

Research Security and Export Controls: Practical Guidance for Navigating Today's Research Landscape

IRB Brown Bag
September 16, 2026

The ECIC team

We are here to help navigate the fluid export controls and research security regulatory landscape.



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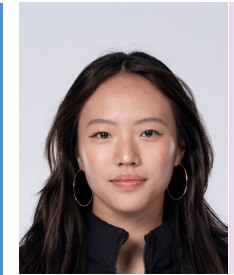
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Student
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International considerations



TRAVEL

Travel outside the U.S. can trigger the need for a license depending on multiple factors.

[Travel Guidance](#)



SHIPPING

Export Control should be notified before the export of items outside the U.S.

[Shipping Guidance](#)



OFAC & MILITARY END-USE COUNTRIES

Highly sanctioned and embargoed, and military end-use countries pose some of the most significant risks.

[Country Guidance](#)



COLLABORATORS, AGREEMENTS, AND VISITORS

Working with some global partners (individuals, universities, organizations) is restricted. Conduct Restricted Party Screenings in advance. [RPS Guidance](#)



MALIGN FOREIGN TALENT RECRUITMENT PROGRAMS

Individuals applying for or receiving federal funding cannot be MFTRP members.

[Research Security Guidance](#)

EXPORT CONTROLS & SANCTIONS

Export controls and sanctions are U.S. laws and regulations that restrict or prohibit trade, financial transactions, and the transfer of goods, technical data, services, or assets to specific foreign countries, entities, individuals, or activities for foreign policy and national security reasons.



Restrict access to technology for U.S. national security



Further U.S. foreign policy interests



Prevent terrorism, weapons proliferation, narcotics trafficking, etc.

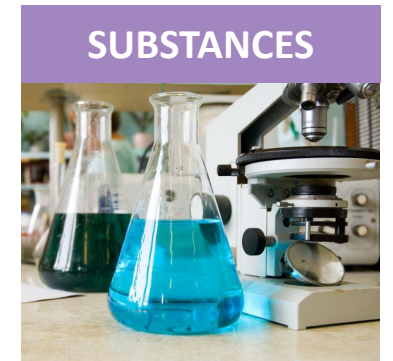
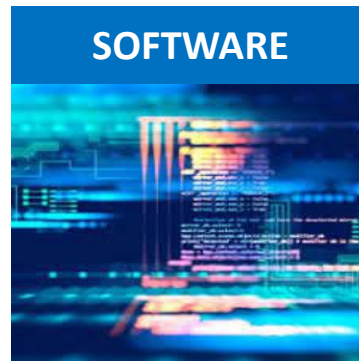
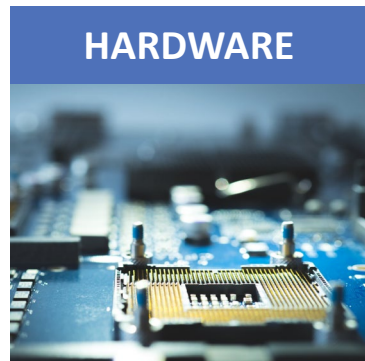


Satisfy multilateral obligations

How can an export occur?

Under the Federal Export Administration Regulations (EAR), an export can occur:

1. By the **physical movement** of a controlled item outside the United States, or
2. By the **transfer** or **release** of controlled technology or source code, whether outside or inside the United States, to a foreign national. This second transfer is defined as a **deemed export**.



About fundamental research

What is Fundamental Research?

Basic and applied research in science and engineering conducted at accredited U.S. institutions of higher education where the resulting information is ordinarily published and shared broadly within the scientific community.

What is the Fundamental Research Exclusion (FRE)?

A key concept that exempts certain research information from licensing requirements.

*The FRE does not apply to physical exports or encryption software.

For example: International shipments or travel abroad with research materials or equipment.

Do I need a license to share my research data with foreign persons in my lab?

Not if you are doing Fundamental Research.

What cancels the Fundamental Research Exclusion?

- Publication Approvals
- Foreign Person Restrictions

How do I know if something is export controlled?



