



June 30, 2023

VIA Email: [RSI-ISAO@nsf.gov](mailto:RSI-ISAO@nsf.gov)

Dr. Rebecca Spyke Keiser  
Chief of Research Security and Policy  
2415 Eisenhower Ave  
Alexandria, VA 22314

ATT: Dear Colleague Letter: A Request for Input on the Development of the U.S. Research Security and Integrity Information Sharing Analysis Organization (NSF 23-098)

Dear Dr. Keiser:

On behalf of the Association of Public and Land-grant Universities (APLU), I thank you for the opportunity to provide input on the development of the U.S. Research Security and Integrity Information Sharing Analysis Organization (RSI-ISAO).

APLU is a research, policy, and advocacy organization dedicated to strengthening and advancing the work of public universities. With a membership of more than 250 public research universities, land-grant institutions, state university systems, and affiliated organizations, APLU's agenda is built on the three pillars of increasing degree completion and academic success, advancing scientific research, and expanding engagement. Annually, our U.S. member campuses enroll 4.2 million undergraduates and 1.2 million graduate students, award 1.2 million degrees, employ 1.1 million faculty and staff, and conduct \$48.7 billion in university-based research.

Public research universities have partnered with the National Science Foundation since its inception to promote scientific research and benefit local communities. This breadth of work is a critical resource for the nation and must be protected using methods appropriate to each field's resources and risks. As universities continue to enhance research security and consider what research security needs are most appropriate for their researchers, the NSF RSI-ISAO stands to provide a significant resource by prioritizing next steps, standardizing practices, and providing connections to trusted experts.

APLU appreciates the work of the National Science Foundation and its role in funding, and protecting, the widest portfolio of basic research among the agencies. APLU appreciated the opportunity to participate in our May 19, 2023 roundtable discussion with NSF staff and our constituency groups, including senior research officers (SROs), diversity officers, provosts, international officers, HBCU members, institutional data officials and governmental affairs officers to identify common needs for the RSI-ISAO.

APLU provides comments on the seven requested fields of input:

1. Current Research Security and Integrity Issues:

Public research universities recognize the need to appropriately protect U.S. investments in the research and development enterprise. The community appreciates the framework laid out in National Security Presidential Memorandum – 33 (NSPM 33) and continues to monitor its implementation.

APLU members have repeatedly expressed the need for clear, easy-to-understand tools and more specific threat analysis to help them make risk-based decisions about international academic, cultural, and research partnerships. APLU members need more robust and country-specific resources to help answer students and researchers' questions about fundamental research partnerships with foreign individuals, institutions, and governments.

The cost of compliance remains a major concern for many institutions. The RSI-ISAO should help to bring down compliance costs for institutions by establishing best practices and shared resources. This could include shared templates for information collection and training, regular dissemination of updated threat analysis and mitigation strategies, and providing a gateway for individual scientists to learn more about the potential threats and proactive steps they can take to promote responsible international research partnerships.

2. Informational Resources:

To assist lower-resourced institutions implement security requirements, our members recommended that the RSI-ISAO supply a prioritized list that identifies the most important practices to consider as institutions expand and secure their research investments. Examples must be applicable to all researchers and not single out those from specific backgrounds or heritages. Case studies should not only include instances of actions to avoid, but examples of mutually beneficial partnerships. Research security process prioritization could help alleviate the cost burden of implementation for smaller institutions, as they efficiently deploy security policies of most relevance to their needs and could be stepped up over multiple fiscal years.

Our nation's competitiveness not only relies on our local talent, but on our respectful and productive collaborations with allied nations. The RSI-ISAO should provide one-pagers to describe how to safeguard new and existing *beneficial* international partnerships.

As a central clearinghouse of information with an affiliation to the NSF, the RSI-ISAO should communicate research security training materials. The RSI-ISAO should also be responsible for regularly updating training materials to alleviate any burden or confusion as training information inevitably requires frequent changes.

3. Prioritization of the RSI-ISAO's Duties

Prioritization of the duties as described in the CHIPS and Science Act of 2022 is challenging. During our round table with NSF, institutions highly prioritize the creation of standard practices and the development of informational resources to be shared with their research faculty, specifically for threat assessment and foreign travel training. Others are ranked as follows, noting many are interrelated:

- 1) Develop a standard set of frameworks and best practices, relevant to the research community, to assess research security risks in different contexts.
- 2) Provide timely reports on research security risks to provide situational awareness tailored to the research and STEM education community.
- 3) Support analysis of patterns of risk and identification of bad actors and enhance the ability of members to prevent and respond to research security risks.
- 4) Provide training and support, including through webinars, for relevant faculty and staff employed by institutions of higher education on topics relevant to research security risks and response.
- 5) Enable standardized information gathering and data compilation, storage, and analysis for compiled incident reports.
- 6) Share information concerning security threats and lessons learned from protection and response efforts through forums and other forms of communication.
- 7) Serve as a clearinghouse for information to help enable the members and other entities in the research community to understand the context of their research and identify improper or illegal efforts by foreign entities to obtain research results, know-how, materials, and intellectual property.

#### 4. Integration:

Institutions will utilize RSI-ISAO's resources and tools if they can be relied upon to appropriately inform their international strategy and partnership decisions and to provide resources for mitigation strategies that will promote responsible international partnerships. Best practices that are recognized across the higher education community and the federal agencies will help to decrease confusion and more fully engage institutions and researchers in due diligence, risk assessment, and management.

#### 5. Benefits Based on Position:

SROs often serve as a locus between sponsored research support, pre- and post-award support, compliance, cybersecurity, and technology transfer. SROs see the RSI-ISAO's resources as a potential time saver if routinely updated to provide risk-based assessments and mitigations strategies that can be put to work were provided. The SROs also communicate across the research faculty and can utilize the RSI-ISAO's resources in their local training and outreach.

#### 6. Liaison Role:

It is important for the RSI-ISAO to provide open-source resources that can be shared widely across universities. Because universities will choose to participate with the RSI-ISAO on a


voluntary basis, it is also important for the RSI-ISAO to have no enforcement or required reporting role. It could provide connections to other universities facing similar challenges or appropriate federal agency experts, but this should be on a voluntary basis.

7. Other information:

Understanding that the statutory language in the CHIPS and Science Act does call for NSF to provide initial funds for the creation of the RSI-ISAO and then seek participation fees, APLU urges NSF to support the lowest possible participation fees. Research security regulation compliance is a growing expenditure for institutions. Large fees to access shared resources will likely discourage membership from lowered-resourced institutions and could cause significant membership fluctuations year to year based on institutional financial situations.

We thank the NSF for the opportunity to comment and want to work with you to ensure the proper protection of federally funded research and development investments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Becker", with a long horizontal flourish extending to the right.

Mark Becker  
President, Association of Public & Land-Grant Universities