

International Research, Research Compliance, and Security Checklist

Compliance with Federal Guidelines

- Ensure all international engagements comply with federal agency guidelines, disclosure, and reporting requirements.
- Stay updated on evolving national security regulations and university policies.

Training and Resources

- Complete annual “Research Security” [CITI Training](#) if you are “responsible” (for the design, conduct or reporting of research) or a “covered individual” on a federal proposal/award.

NOTE: Completing one (1) of the three (3) Research Security courses listed below fulfills federal research security training requirements for “covered individuals”.

- Research Security Training (Combined) – NSF course in four 15-minute modules (1 hour).
- Research Security Training – NSF course in four 1-hour CITI modules (4 hours total)
- Research Security Advanced Refresher - CITI course of 8 modules. **Each** module takes approximately 20-30 minutes to complete.
- Ensure all proposals for external funding are submitted through appropriate ASU channels, with prior approval of funding sources.
 - Be aware that funding from [countries of concern](#) may lead to delays, loss of awards, or additional oversight requirements.
 - Note that past and present collaborations, even co-authorships, with researchers from countries of concern may be scrutinized.
 - Per federal sponsor Current & Pending requirements, all international collaborations, funded or unfunded, are required to be disclosed.
- Protect ASU’s sensitive data, including unpublished research information, intellectual property, and controlled and/or restricted information from unauthorized access or disclosure.
- Ensure only authorized personnel sign agreements on behalf of ASU, following [PUR 107 Contract Authority Policy](#).
- Review [ASU Research Security resources](#) related to international travel. Follow the processes outlined at [ASU International Travel](#).
- Maintain open communication with supervisors and promptly disclose financial interests, external agreements, and international collaborations (funded and unfunded).

International Travel Requirements

- Review [ASU Research Security resources](#) related to international travel. Follow the processes outlined at [ASU International Travel](#).
- Additional [approvals from ASU](#) leadership are required for travel to countries of concern (e.g., China, Russia, North Korea, Iran, Cuba).
- Notify and/or obtain sponsor approval as required for foreign travel.

Export Control Regulations

- Understand that export controls apply to:
 - Transfer of controlled technology, information, or goods to [foreign nationals](#) or sanctioned persons or countries, including transfers within the US.
 - [Engagements with restricted entities or individuals](#).
 - Disclosing controlled information (visual, hard copy or oral) to foreign nationals.
 - Providing services/training to operate or maintain controlled items to foreign nationals.
- Use the [Export Control Wizard](#) or consult the Institutional Compliance and Regulatory Affairs (ICRA) Export Control team at export.control@asu.edu for guidance.

Disclosure Requirements

- [Fully disclose](#) all funded and unfunded international collaborations/affiliations to ASU and sponsors. Disclose financial interests via ERA COI. Disclose all international collaborations to federal sponsors per sponsor specific requirements, examples - Current & Pending documents, RPPRs, Other Support, etc.
- Report [COIs and Conflicts of Commitment \(COC\)](#), including:
 - Consulting agreements
 - Sponsored funding
 - Outside employment
 - Research and scholarly activities
- Update disclosures regularly. Federal sponsors require updated disclosures at least annually and within 30 days of a change to an existing disclosure or acquiring a new financial interest.

Intellectual Property (IP) and Contract Authority

- Disclose Intellectual Property per [ABOR IP Policy](#).
- Follow [ASU's Contract Signature Authority](#) policy for all agreements.

International Remote Work

- Reviews and approvals may be required across ASU including ASU Tax Services, the employee's Unit, OHR, and export control.
- If ASU employee activity outside the US will be sponsor funded, review sponsored award terms and conditions for allowability first and obtain sponsor approvals as required.
- Work with your Unit to request an international remote work assignment in Workday.
- Ensure alignment with University Operations and research interests.

International Collaborations and Sponsored Research

In addition to where the work will be taking place, be mindful of sponsor policies and additional screening before collaborating with international organizations.

- Generally, entities in the US with less than 50% US ownership and/or control may need additional screening.
- Review [disclosures section](#) for all foreign collaborations, both funded and unfunded.

Foreign Sponsors

- Even if the originating sponsor is a US entity, additional screening is needed when ASU is receiving funds from a foreign organization.
- International sponsors will be screened by Research Operations.
- Agreements from an international sponsor may take longer to negotiate depending on the terms and conditions included.

Foreign Subawards

- For foreign organizations to receive Federal funds, they must be registered with SAM.gov. Refer to the specific funding announcement to confirm when required.
- Foreign subawardees will be screened by Research Operations.

Foreign Contractors, Vendors and External Consultants

- Always check sponsor guidance in the funding announcement and agreement to confirm whether foreign participation is restricted before engaging with foreign consultants or organizations to provide products or services.

ASU Policies to Review:

- [PUR 107 Contract Authority Policy](#)
- [ACD 204-01 Code of Ethics](#)
- [ACD 204-08 Conflicts of Interest](#)
- [RSP 206 Objectivity in Research - Disclosure of Conflicts of Interest](#)
- [RSP 214: Export Control](#)

- [RSP 215 Foreign Malign Talent Programs](#)
- [ACD 123 Misuse of University Assets](#)
- [ACD 125 Computer, Internet, and Electronic Communications Policy](#)

What can hold up award activation

- Outstanding proposal reviews
 - All investigator, department, and college proposal and cost share approvals must be secured in ERA before an award can be created in the system.
- Special Review items needing approval
 - [Institutional Review Board \(IRB\)](#) and [Institutional Animal Care and Use Committee \(IACUC\)](#) protocols
 - [Institutional Biosafety Committee \(IBC\)](#) submissions
 - Cultural review when project has [Tribal partnerships](#)
 - Approvals when research involves Scientific Diving
 - Approved technology control plans for export-controlled research.
 - Completed publication waivers if sponsored awards restrict publication of research results.
- Up-to-date COI disclosure
 - Disclosure is required at least annually, at the time of proposal application, and within 30 days of discovering a new significant financial interest.
- Sponsor and ASU required trainings
 - Conflict of Interest training for ASU personnel “responsible for the design, conduct and reporting of research”
 - Research Security training for “covered individuals” per Sponsor requirements
 - Check the [Responsible conduct training requirements](#) page to sign up for required trainings if NSF funded.
- Delinquent deliverables on other awards
 - If any award listing the PI has delinquent deliverables, even if unrelated or with a different sponsor, activation of the new award may be delayed until all deliverables are submitted per [RSP 509-02: Reports and Deliverables from Sponsored Projects](#).

Support & Assistance

- Contact Knowledge Enterprise (KE) Research Compliance for research security and export control consultations, training, or policy updates at export.control@asu.edu.

Additional Resources:

- Review [Insider Threat Awareness Training](#).
- Regularly review [ASU's International Research and Global Collaborations webpage](#) for [FAQs](#), [sponsor disclosure guidelines](#), and [additional resources](#).
- Regularly review [ASU's Research Security Program](#) webpage.