PEOPLE

Restrictions impacting people, organizations, universities you collaborate with.

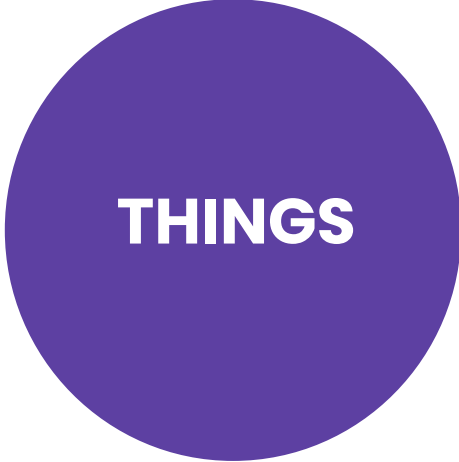
Restricted Parties



PLACES

Countries involved in traveling, shipping, or collaborations.

Risk Countries



THINGS

Regulated materials, equipment, software, data, and research.

Items, End uses

High risk countries

Military End Use Countries, plus*

- Belarus
- Burma
- Cambodia
- China (Hong Kong + Macau)
- Iraq*
- Nicaragua
- Russia
- Syria*
- Venezuela

OFAC (comprehensively sanctioned, plus**)

- Cuba
- Iran
- North Korea
- Ukraine (certain areas)
- Belarus**
- Russia**

Check our website for updates at:

<https://exports.northwestern.edu/federal-regulations/>

OFAC countries and sanctions

Activities that very likely need a license:

- **Almost anything!**
- Presentations (even virtual)
- Conferences (even virtual)
- Working remotely
- Research
- Surveys or data collection
- Payments
- Remote or online classwork
- Software use (in many cases)



Cuba
North Korea
Iran (extreme sanctions)
Ukraine (certain areas)

Belarus
Russia

Major operational impacts on Iran-related academic activities

Most interactions involving individuals located in Iran, or individuals outside the U.S. who are ordinarily resident in Iran, are now prohibited unless a Specific License is obtained from OFAC in advance.

This includes:

- Academic and educational services (including admissions and enrollment)
- Recruitment, hiring, and employment activities
- Enrollment and participation in online courses
- Research and academic exchanges
- Conferences and professional meetings
- Athletic programs and competitions
- Other university-sponsored engagements involving individuals in Iran

Limited exception: Individuals already in the U.S

Students, faculty or staff, who are ordinarily residents of Iran, but already in the US with a valid immigrant or nonimmigrant status in one of the categories specifically enumerated in the general license under 31 CFR 560.505 are not affected by this change and may continue to participate in the activities for which their visa was issued or other status granted, including receiving tuition support, salary, or other authorized payments, provided those transactions do not involve restricted parties or prohibited financial channels (31 CFR 560 505).

Unfortunately, there is no applicable general license for students, faculty, or staff ordinarily resident in Iran, when they are located outside the United States.

ACTIVITY	WHAT ARE YOU DOING?	RESOURCES
Travel Abroad	Are you traveling to a high-risk country (OFAC or MEU)?	OFAC and MEU countries
International Shipping	Is your shipment or hand-carry item high-risk? ▪ Biological, chemical, or hazardous materials (example: virus, toxin, bacteria, GMO) ▪ Critical or emerging technology area (e.g., IC, supercomputer, quantum, biotech) ▪ High-tech or encryption equipment (example: camera, scanner, software) ▪ Military / Space item ▪ Any shipment to a high-risk country (OFAC and MEU)	Shipping guidance with Eship Global
International Collaborations	Are you collaborating with anyone from OFAC-designated countries or MEU countries, particularly those residing outside the United States? ▪ What is the nature of the collaboration? ▪ Are they affiliated with a restricted entity? ▪ Overlap with federal funding? ▪ Are they a member of a foreign talent recruitment program? ▪ Does your award have restrictions? Did you disclose it?	Restricted Party Screenings Foreign Talent Programs Federal Risk Assessments Research Visitors Disclosures
Purchasing	Are you purchasing controlled items, such as equipment, software, technology, substances, or materials (as indicated in the end-user statement, marked as export-controlled)?	Purchasing guidance

If YES, contact the ECIC team for an export control and research security review.
exportcontrols@northwestern.edu

RESEARCH SECURITY

Research Security

There is increased federal scrutiny around collaborations with high-risk countries.

