



Stony Brook University's Research Security Program

The Office of Research Security is responsible for SBU's Research Security Program. The [program](#) was created to assist faculty with compliance requirements (i.e., export control, disclosure, international travel, international activities, foreign influence, and cybersecurity) by providing information, guidance and resources. This interdisciplinary program is a collaboration between many university-wide offices in response to campus policies, sponsor requirements and federal regulations.

Reminder about Stony Brook University's Policy on International Engagements and resources available to assist with compliance with university policies, federal laws & regulations, and federal sponsor policies.

Let's discuss some ways that you can learn more about international engagements and risks, ask questions, or have engagements reviewed.

The Office of Research Security (ORS) offers a variety of ways to engage with our office and review information about international activities and risk.

You can:

- Attend an [International Activities and Risks webinar](#) hosted by the Office of Research. Webinars are currently scheduled for 12:30 to 1:30 pm on April 21, May 28, and June 11.
- Review the [International Engagements website](#)
- Review our [Newsletters and Campus Correspondence](#) on research security and international activities.
- Schedule an [appointment to meet with an ORS professional](#)
- Request an [international activity review](#) (easy to use forms - NetID and password required)
- Send an email to our [general Research Security mailbox](#)

Let's discuss the Policy on International Engagements ("Policy")

The [Policy on International Engagements](#) requires that international engagements that include, or potentially include, a "High Risk Activities" (further discussed below) be reviewed prior to engagement. These reviews are required to mitigate the potential for undue foreign influence, national security, and other compliance concerns as part of SBU's commitment to balance risks with SBU's research mission.

High Risk Activities

- Foreign Talent Recruitment Programs
- High Risk Entities
- Sanctioned/Embargoed Countries
- Countries of Concern
- Critical and Emerging Technologies

Who does the Policy apply to?

The Policy applies to:

- The SBU community
- International engagements that are related to a person's SBU Institutional Responsibilities

Institutional Responsibilities means an individual's professional responsibilities on behalf of the University, including, but not limited to, activities such as research, research consultation, teaching, professional practice, and membership/service on University committees and panels (e.g.: Institutional Review Boards, Data and Safety Monitoring Board, accreditation committees, etc.).

What do you need to know about High Risk Activities?

Some High Risk Activities are prohibited while others require prior consultation and/or approvals.

- Prohibits participation in Malign Foreign Talent Recruitment Programs.
- Prohibits collaboration with individuals or entities identified by the U.S. government as high risk ("High Risk Entities") without the prior written approval of the Research Security Program.
- Requires prior consultation with the Research Security Program before collaborating with an individual or entity in a country sanctions/embargoed by the U.S. government.
- Requires prior consultation with the Research Security Program before participating in international engagements with Countries of Concern.

For Critical and Emerging Technologies, the policy requires that:

- Researchers determine if their research is considered a Critical and Emerging Technology and if so, how malign foreign governments and their actors may be interested in their research.

What is a Foreign Talent Recruitment Program?

The U.S. government has defined Foreign Talent Recruitment Program (FTRP) and Malign Foreign Talent Recruitment Program (MFTRP). [Read more about the differences between these programs.](#)

What should you know?

- Many countries sponsor FTRPs for legitimate purposes of attracting talent.
- MFTRPs are most often in Countries of Concern but may include identified programs/institutions as determined by the U.S. government.
- Participation in a MFTRP is prohibited.

What should you do?

- Contact the Research Security Program if you are considering participation in any type of FTRP.

What is a High Risk Entity?

Entities and individuals that appear on a U.S. government restricted party list (i.e.; Entity List, Debarred List, Specially Designated Nationals and Blocked Persons, High Risk Entities also include entities identified on the FY22 Lists Published in Response to Section 1286 of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (Public Law 115-232) as amended).

What should you know?

- Stony Brook University has software that allows for the quick screening of potential collaborators and their employers/institutions. Instructions on how to conduct a screening and access to the software can be found on this [SBU Export Controls webpage](#).

