Contracts  
Sponsored Programs Administration  
Technology Transfer-UM Ventures  
UM BioPark  
Export Compliance  
Kuali Research  
**UMB Research Security Program**  
Cybersecurity  
Export Controls  
International Travel  
Research Security Training  
Contact Us

## UMB Research Security Program

The University of Maryland Baltimore's research efforts extend from bench to bedside, globally and locally. UMB Investigators often plan and participate in projects that involve international collaborators, foreign travel, or short- or long-term research or training outside the United States.

Increased concern has been expressed through both federal legislative actions and agency regulations about protecting national security and U.S. economic interests when taxpayer dollars fund the University's work. UMB investigators must be responsible stewards of these funds and ensure that UMB is mindful of protecting intellectual property and know-how, as required by funding terms. UMB is committed to protecting U.S. research and innovation and complying with U.S. Government regulations.

**Research security** – Safeguarding the research enterprise against the misappropriation of research and development to the detriment of national or economic security, related violations of research integrity, and foreign government interference.

## National Security Presidential Memorandum 33 (NSPM-33)

NSPM-33 established a national security policy for U.S. Government-supported Research & Development. The purpose of NSPM-33 is to strengthen protections of U.S. Government-supported R&D against foreign government interference and misappropriation while maintaining an open environment to foster research discoveries and innovation that benefit the United States and the world.

Five key areas addressed in NSPM-33

- Disclosure Requirements and Standardization
- Digital Persistent Identifiers
- Consequences for Violation of Disclosure Requirements
- Information Sharing
- Research Security Programs

NSPM-33 requires a certification from research organizations awarded more than \$50 million per year in total Federal research funding that they have implemented a research security program that includes the four elements highlighted in NSPM-33:

## Research Security Program Elements

**CYBERSECURITY**  
Safeguarding protocols and procedures for

**EXPORT CONTROLS**  
Processes and training for research and

**INTERNATIONAL TRAVEL**  
Disclosure of travel, training, agreements

**TRAINING**  
Research security threat awareness.

**CONTACT**  
620 W. Lexington St.  
Fourth Floor  
Baltimore, MD 21201  
P 410-706-6723

UMB Point of Contact: [Research Security Manager](#)



# Ask Hiromi, Ask Often.

Questions?

Contact:

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