There have been many federal updates and numerous additional universities, particularly from China including Hong Kong and Macau, Russia and Iran being added to restricted lists.

Restricted Party Screenings

Restricted party screenings

Who should be screened?

- Potential Collaborators
- Potential Co-authors
- Foreign Contracting Parties (if not done through SR)
- If postdoc or graduate student goes to work at an institution in a high-risk country after leaving NU
- Any purchase on a PCard from a high-risk country
- Anyone else upon request

[Link here for FAQs](#)

Northwestern automatically screens:

- [Research visitors](#)
- Recipients of international shipments via eShip Global
- Sponsored research agreement partners
- Vendors processed by Procurement & Payment Services

How can you request a restricted party screening?

ECIC performs most of the screenings.

[See full lists here.](#)

Federal Regulations

Executive summary: New federal regulations

- **DoD Risk Matrix (March 2026, 60 days after)**
Immediate restrictions on equipment, services and collaborations involving prohibited entities.
- **NSF Dear Colleague Letter (July 8, 2026)**
Prohibition on Collaborations with Restricted Entities.
- **BIOSECURE Act**
Gradual restrictions on biotechnology companies of concern through 2028.



Institutional risk spans compliance, funding eligibility, procurement, and shared facilities

What does this mean for research?

- Stop using equipment and services from prohibited entities in DoD funded projects.
- End prohibited collaborations (including some co-authorship scenarios).
- No new purchases, services or collaborations involving prohibited entities regardless of funding agency.
- Develop mitigation/transition plans where existing equipment is affected.



Immediate action is needed to avoid compliance issues and funding impacts for NU and our researchers

NSF prohibition on Collaborations with restricted entities

July 8, 2026

NSF announced FY2027 policy that:

(1) prohibits use of NSF funds for collaborations with entities on U.S. restricted-party lists; and

(2) prohibits Senior/Key Personnel from holding appointments, positions, or receiving research support from those entities during the NSF award.

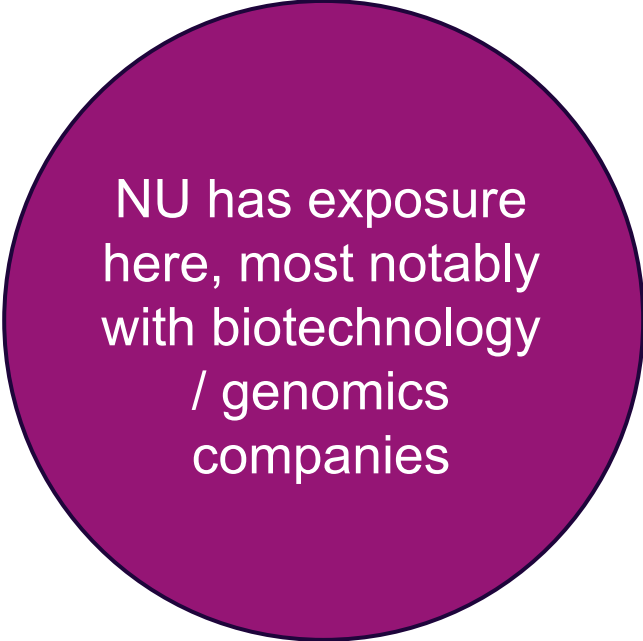
- Researchers should review external collaborations, affiliations, and research support now.
- Early identification of conflicts will reduce risks.
- Institutional processes need enhancement to prevent issues.



