



Fundamental Research.
Global Collaboration.
Shared Responsibility.

Navigating a changing landscape
together.

ISSUE BRIEF

Research Security &
Collaborations of Concern

The federal research security environment is changing - shifting the focus from the research itself to the researchers, their affiliations, and their relationships.

READ THE ISSUE BRIEF IN FULL ➔

OVERVIEW &
CURRENT STATUS

New disclosure requirements, restricted-party lists, heightened scrutiny, and risk-assessment processes are making international collaboration - even on open, publishable research - more complex.

Some agencies are moving from risk-based assessments to list-based prohibitions that can restrict participating based on affiliation alone, even when the research is fundamental and unrestricted.

THE EMERGING PATTERN: FIVE KEY SHIFTS



1

FROM RESEARCH CHARACTERISTICS TO RESEARCHER CHARACTERISTICS

Focus is shifting from the nature and use of research to who is conducting it, their affiliations, funding sources, and their publication and patent relationships.



2

FROM DISCLOSURE TO ELIGIBILITY

Foreign relationships that once primarily required disclosure can now affect whether federal funds can be used, whether risk mitigation is required, or whether a collaboration is permissible at all.



3

FROM AGENCY-WIDE SPECIFIC RESTRICTIONS TO GOVERNMENT-WIDE PROHIBITIONS

Federal agencies are increasingly using lists developed by another agency for a specific regulatory or national security purpose to identify persons and entities prohibited from participating in federally funded research.



4

FROM INSTITUTIONAL TRANSACTIONS TO CONTINUING RELATIONSHIPS

Review increasingly encompasses appointments, affiliations, outside support, co-authorship, patents, institutional agreements, and other ongoing relationships - not just the specific federally funded transaction.



5

FROM LEGAL REQUIREMENTS TO INSTITUTIONAL RISK MANAGEMENT

Even when a relationship is not expressly prohibited, uncertainty over how an agency will evaluate it can lead institutions to conduct additional review or decline collaborations.



WHY THIS MATTERS



International collaboration drives discovery, innovation, and economic growth.



Restrictions based on identity or affiliation - rather than research sensitivity - risk limiting the openness and impact of fundamental research.



Institutions should anticipate complexity, invest in clear processes, and engage early and often with federal sponsors.



Balancing research security with academic freedom and institutional mission is essential to sustaining a strong and open research enterprise.



CONSIDERATIONS FOR INSTITUTIONS



Know your sponsors. Understand each agency's evolving requirements, lists, and review processes.



Review early and regularly. Assess international collaborations at the outset and revisit as risks and requirements change.



Coordinate across your institution. Align research, legal, compliance, and leadership teams.



Document decisions. Maintain clear records of risk assessments and mitigation steps.



Plan for change. Have a contingency plan if collaborations that were previously permissible may no longer be tenable.

ADDITIONAL COGR ACTIVITIES & RESOURCES



Science & Security Requirements Matrix

Federal laws, regulations, and policies related to research security at-a-glance.

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Research Security Program Guidelines

COGR Overview of OSTP Guidelines for Research Security Programs at Covered Institutions.

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Issue Brief: Co-Authorship & Foreign Collaborations

Key considerations for institutions navigating international collaboration and co-authorship risks.

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Research Security Regulations: Practical Considerations for Technology Transfer Professionals

Guidance for technology transfer professionals on navigating research security requirements.

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