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NOV 13, 2025



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# Research Security and Export Controls

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# Learning Objectives

- Understand federal research security requirements and their implications for university compliance.
- Prepare for institutional changes by learning about upcoming training, system updates, and agency-specific mandates affecting research operations.
- Identify areas of connectivity and support for the research community in navigating the requirements.

# Agenda

- Research security overview
- Federal requirements
- Research security training
- Foreign Talent Recruitment Programs (including Malign)
- Export control

# Research Security Matters!

## THE WALL STREET JOURNAL.

English Edition | February 27, 2020 | Print Edition | Video

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### U.S. China's Funding of U.S. Researchers Raises Red Flags

Academics don't always disclose the funding, adding to concerns about national security

### American universities are a soft target for China's spies, say U.S. intelligence officials

NBC News · 25 days ago

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Bloomberg proposes limited debt forgiveness, tuition-free college

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### Florida Lawmakers Probe 'Foreign Meddling' in Research

Federal officials have been scrutinizing foreign research ties for evidence of inappropriate influence. Now state lawmakers in Florida will do the same, raising concerns about potentially duplicative oversight.

By Elizabeth Redden // January 13, 2020 1 COMMENT

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NEWS · 03 FEBRUARY 2020

## Harvard chemistry chief's arrest over China links shocks researchers

Nanoscientist Charles Lieber allegedly lied about his involvement in China's Thousand Talents Plan.

### The Chinese threat to U.S. research institutions is real

The Washington Post · Dec 19 · Opinion

The New York Times

## Harvard and Yale Ensnared in Education Dept. Crackdown on Foreign Funding

### We Need to Defend America's Research and Science from Foreign Spying

TIME · 5 hours ago



Courts & Law

### Justice Dept. charges professor with hiding ties to China

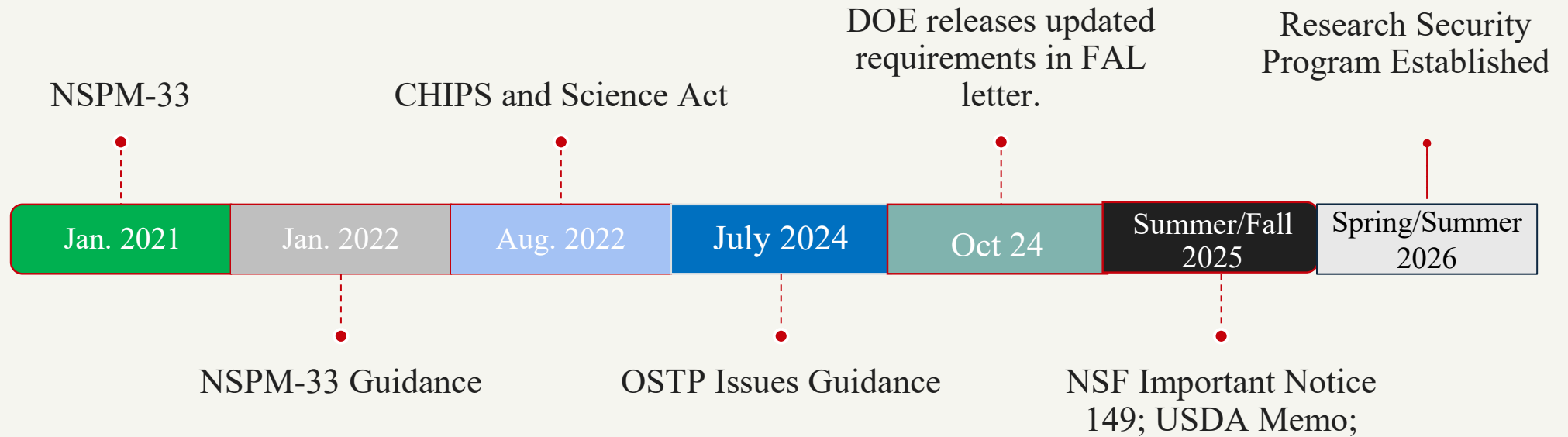
By Eric Tucker | AP

Feb. 27, 2020 at 4:53 p.m. CST

WASHINGTON — A professor at the University of Tennessee has been arrested on charges that he hid