NSF
implemented
early before the
FY2027 rollout

BIOSECURE Act passed

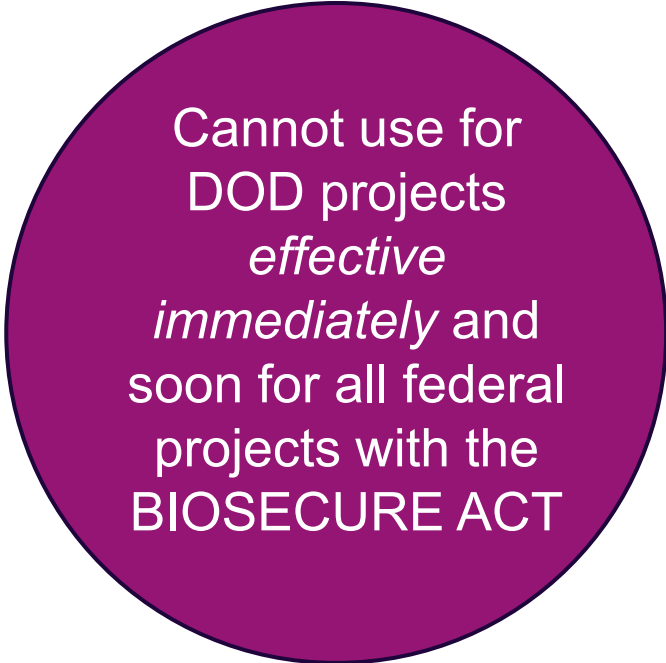
- Restricts procurement of biotechnology equipment and services from biotechnology companies of concern (BCCs).
- 1260H-listed entities are automatically treated as BCCs.
- Additional BCC designations expected by OMB, so the list of prohibited companies could grow.
- Anticipated implementation timeline extends into 2028.



NU has exposure here, most notably with biotechnology / genomics companies

NU procurement payments with:

- Complete Genomics
- Innomics Inc (Innomics)
- Novogene Corporation Inc. (Novogene)
- Stomics Americas Ltd (Stomics)
- WuXi Apptec



Cannot use for
DOD projects
effective
immediately and
soon for all federal
projects with the
BIOSECURE ACT

NIH Foreign Components

- Foreign components must be disclosed to NIH and approved before work begins.
- May include foreign collaborators, co-authorship, use of foreign facilities, or foreign-funded resources.
- Applies even when no NIH funds are sent to the foreign institution.
- Disclose foreign collaborations, affiliations, funding, and in-kind support throughout the award.



Foreign Talent Recruitment Program

Foreign Talent Recruitment Program (OSTP):

A foreign talent recruitment program is any program, position, or activity that includes compensation in the form of cash, in-kind compensation, including research funding, promised future compensation, complimentary foreign travel, things of non de minimis value, honorific titles, career advancement opportunities, or other types of remuneration or consideration directly provided by a foreign country at any level (national, provincial, or local) or their designee, or an entity based in, funded by, or affiliated with a foreign country, whether or not directly sponsored by the foreign country, to an individual, whether directly or indirectly stated in the arrangement, contract, or other documentation at issue

Is My Talent Program Malign?

1

Are you being paid or receiving any form of compensation (i.e. recognition, awards, money, funding, reimbursement, land, etc.) from a country other than the US (including the promise of future compensation of any kind?)

2

Is the program from China, Iran, Russia, or North Korea?

3

Contact the Export Controls & International Compliance team if you are asked to engage in or are participating in any of the following activities:

3

Contact the Export Controls & International Compliance team if you are asked to engage in or are participating in any of the following activities:

- Recruit others (trainees, researchers, speakers, etc.) to participate in a talent program with a foreign entity.
- Hold a position, an appointment,* a laboratory, or a company in a foreign country
- Engage in a contract/agreement where termination is not an option or is difficult
- Unauthorized transfer of (IP) intellectual property), materials, data, or other nonpublic information
- Engage in work for or in another country that overlaps with U.S. Federal dollars
- Apply for or receive funding from a sponsoring foreign entity where you did NOT engage Sponsored Research
- Omit a recipient affiliation, or being told/required to make omissions
- Conceal program participation in any way

*Simply holding a position or appointment does not constitute a “malign” talent program but if it’s with a country of concern it maybe problematic

