The Ohio State University is committed to promoting the highest standards of ethical research and scholarly pursuits, and we are privileged and compelled to model exemplary standards of research integrity. This work is a foundational element of Ohio State’s research mission and its strategic plan.

To help ensure that we are continuing the necessary critical evaluation of Ohio State assets, policies and procedures, the university has launched the Research Security Governance Board. Through a series of work groups, the board is assessing our current research security posture and developing improvement plans to the physical and information security controls involving research as well as dealing with security concerns related to foreign affiliations, business agreements, and global engagements. This board has also developed an approval process for vetting any international opportunities that are determined to pose more than a minimal risk to the university.

In addition to the efforts of the Research Security Governance Board, Ohio State provides a host of resources and tools to research active faculty, staff and students.

Organizational Controls

Office of Secure Research:
To more efficiently address research security issues for faculty pursuing these opportunities, Ohio State has established the Office of Secure Research (OSR). OSR will actively work with the research community to comply with export control regulations and national security related regulations and obligations. This work includes compliance with evolving requirements related to foreign influence and affiliations by federal research sponsors as well as compliance with federal export control agencies including but not limited to the International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR) and Foreign Assets Control Regulations (FACR).

Disclosure of Outside Activities:
Ohio State requires all university research personnel who are appointed to a sponsored project or are participating in human, animal or biosafety research protocols to complete an annual disclosure of all outside activities related to their institutional responsibilities. To better address federal concerns regarding foreign talent recruitment programs, the disclosure process was revised in 2019 to require disclosure of any external relationships that are related to a “foreign talent program.” This process is currently being enhanced to facilitate the reporting of affiliations, financial interests, and research support involving foreign entities.

Early Disclosure Checklist:
Prior to seeking external research funding, Ohio State researchers need to provide specific details about their proposed project by completing an online form known internally as ePA-005. These details include information that can help assess whether the project may involve potential export control issues, conflict of interest issues, infectious or select agents, security classification requirements and other potential compliance concerns. This form allows the appropriate university personnel to proactively identify and manage potential compliance risks early in the research process.

Foreign Person Visitor Protocol:
Visits from representatives of foreign governments are managed by the Office of International Affairs and the Office of Government Affairs to ensure appropriate security and controls are in place and that visitors are not provided access to sensitive areas of campus.
Visiting Scholar Agreements:
As all university research personnel, foreign visiting scholars sponsored by Ohio State are subject to university policies and procedures regarding export control compliance, institutional data, and responsible use of computing and network resources, among others. Those scholars on H1-B visas are reviewed by the Office of International Affairs and any concerns identified are shared with appropriate personnel. In some cases, prior to facilitating a visa for a visiting scholar, additional security or control measures may be implemented.

International Risk Assessment Tool:
Ohio State has launched an online survey tool to help assist the research community to consistently and transparently identify international activities that may present an elevated risk to the university. The tool considers the unique factors of each engagement such as the specific activity, the level of Ohio State engagement, the location of the activity, and entities and personnel involved. This tool facilitates the conduct of international activities by allowing low risk activities to proceed without delay or extensive compliance checks, while flagging those potentially problematic activities for additional institutional review and approval.

External Engagement

Engagement with Federal Law and Intelligence Agencies:
Ohio State has a well-established and robust working relationship with federal law and intelligence agencies and regularly collaborates on identifying and mitigating potential risks and threats. Routine meetings with key stakeholders, including senior university leadership, ensure that appropriate information is shared quickly and with the appropriate parties.

Engagement with National Associations:
Ohio State is actively involved in the Association of University Export Control Officers and many other national academic associations. The university uses these relationships to actively participate in the national conversation on research security concerns, including engaging in discussions on changes to export control regulations, the sharing of best practices, and the review of proposed legislation and rule changes.

Education and Training

Customized Export Control Training:
Ohio State has partnered with the commercial training company Export Compliance Training Institute (ECTI) and other universities to develop a comprehensive university-specific export controls training program. Started in 2017, this program has been hosted at Ohio State each fall and has provided training to hundreds of university personnel from across the country. As part of the training, ECTI offers professional certification in export controls.

Responsible Research Training:
Ohio State requires all individuals who conduct research to take an online responsible conduct of research training. This training covers conflicts of interest, peer reviews, collaborations, data collection, authorship and other key elements in the ethical and responsible conduct of research. In addition to the online training, Ohio State has hosted a number of seminars on the ethical conduct of research and continues to develop educational and training materials and resources for our research community as we receive additional feedback from faculty and learn from other universities. To reinforce the ethical values on which Ohio State research is based, research integrity training will be expanded to include what constitutes appropriate disclosures of potential or actual conflicts of interest and conflicts of commitment.