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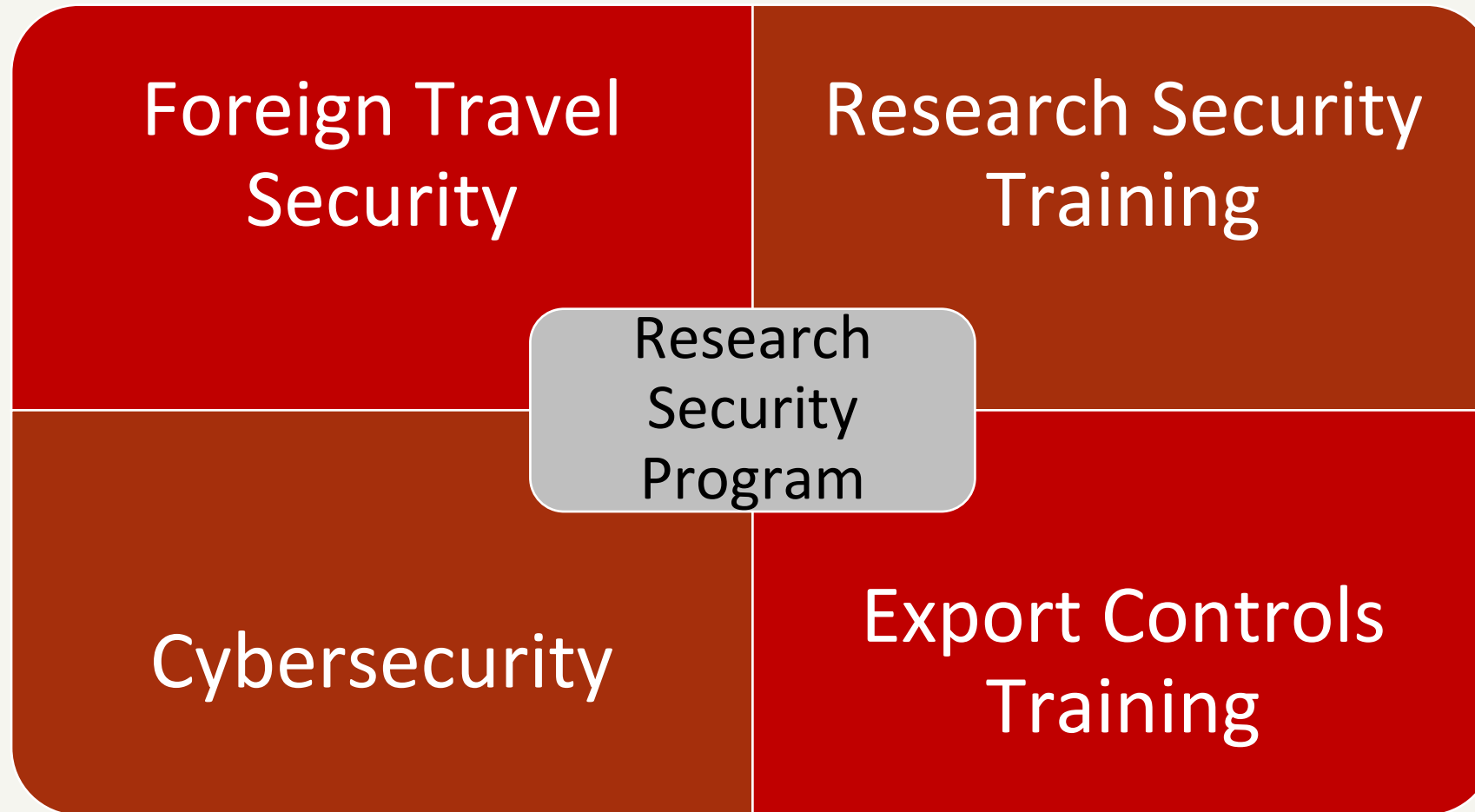
# Research Security Implementation Timeline