Federal agency risk matrices

Agency	Risk Factor 1	Risk Factor 2	Risk Factor 3	Risk Factor 4	Co-authorship Considered	How Far Back?
DoD (including DARPA)	MFTRP participation is prohibited; any FTRP participation is a risk factor.	Funding from an FCOC within the past 5 years (mitigation measures required)	Patent applications or patents from US-funded research filed in FCOC or on behalf of FCOC entity before filed in the US.	Affiliation with Prohibited Entities or if PI's co-authors are affiliated with a Prohibited Entity at time of review	Yes	5 years
US Army	MFTRP participation is prohibited; any FTRP participation is a risk factor.	Affiliation with entities on the Prohibited Entities	Active conflict of commitment or funding from strategic competitors	Active affiliation, association, or collaboration with strategic competitors	Yes, including participating in a Panel	Not specified
DOE	MFTRP participation is prohibited; any FTRP participation is a risk factor.	Foreign ownership or control, criminal or regulatory issues, supply chain of sensitive equipment/supplies, ties to entities on specified lists	Affiliations, associations or collaborations with Prohibited Entities	Whether the project involves a critical and emerging technology area	Yes	Not clearly specified but 2019
NIH	MFTRP participation is prohibited; any FTRP participation is a risk factor.	Undisclosed or incompletely disclosed foreign funding, particularly from FCOC	Undisclosed active affiliations with institutions or entities from a FCOC	N/A	Not as a risk factor but NIH does require approval of foreign components	5 years
NSF	MFTRP participation is prohibited; any FTRP participation is a risk factor.	Receiving research support from an Prohibited Entity, nondisclosure of such support	Active appointments and positions with restricted entities; nondisclosure of such activities	Key/critical technologies and national security applications	No	Undisclosed information will be examined from January 2022

Risk Matrices Table 2026  in Excel for screen readers

Adapted with permission from Vanderbilt University

Disclosures

Recent headline 08.26



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Ohio State University Agrees To \$2.1M Settlement To Resolve Allegations That It Failed To Disclose Employees’ Ties To The People’s Republic of China In Applications For Federal Research Funding

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PRESS RELEASE

Ohio State University Agrees to \$2.1M Settlement to Resolve Allegations that it Failed to Disclose Employees’ Ties to the People’s Republic of China in Applications for Federal Research Funding

Disclosure requirements ([Resource Link](#))

Relationships

- Appointments
- Affiliations
- Collaborators
- Co-authors
- Leading or performing research elsewhere
- Talent program participation

Funding

- All sources of funding available to your program
- Funding for similar work from other sources – both foreign and domestic

Resources

- Other research space
- Funded visitors
- Materials / equipment – even if provided “in-kind”

Activities

- Research outside of primary institution
- Investments* (e.g., startups)
- Some travel
- Consulting / paid speaking*

**There are parameters for these categories of activities.*

Where and how to disclose

- **Biographical Sketch:** Include any academic, professional, or institutional appointments and affiliations, whether paid or unpaid, including adjunct, visiting, guest, or honorary
 - **Current & Pending/Other Support:** Include all resources available to the research program, whether at Northwestern or elsewhere, including grant support (with or without salary), access to lab space and equipment, supplies, funded visitors, and in-kind resources ([Resource Guidance](#))
 - **Facilities/Other Resources:** Project-specific resources, including in-kind materials, personnel with their own funding (e.g., visiting postdocs or externally funded students) who are available to the project
 - **Project Reports:** At least annually, update participant lists, accounting for both paid and unpaid contributors, foreign components, and other support, as applicable
-
- **eDisclosure:** Significant Financial Interests, i.e. external financial interests that relate to institutional responsibilities. Outside appointments and positions.



Researchers must update COA or Biosketch with new collaborations, publications, etc.

