NSF SECURE Center Research Security Briefing

Vol. 1 No. 10: September 4, 2025

The SECURE Center distributes research security briefings and timely alerts via its listserv. The Briefing provides a centralized resource for research security-related information, including new statutory and research funding agency requirements, new or updated federal and community resources, and significant news items and scholarly works. The Center will also assess and provide commentary, interpretation, or implementation considerations on new requirements, notices and resources, working with higher education associations, legal partners, or agencies as needed.

Contents

Federal Agency News & Updates

Maximizing and Safeguarding NIH's Investment in Foreign Collaborations:
On August 25, 2025, National Institutes of Health (NIH) Director, Dr. Jay Bhattacharya issued a statement delineating the agency's mission in the context of international activities, specifying that NIH "conducts and supports international research because responsible global collaboration can drive scientific progress. However, NIH is not a foreign aid organization and support of international research should deliver both scientific and taxpayer value, as NIH is also tasked with being good stewards of U.S. taxpayer dollars." Therefore, NIH is adopting two fundamental principles regarding research activities conducted outside the U.S.:

1. "All research supported at international sites should have a clear scientific rationale to be conducted in a foreign country rather than in the United States."

2. "All research supported at international sites should have direct potential to generate knowledge applicable to understanding, improving, or protecting the health of Americans."

Professional Association Resources & Meeting Reports

NCURA Annual Meeting Reports

At the 67th annual NCURA meeting in Washington DC, August 10 - 13, 2025, several events involved or were related to research security. Presenters from these sessions have provided a post-meeting summary.

Building Capacity to Manage RISC: Investing in Research Integrity, Security, and Compliance at Mid-Sized and Smaller MSIs and HBCUs

Presenters:

- Dr. Melissa Harrington, PhD, Assoc. Vice President for Research, Delaware State University

- LaKeisha Harris, PhD, Dean, School of Graduate Studies, University of Maryland Eastern Shore

- Michael Miller, Asst. Director of Research Security and Integrity, Office of Research Protections & Compliance, University of Maryland Baltimore County

- Keyshawn Moncrieffe, PhD, Special Assistant (Business & Public Affairs), Research & Economic Development, Morgan State University

Summary provided by the panelists along with Christine Mallinson, PhD, Assistant Vice President for Research and Scholarly Impact, University of Maryland Baltimore County, Grant Principal Investigator.

"Building Capacity to Manage RISC: Investing in Research Integrity, Security, and Compliance at UMBC through Practices, Processes, and Partnerships" is a project funded by a 5-year award from the National Science Foundation. In a partnership among the University of Maryland, Baltimore County (UMBC), University of Maryland, Eastern Shore (UMES), Morgan State University (MSU) and Delaware State University (DSU), the project is developing best practices, guidance and training resources for building compliant yet flexible research security programs for smaller to mid-sized universities.

Following an overview of the federal regulatory landscape, the four partnering institutions discussed how they are implementing compliance protocols to meet federal requirements. For example, MSU described their phased implementation plan—cybersecurity, export controls, foreign travel, and research security—emphasizing project management structures and communication strategies. Each institution emphasized a need for charting clear goals for training and policy alignment and working with other units.

The presenters also identified several key issues facing smaller to mid-sized universities and colleges in today's challenging regulatory environment, including challenges tied to international collaborations, export controls, and travel oversight. Both DSU and UMES discussed barriers and

opportunities for compliance infrastructure at smaller HBCUs. For example, although resource constraints and complex regulatory changes are a common challenge, opportunities lie in cross-institutional collaboration, in developing adaptable materials and training resources, and in building strong regional and national networks, all of which are key goals of the current collaborative project.

Navigating Security, Openness, and Inclusion in Global Research

Presenters:

- Lori Schultz, Asst. VP for Research Administration, Colorado State University (in-person)

- David Ribes (virtual)

This session explored how universities and researchers can balance the demands of research security, open science, and inclusive collaboration in an increasingly global research environment. David's contributions focused on strategies for navigating security and openness, developing new languages for inclusion, and supporting both domestic and international partnerships. Lori focused on how research administrators help researchers navigate both policies and laws that inform openness and security like data management and sharing, export control, research security, and federal/institutional anti-discrimination requirements. Drawing from policy analysis and case studies, we examined how institutions can uphold integrity and compliance while fostering equitable and collaborative research practices. Participants spanned research organizations and institutions of higher education in the United States and in other countries. A lively Q&A followed in which participants expressed interest in the SECURE Values Areas and appreciation for the weekly briefings. Attendees also discussed their concerns about how the current federal landscape will change what makes research work: funding, inclusion of international partners, student enrollment, and more.