# Research Security Framework

- [National Security Presidential Memorandum-33](#): Requirement for research security programs.
  - Applies to covered institutions - U.S. institutions receiving \$50 million per year in federal funding.
- The [CHIPS & Science Act \(2022\)](#): 1. Requirement to follow NIST cybersecurity guidance and 2. Certification of non participation in a MFTRP.
- Agency Requirements: Varied per agency

# Research Security Program



## NSPM-33 Pillar - Cybersecurity

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- Helps safeguard federally funded research from foreign interference and misappropriation.
  - Sample controls are:
    - User authentication for controlled access to non-public materials
    - Use of UW-approved platforms and tools (e.g., e-mail, Research Drive, Box [also Box for HIPPA], etc.)
    - Endpoint protection (AMP)

# **NSPM-33 Pillar - Foreign Travel**

- Foreign travel security training
- Organizational record of travel

# NSMP-33 Pillar - Research Security Training

## Know Research Security Training Requirements

- Completed within 12 months prior to proposal submission.
- Certified by Authorized Organizational Representative (AOR) at submission. Some agencies require verification of completion.
- UW training 1.0 is offered in [Canvas](#) and takes approximately one-hour to complete.
- UW developed training 2.0 will be offered in 2026.

# Agency Expectations

Agency Requirements are focused on Disclosure and Training

- Department of Defense (DoD) released Countering Unwanted Foreign Influence in DoD funded Research at Institutions of Higher Education on June 30, 2023
- Department of Energy released requirements in October 2024 (FAL 2025-02)
- NSF issued Important Notice 149 in July 2025
- USDA Secretary's Memo (SM 1078-014) in July 2025
- NIH issued guidance that was rescinded; working to harmonize requirements

# Foreign Talent Recruitment Programs (including Malign)

Recognize and remind to disclose Foreign Talent Recruitment (FTRP) and Malign Foreign Talent Recruitment Programs (MFTRP)

- All talent recruitment programs, including malign, must be disclosed
- MFTRPs are prohibited
- UW-Madison policy on the [Prohibition on Participation in Malign Foreign Talent Recruitment Programs](#)

# What Makes a Program Malign?

Designed to recruit individuals with access to **sensitive research, intellectual property, proprietary data**, or otherwise **non-public information**. Can include:

- Unauthorized transfer of materials or information;
- Establishing a laboratory or entity in a foreign country;
- Accepting a faculty position, or other employment;
- Work that overlaps or duplicates a federal research award;
- And more...

## Example Recruitment

I represent *XXX* agency that connects global scholars with leading research initiatives.

We are currently identifying leading experts in advanced technologies worldwide to apply for the **XXX**. Having closely followed your remarkable contributions in the Department of **XXX** at **University of Wisconsin - Madison**, we greatly admire your scholarly influence and are reaching out to you as a strong candidate for this program.

# Example Recruitment

## **Our offer includes the following benefits:**

- Competitive salary and benefits package
- Extensive funding support for research projects
- Three-year appointments, with flexible or remote collaboration options

## **Eligibility requirements:**

- Candidates must be under 75 years of age
- A PhD degree completed before August 2023
- Applicants currently holding permanent employment in China are not eligible
- Note: We would be delighted to arrange a short online meeting at your convenience (XXX time or another time suitable for you)

# Quick Summary of FTRP and MFTRP

<b>FTRP</b>	<b>MFTRP</b>
Must be disclosed!	Must be disclosed!
Sponsored by one or more foreign entities	Sponsored by a country or entity identified as a Foreign Country of Concern
May be allowed if it doesn't violate university and federal policies	Prohibited by UW–Madison and federal research sponsors policies

# NSPM-33 Pillar - Export Control and Sanctions - Purposes



Department of Commerce  
Bureau of Industry and Security (BIS)  
**Export Administration Regulations (EAR)**  
Dual use items & technology



