



Research Security Reviews

- **“It’s About the Science” - Understanding the Science First**
 - Awareness of U.S. technical state of the art
 - Understanding potential research applications
- **Risk Determination and Mitigation**
 - Risk / Benefit assessment
 - Consensus balanced risk determination to mitigate risk
 - **Low** Tailored threat awareness training
 - **Medium** Disassociation from malign foreign subsidiaries (FOCI), remove conflict of interest or commitment, controlled access and monitoring
 - **High** Denial or reassignment of applicant or sub-applicant
- **Program Maintenance**
 - Open lines of communication
 - Routine status reports and reviews

Low Risk

No FEOC or FOICI
No malign foreign affiliation
No Mil/Civ application
No conflict of Interest or Commitment
Fundamental research

Medium Risk

No FEOC, Potential FOICI
Previous malign foreign affiliation
Potential Mil/Civ application
Conflict of Interest or Commitment
Applied research

High Risk

Existing FEOC and FOICI
CET with Mil/Civ Application
Existing malign foreign affiliation
Conflict of Interest or Commitment
Proprietary research
Failure to Disclose or Deceptive Information

Research Security Reviews

Open Sources (non-inclusive)

- ITA CSL - <https://www.trade.gov/data-visualization/csl-search>
 - USG restrictions on company, entity, or person
 - Commerce BIS / State Dept / Treasury Dept
- ASPI - <https://unitracker.aspi.org.au/>
 - Chinese institutions engaged in military or security-related science and technology research
 - Returns risk level and PRC PLA/PLAN focused technologies
- Government of Canada
 - Named Research Organizations (science.gc.ca)
- Google Scholar and Web of Science
 - Search for scholarly literature
 - Foreign connections (e.g., Grants, Awards, Papers, Conferences)
- LinkedIn
 - Professional network
- Internet Search Engine
 - Financial (e.g., business location, venture capital)
 - CV / resume information validation
- Grants.gov and SAM.gov
 - USG Grant awards
- Trade Integrity trade-integrity.org
 - Monitoring Military and Dual-Use Trade with Russia
- Pitchbook and Crunchbase
 - Financial analysis tools

Key Questions to Consider (non-inclusive)

FOCI – Foreign Ownership Control & Influence

Conflicts of Interest and Commitment

Foreign Obligations (e.g., venture capital)

Foreign Education

Malign Foreign Talent Recruitment Programs

Position sensitivity - Access
(CUI / Intellectual Property / Technology)

Export Control and Compliance

Foreign Publications / Patents

Scholarships / Awards / Professional Memberships

Foreign conferences and meetings

Technology skills matches company and people

Cybersecurity and data management

Locations of subsidiaries

Status of Research Security Program