Research Security Programs: Agency Implementations and the Road to Compliance

Presenters:

- Elizabeth Peloso, Sr. Vice Provost & Sr. Assoc. Vice President for Research at the University of Pennsylvania

- Kristin West, Director for Research Ethics & Compliance at COGR

A session on recent research security updates and institutional efforts in establishing research security programs was provided. The presentation covered the following new agency requirements:

(a) NSF's new research security training and research security assessment/recipient supporting documentation requirements from Important Notice 149 [also see SECURE Center Research Security Briefing No. 3];

(b) NIH's new disclosure requirements training set forth in NOT-OD-25-133 [also see SECURE Center Research Security Briefing No.4]; and

(c) the research security requirements in USDA's "America First Memorandum for USDA Arrangements and Research Security" [also see SECURE Center Research Security Briefing No.4].

Presenters also discussed research security implications of the Department of Justice's recent

[regulations](#) on the transfer of U.S. persons' bulk sensitive personal data to countries of concern and Covered Persons and the Executive Order on Improving the [Safety and Security of Biological Research](#). The presenters and the audience then engaged in a robust discussion of challenges academic institutions face in this area stemming from lack of agency harmonization and a continuing/worsening lack of resources, as well as concerns about whether the federal government is truly supportive of continuing international collaborations and institutions' willingness to engage in such collaborations given the ever-increasing barriers to participation.

Research Security and Export Controls for the Research Administrator

Presenters:

- Jessica Buchanan, Senior Director of Research Security and Export Compliance at the University of Pennsylvania

- John Jenkins, Director of Research Security at Princeton University

- Elizabeth Peloso, Sr. Vice Provost & Sr. Assoc. Vice President for Research at the University of Pennsylvania

A workshop was conducted in which participants explored the overlap between Export Controls and Research Security as well as where they diverge. In addition to describing the elements of Research Security programs, the workshop participants explored their role, as a research administrator, in maintaining research security at their institutions. Participants also joined in discussions on how best to leverage existing practices and resources at their institution to support fledgling Research Security programs, as well as discussion of roles and responsibilities across the institution for implementing Research Security programs. With participants from both research-intensive institutions as well as small, primarily undergraduate institutions, the workshop included discussions around practices and strategies research administrators can use to assist in supporting research security at their institutions.

Additional NCURA details and meeting program information are available [here](#).

Research Security News & Reports

Please note, articles linked below may require a subscription to view.
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The National Academies Releases the Report, *Simplifying Research Regulations and Policies: Optimizing American Science*, Addresses Research Security

The National Academies Committee on Improving Regulatory Efficiency and Reducing Administrative Workload to Strengthen Competitiveness and Productivity of U.S. Research published its report, *[Simplifying Research Regulations and Policies: Optimizing American Science](#)* on September 3, 2025. The Committee "conducted an expedited study to examine federal research regulations and identify ways to improve regulatory processes and administrative tasks, reduce or eliminate unnecessary

work, and modify and remove policies and regulations that have outlived their purpose while maintaining necessary and appropriate integrity, accountability, and oversight."

The report highlights "a dramatic rise in regulations, policies, and requirements over time" and "excessive, uncoordinated, and duplicative policies and regulations surrounding research" that "are hampering progress and jeopardizing American scientific competitiveness". Many options are presented for the federal government to address these growing requirements and issues with coordination and duplication, as well as the pros and cons of each option.

Topics addressed include:

- Grant Proposals and Management

- Research Misconduct

- Financial Conflict of Interest in Research

- Protecting Research Assets, which includes Research Security, Export Controls, and Cybersecurity and Data Management

- Research Involving Biological Agents

- Human Subjects Research and,

- Research Using Nonhuman Animals

Overarching options to address issues include:

- Establishing a permanent career role in OMB [Office of Management and Budget] that is charged with coordinating cross-agency requirements that affect federally funded academic research and has the authority to ensure agency coordination, working collaboratively with OIRA [Office of Information and Regulatory Affairs], OSTP [Office of Science and Technology Policy], and using the NSTC [National Science and Technology Council] to institute harmonization.

- Reauthorizing the creation of a Research Policy Board within OIRA, granting it similar composition and authorities to those outlined in the 21st Century Cures Act.