Risk Mitigation Plans & Research Security Certification

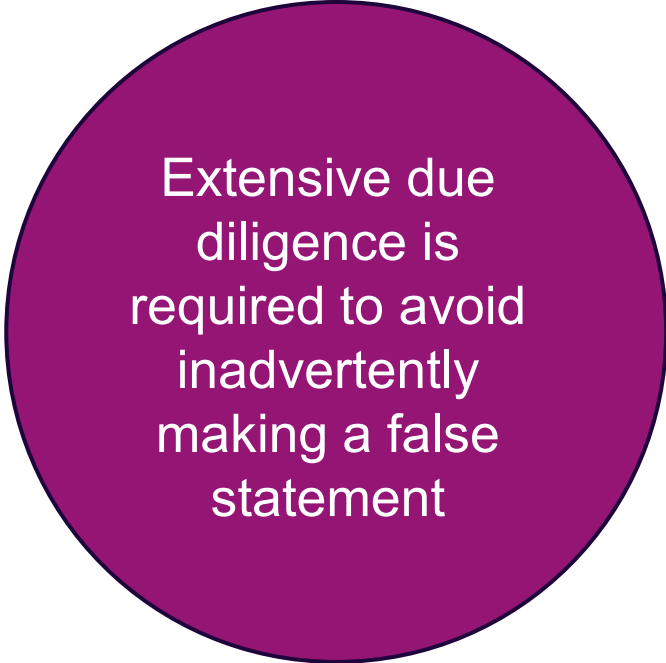
Risk mitigation plans & research security certifications

Mitigation Plans

Risk Mitigation Plans (RMPs) are developed by the ECIC team with the PI to define compliance measures to mitigate research security risks outlined by the federal government.

Research Security Certifications

Research Security Certifications (RSCs) are certifications required by the federal government (and vary by agency.) PI verifies disclosures (including co-authors), no malign foreign talent program connections or affiliations with restricted parties. The ECIC facilitates this process.



Extensive due diligence is required to avoid inadvertently making a false statement

Sample NSF certification language

I, **[NAME]**, certify that the information in the Biographical Sketch, Current and Pending (Other) Support, and Collaborators and Other Affiliations forms for all pending proposals are both complete and accurate to the best of my knowledge and that I have not intentionally omitted any fact. I further certify that I have not entered into and will not enter into any position or appointment with a U.S. proscribed entity for the duration of the award listed above as well as other active NSF awards on which I serve as PI, co-PI, or Senior Personnel. In addition, I certify that I will not accept any research support from, or engage in collaboration² with a U.S. proscribed entity for the duration of the award listed above, as well as for other active NSF awards on which I serve as PI, co-PI, or Senior Personnel.

- Specifically, I attest that I:
 - do not hold an active position or appointment with any U.S. proscribed entity;
 - am not receiving any research support from any U.S. proscribed entity; and
 - am not collaborating and will not collaborate with a U.S. proscribed entity, or employee thereof.



PI and Institutional
Certification Required;
also asked to provide
updated disclosures
within 30 days and
sometimes immediately

Sample DOD certification language

- Northwestern University certifies that, to the best of its knowledge, the information provided for **[CI NAME]** in the above-referenced project is current, accurate, and complete.
- Northwestern University further certifies that **[CI NAME]** is not actively participating in a Malign Foreign Talent Recruitment Program.
- Northwestern University also certifies that **[CI NAME]** is not actively collaborating on fundamental research with a prohibited entity, or an employee of a prohibited entity, as defined by current Department of Defense research security policy.