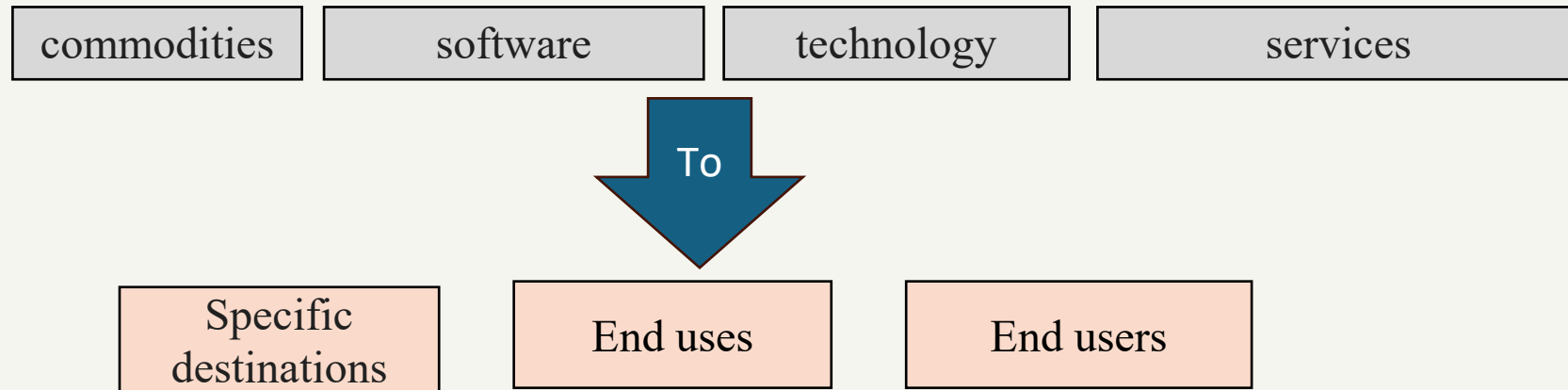
Department of State  
Directorate of Defense Trade Controls (DDTC)  
**International Traffic and Arms Regulations (ITAR)**  
Military equipment, information & technology



Department of Treasury  
**Office of Foreign Assets and Control (OFAC)** Foreign  
assets (bank accounts, property, etc.)

# Export Control and Sanctions - Purpose

The purpose of export controls is to create an enforceable regulatory net over the export, reexport, and transfer by foreign and domestic persons of specific types of:



Not all destinations, end uses, and end users are of equal concern (e.g., Canada compared to North Korea)

# Export Control Subject Areas

**International shipping/Importing:** International shipments of items, technology and software are subject to numerous import and export obligations. Before shipping anything internationally, you should determine if you can ship to that destination and if a government license or authorization is needed.

**Purchasing:** Purchasing goods/services requires the university to conduct restricted party screening to determine if UW can work with the vendor.

**Information sharing:** Sharing export controlled information to a foreign person in the U.S. may be considered an export to the home country of the foreign export (Deemed export).

# Export Control Subject Areas

**International Travel:** International travel by UW employees or students may be subject to export control regulations depending on the travel destination and the hardware, software, and/or technical data that is taken.

**International Visitors:** Foreign visitors participating in UW research, laboratory, course, training, or other activity, need to be evaluated to determine if an export compliance risk is involved.

# What Does Research Security Mean for Research Administrators

- **Disclose! Disclose! Disclose!**
- Disclosures must be up-to-date and accurate
  - OAR
  - Common Form for Biographical Sketch
  - Common Form for Current and Pending Other Support

# What Does Research Security Mean for Research Administrators

## When to disclose

- With the proposal or during JIT
- Updated disclosures may be required at time of award
- Award lifecycle through progress reports or if requested

# Scenario

- Invitation to serve as a research affiliate at Chinese University of Hong Kong.
- Aligns closely with my research.
- This is an unpaid, non-appointment role that does not involve any research support from the institution.
- The affiliate role mainly involves attending an annual research forum in summer and giving an online seminar.

# Scenario

- Does this need to be disclosed?
- How would you counsel this researcher?
- What UW resources would you recommend or reach out to?

# Thank you!

For Questions about Research Security and Foreign Government Talent Recruitment Programs please contact

- [Stefani Buster](#), Director of Research Security and Export Control
- [John Jay Miller](#), Export Control Manager
- [RSEC email](#)
- [Research Security Program website](#)