- Using the Federal Demonstration Partnership (FDP) to explore innovative ideas and practices through pilot programs, establishing low-risk processes for testing innovative approaches to increase harmonization and use of approaches that are tiered to risk.

Among the options to protect research assets are:

- Implement the National Security Presidential Memorandum-33 (NSPM-33) common disclosure forms and disclosure table, without deviation, as the primary means to identify and address Conflicts of Commitment (COCs) and develop federal-wide FAQs via the interagency working group; in addition, use the Science Experts Network Curriculum Vitae (SciENcv) system, persistent identifiers (PIDs), and application programming interfaces (APIs) across research funding agencies.

- Establish common principles for agency research security risk reviews for fundamental research.

- Continue prior efforts, chiefly the Export Controls Reform Initiative, to streamline and clarify export controls and reduce associated administrative work, with representation from the academic research community and expedite licensing processes for low-risk controlled research.

- Adapt cybersecurity requirements for university settings: direct NIST (National Institute of Standards and Technology], in collaboration with OSTP and the broader research community, to undertake a comprehensive review of cybersecurity controls as they apply to institutions of higher education and make appropriate modifications to ensure alignment with the academic research environment.

The report notes the efforts of the SECURE Program, Center and Analytics, including that "This organization, established in September 2024 and now known as the SECURE Program, including the SECURE Center and SECURE Analytics, serves to connect the research community and collectively design and develop resources and tools to address research security risks and federal agency research security requirements. Although it is relatively new and its evaluation is ongoing, the SECURE Center could be a model for community codesigned resources that facilitate coordinated implementation across institutions." Related to the Center, the report includes the following option:

- Use the Safeguarding the Entire Community of the U.S. Research Ecosystem (SECURE) Center as an interactive research security information hub to keep the community current on the latest information and provide resources to facilitate consistent implementation of research security requirements across institutions.

And within the option to "Amend the CHIPS and Science Act to allow for 'just-in-time' research security training," that to reduce the annual training hours required by current policies, agencies could subscribe to the SECURE Center's condensed research security training module and broadly accept and apply an investigator's completion of said module as satisfying the agency's security training requirement. The full report can be found here.

NSF SECURE Analytics Releases Webinar on China's Science & Technology Shift
(August 8, 2025): "The government of China is overhauling its science and technology (S&T) ecosystem in ways that are sharpening geostrategic rivalry and impacting the risk portfolios managed by research security professionals. A new NSF SECURE Analytics Advisory outlines the geopolitical and security stakes for the United States. (more)

Research Security-Related Events & Conferences

National Academies "Assessing Research Security Efforts in Higher Education -Meeting of Experts 2"

Following initial meetings in September 2024 and a two-day public workshop in May 2025 and a meeting in September 2024, the National Academies will be holding another "Assessing Research Security Efforts in Higher Education – Meeting of Experts" session on Thursday, September 4, 2025. Convened by the Department of Defense, subject matter experts from universities and federal

agencies will gather to discuss research security efforts, including potential measures of effectiveness. The meeting will be held in-person in Washington DC, with some portions available via webcast (registration required). (more)

FDP Virtual Meeting:

Registration is now open for the Federal Demonstration Partnership (FDP) Virtual September 2025 meeting, taking place Monday, September 15th (11 AM ET – 5 PM ET), Tuesday, September 16th (11 AM ET – 5 PM ET) and Wednesday, September 17th (11 AM ET - 2 PM ET). While the agenda is still being finalized, potential sessions include:

- Federal Research Security

- Research Security – Update on Cybersecurity Framework

- Updates from the NSF SECURE Center

COGR October Meeting:

Registration is now open for our October 23-24, 2025 meeting in Washington D.C. at the Washington Marriott in Georgetown. **"Early Bird" registration price is available until September 16th**. (more) Preliminary agenda topics include:

- Simplifying Research Regulations and Policies: Optimizing American Science: A NASEM Report (also see above)

- Cybersecurity & Other Research Security Implementation Updates

- Legislative Update & Outlook

Save the Date for ASCE 2026:

Mark your calendars now for the 2026 Academic Security and Counter Exploitation Program. Next year is the 10th anniversary of the largest research security conference in the world: February 24 - 26, 2026. through noon (CST) on August 31, 2025. **Proposal deadline extension: Proposals are now being accepted through September 12, 2025** (more)

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