

## **NSF Research Security Training Module 3: Manage and Mitigate Risk QRG**

**Objective:** by the end of this training, you should be able to identify, manage, and mitigate potential risks associated with international activities.

International collaboration is an important part of what drives US research and development. Our goal is to help you be aware of and understand how to manage the potential risks of international collaborations in order to safeguard research.

### **What are the risks?**

One major risk of international collaboration is theft of data. You should assume that any of your devices may be accessed by others without your permission while traveling, make sure you take security precautions appropriate for your destination and type of data. You must protect your data, intellectual property, and other sensitive information.

Other potential risks include sharing restricted information or materials, violating export and sanction regulations, and threats to personal safety or reputation.

### **Mitigating risk**

To mitigate these risks, you must follow all laws, institutional requirements, and award terms and conditions when collaborating with other countries.

Ensure you are following both country's laws regarding the following:

- Shipping – there may be packaging, labeling, or weight requirements as well as import regulations if sending to a country outside of the United States.
- Export control laws and regulations – be aware of any limitations on the export of software or data on your device and check to see if any export licenses are required.
- Bad actors – screen collaborators to ensure they're not on any US restricted lists.
- Malign foreign talent recruitment – opportunity cannot be a malign program.
- Visa requirements and expiration.
- Reporting of all foreign income to the IRS.

Your institution (UMB) has the following requirements:

- Comply with UMB travel policies.
- Sign a data use or material transfer agreements before sharing any data.
- Take the minimum data necessary.
- Only share data consistent with the data management plan.
- Establish clear expectations between collaborating institutions with an agreement.
- Protect all data and intellectual property and educate others on proper security.

- Visitors should only have access to information related to and needed for the collaboration. Do not allow visitors to access restricted information or equipment.
- Ensure any visitors receive safety, data security, or other training upon arrival.
- Consult with institution regarding potential insider threats.
- Ensure you are not violating employment policies, such as conflicts of commitment.
- Comply with regulatory requirements.

The terms and conditions of your award may include the following:

- Applicable travel preapprovals or restrictions
- Limitations on secondary or overseas appointment
- Approval requirements for hosting visitors
- Restrictions on information sharing
- Disclosure of international collaboration and outside funding as other support
- Other agency disclosure requirements

You also need to consider your personal risks such as:

- Personal physical safety – consult US State Department travel advisories.
- Time management – don't commit to more than you have time to complete.
- Reputational risks – maintain trust and reputation by disclosing engagements.

### **Avoiding conflict**

You should also know what could cause conflict when collaborating internationally so you can prepare ahead of time to avoid it.

Where conflict could arise and how to avoid it:

- Authorship attribution – researchers in the same field but in different countries can have different norms and traditions, especially around attribution of authorship on publications. Establish how this will work in your specific collaboration.
- Conflicting national research integrity rules – you and your partners may be operating under different or even conflicting research integrity rules and expectations. Any differences need to be identified early in strategies developed to comply with them so that no participants run the risk of violating their national rules and requirements for research integrity.

It is extremely important that you are mitigating risk appropriately. Your institution can help ensure that you are following all laws, rules, and regulations set by the United States, the other country involved, the collaborating institutions, and your sponsor.