Maintaining Research Integrity and Security from Emerging Threats

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 launched the Research Security Governance Board (RSGB). Through a series of work groups, the RSGB is continually 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 address research security issues for faculty pursuing these opportunities, Ohio State established the Office of Secure Research to work with the research community to provide oversight of the university’s compliance with export control and national security regulations and obligations. This work includes compliance with evolving requirements related to foreign influence and affiliations by federal research sponsors, compliance with federal export control regulations including but not limited to the International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR) and economic and trade sanctions administered by the Office of Foreign Assets Control (OFAC).
The research security staff are an integrated, mission-focused team of security professionals experienced in various physical, administrative, and technical security elements of program security. Proven, in-place processes and facilities have been developed for performing export controlled, controlled unclassified and classified sponsored research based on risk management principles and the assets entrusted to Ohio State.

**Office of Research International Engagement Team**

In 2020, the Office of Research established the capability to perform investigations into foreign influence on research. This program was expanded in 2022 to include more proactive efforts to foster global collaboration while promoting compliance and integrity among the Ohio State research community. The team monitors evolving regulations that impact international engagements, presents information and training on how to comply with Ohio State and federal regulations and policies related to international engagements, answers questions related to international engagements and university or federal disclosure requirements and conducts internal compliance reviews which may include a wide scope of research security and compliance topics.

**Disclosure of Outside Activities**

Ohio State requires employees engaged in research at the university, employees identified by their unit as having significant financial or fiduciary responsibilities, college and regional campus deans, and President’s Cabinet members to complete an electronic conflict of interest disclosure irrespective of their engagement in outside activities. Since 2014 the electronic conflict of interest disclosure system has been continuously updated and is now a single consolidated disclosure form. Additional updates were added in 2023 to address requirements from the National Science Foundation regarding foreign investments in faculty start-up companies. To promote transparency, accountability, and efficiency, in 2022 the university implemented a comprehensive Outside Activities and Conflicts Policy to replace four existing policies that communicates consistent expectations and clearly states consequences for noncompliance, establishes a single review process for managing and monitoring conflicts, and identifies the administration and management of various types of conflicts, including external relationships related to Foreign Talent Recruitment Programs, conflicts of commitment, Ohio Ethics Law conflicts, and other federal and state laws governing financial and fiduciary conflicts of interest.

**Early Disclosure Checklist**

Prior to seeking external research funding, Ohio State researchers must 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, human subjects issues, infectious or select agents, controlled substances, 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 Government Visit Protocol**

Visits from representatives of foreign governments are overseen by the Office of International Affairs, the Office of Government Affairs and the Office of Secure Research to ensure appropriate diplomatic protocols are followed, security and controls are in place and that foreign government officials are not provided access to sensitive areas of campus. New protocol and operating procedures were developed in 2023.
International Visitor to Campus Protocol
Visits from representatives of foreign countries are managed by the Office of International Affairs, the Office of Government Affairs and the Office of Secure Research to ensure appropriate security and controls are in place and that international visitors are not provided access to sensitive areas of campus.

Visiting Scholar Agreements
As are 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.

Department of Defense Cybersecurity Maturity Model Certification
To safeguard sensitive national security information, the Department of Defense (DoD) launched the Cybersecurity Maturity Model Certification (CMMC), a comprehensive framework to protect the defense industrial base's sensitive unclassified information from frequent and increasingly complex cyberattacks. The Office of Secure Research coordinates development of system security plans for impacted systems with the appropriate university’s information technology team and manages system registration with the DoD Supplier Risk Management System.

U.S. Restricted Entity and Denied Party Screening
Ohio State has a university-wide license for the Descartes Visual Compliance Restricted Party Screening (Visual Compliance) software. Ohio State can easily screen persons and entities against Restricted Entity and Denied Party lists managed by federal agencies. Visual Compliance offers a robust, up-to-date database that includes lists from government authorities on six continents, as well as global lists maintained by multinational bodies such as the United Nations and the World Bank. The database of watch lists, sanctions, and embargoes is updated whenever the government publishes changes, helping to ensure Ohio State is working with the most up-to-date information available. Visual Compliance also automatically re-screens records against daily changes made to denied parties list and alerts Ohio State if a change was detected. The service is used to screen individuals and organizations to ensure compliance with federal export control regulations and perform risk assessments for national/international areas of concern. In 2019, Ohio State’s Vendor Maintenance group incorporated the use of Visual Compliance as part of the vendor review process. This step is now taken for all new, reactivation and vendor maintenance update requests. Ohio State coordinates a statewide license for Visual Compliance for the Ohio Department of Higher Education Research Officers Council.
Section 117 of the Higher Education Act
Ohio State oversees a disclosure report every six months to comply with the U.S. Department of Education Foreign Gift reporting to comply with Section 117 of the Higher Education Act (20 U.S.C. § 1011f). Institutions that receive a gift from or enter into a contract with a foreign source (including through intermediaries such as a foundation), the value of which is $250,000 or more, considered alone or in combination with all other gifts from or contracts with that foreign source within a calendar year, must file a disclosure report.

U.S. Department of Energy Requirements
The Department of Energy requires prior approval of foreign nationals working on funding agency projects. This prior approval applies to key personnel, staff and students, as well as any sub-recipients or contractors. The required information must be reported to the Department of Energy by the timeline indicated on the amendment or award, and the Office of Research has developed an on-line application to facilitate the secure collection, review and submission of this information. Additionally, universities must disclose whether a researcher that is currently involved in a Department of Energy award has participated in either a funded or unfunded Foreign Government Talent Recruitment Program.

NASA Requirements
NASA is prohibited from providing funding to individuals who participate, collaborate, or coordinate bilaterally with China or any Chinese-owned company. On proposals, the Principal Investigator must report any involvement with collaborators in China or with Chinese organizations and the university must certify compliance with that restriction for each proposal or award.

Research Security Program
Ohio State is committed to implementing a Research Security Program as recommended by National Security Presidential Memorandum 33 and detailed by the Office of Science and Technology Policy. Ohio State will meet requirements in four primary areas: Foreign Travel Security, Research Security Training, Cybersecurity and Export Control Training. The program will be expanded as additional clarification guidance is provided by the federal government.

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

Annual Export Control Training Seminar
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.

Training for Faculty and Staff Engaged in Export Controlled Research
The Export Control Program provides customized, project-based training to all university personnel who engage in Export Control research. Research teams are trained at project kickoff and when new individuals are added to the project. Training topics include an overview of federal regulating bodies, a comparison of the Export Administration Regulations (EAR) and International Traffic in Arms Regulations (ITAR), and the risks presented by engaging with restricted parties. Training is tailored to address the specific physical, information technology and personnel security protocols required for each individual project. Project participants are provided with both the knowledge and resources to ensure compliance with federal export controls throughout the research lifecycle.

Conflict of Interest, Export Control and Compliance with International Engagements Overview
In 2021, the Office of Research Compliance and the Office of Secure Research created an overview of Conflict of Interest, Export Control and compliance with International Engagements to increase awareness of security and compliance requirements. This overview is presented live at the department level to engage faculty and staff in the discussion, allow for questions unique to each department and increase awareness of the staff and resources available to faculty and staff. Presentations are scheduled every semester and the program has engaged close to a thousand faculty and staff already.

Responsible Conduct of Research Training
Ohio State requires all individuals who conduct research to take an online responsible conduct of research training. This training covers research misconduct, protection of human subjects, welfare of laboratory animals, conflicts of interest, 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, appropriate data management and recordkeeping practices, maintaining confidentiality and security of the peer review system, and safe research environments free of any form of discriminatory harassment.