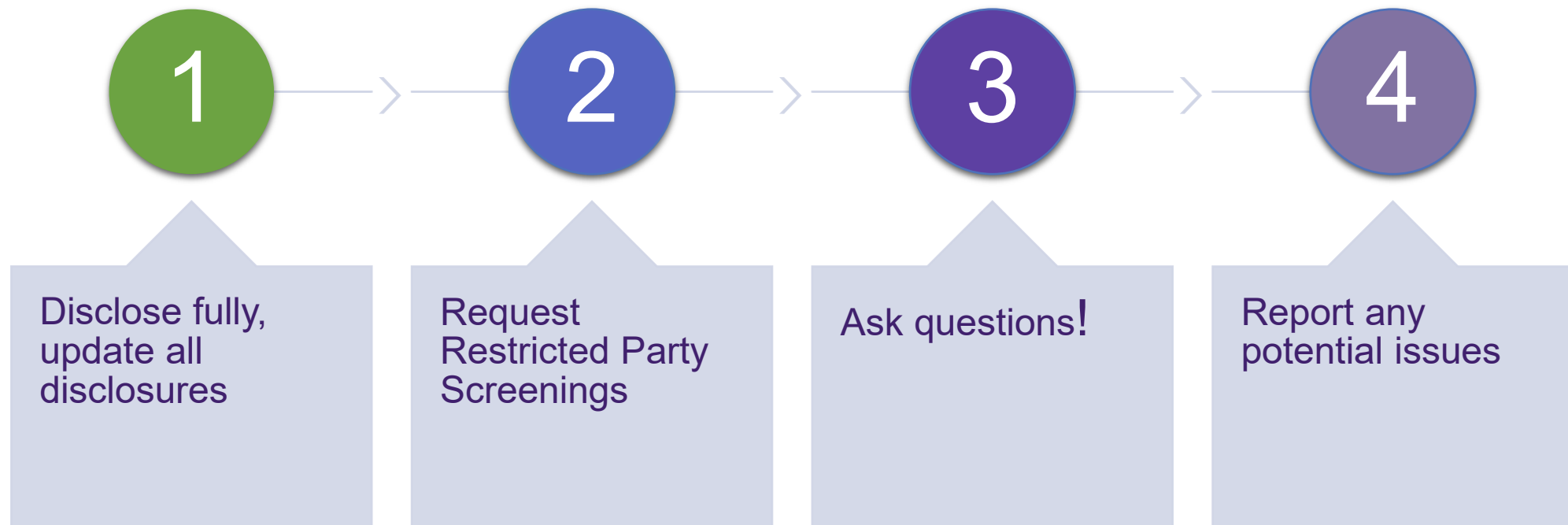


Typically an institutional certification, but consultation with the PI or covered personnel is necessary

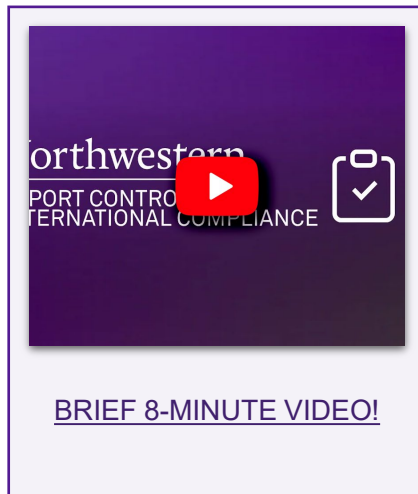
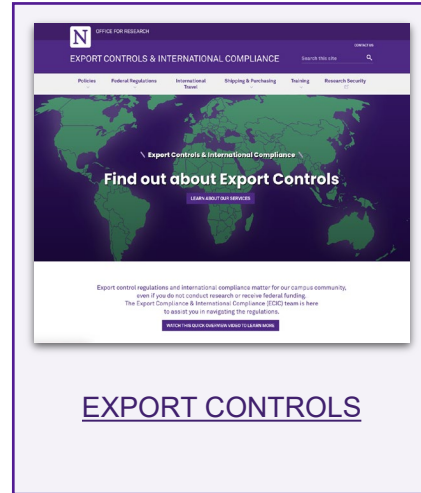
ACTIVITY	WHAT ARE YOU DOING?	RESOURCES
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If YES, contact the ECIC team for an export control and research security review.
exportcontrols@northwestern.edu

What can you do to avoid inadvertent missteps?



Resources and FAQs



- [Current & Pending Other Support](#)
- [International Collaborations](#)
- [Disclosure guidance](#)
- [Improper Foreign Influence](#)
- [Federal Agency Risk Reviews](#)
- [Foreign Talent Program Guidance](#)
- [Restricted Party Screening – Denied Entity](#)
- [International Travel Guidance](#)
- [OFAC Guidance](#)
 - Cuba, Iran, North Korea, Syria, and parts of Ukraine
- [International Shipping](#)

Contact the ECIC . . .

The best place to reach us:
exportcontrols@northwestern.edu