What should you do?

- Screen potential collaborators, visitors, and other international activity partners.
- Contact the Research Security Program if you wish to, or currently are engaged with a High Risk Entity.
- International engagements with High Risk Entities are prohibited without the prior review and written approval from the Research Security Program.
- Many factors go into a review and determination including the entity, the reason why it is a High Risk Entity, the area of research (if applicable), and/or type of activity being

proposed.

What is a Sanctioned/Embargoed Country?

Countries that are sanctioned or embargoed by the U.S. Department of Treasury, Office of Foreign Assets. [Read more about Embargo and Sanction Programs](#)

What should you know?

- While most of these programs are financial sanctions there are some sanctions and embargoes that affect SBU activities.
- Sanction and embargo programs vary by country.
- Authorizations from the U.S. government (licenses) may be required for professional, research, and/or education activities in highly sanctioned/embargoed countries (e.g., Belarus, Cuba, Iran, North Korea, Russia, some areas of the Ukraine).

What should you do?

- Contact the Research Security Program if you want to engage with individuals/entities in a sanctioned or embargoed country.
- International engagements with countries that are sanctioned or embargoed are not prohibited but require prior consultation with the Research Security Program to ensure that any necessary U.S. government authorizations are obtained and/or documented.

What are "Countries of Concern"?

Countries identified by the U.S. government with military and related capabilities that may pose a significant threat to U.S. national security.

What should you know?

- Currently the Countries of Concern are China, Iran, North Korea, and Russia.

What should you do?

- International engagements with Countries of Concern are not prohibited but must be reviewed by the Research Security Program to ensure that there are no risks to the university, the individual, or their research opportunities/funding.

What are Critical and Emerging Technologies?

The U.S. government has identified certain advanced technologies that could be significant to national security. [View the Critical and Emerging Technologies list.](#)

What should you know?

- National security interests are more than military technologies and include protecting interests for the security, economic prosperity, and opportunity of the U.S. and defending democratic values.

What should you do?

- If your research is in the area of a critical and emerging technology, it is important to understand how this technology may be export controlled or subject to restrictions from a sponsoring agency. For questions regarding critical and emerging technologies, contact our [Export Control Compliance team.](#)

Other Considerations - Federally Funded Research

What should you know?

- Federal agencies have implemented a variety of policies and processes for identifying and countering undue foreign influence. More information is available on our website pages - [U.S. Federal Government Agencies & International Risk Assessments.](#)

What should you do?

- If you are funded by, or plan to submit a proposal to, one of these federal agencies it is important to understand the agency's disclosure requirements, prohibited activities, and risk review criteria. The Research Security Program can assist you with reviewing your international activities with federal sponsors you do, or wish to, engage with.

Case Studies

Case Study - Foreign Talent Recruitment Program

You have been offered an honorary title and travel money in exchange for the presentation of a few seminars. Is this allowable?

More information is needed:

- Does the exchange involve non-public information?
- Is it funded by, organized, or managed by an academic institution or a foreign talent program on lists developed under the National Defense Authorization Act, Section 1286?
- Is the entity in a Country of Concern?

If yes, to any of the above, then a further review is required to determine if the international engagement would be considered a MFTRP.

Case Study - High Risk Entities

You have been approached by a colleague of a colleague about the possibility of collaborating on a research project. You conduct a review, and their institution appears on one of the U.S. government lists. Your work does not include any sensitive technologies, is this allowable?

A review would be required, some of the initial questions would include:

- Which list does the institution appear on, there are numerous lists with differing types of restrictions.
- Do you have federal funding? If so, would this engagement jeopardize your federal funding?
- Would the project be for fundamental research - aimed at advancing international scientific understanding?
- Would you send or receive funding or materials?

Case Study - Sanctioned/Embargoed Countries

You would have been invited to attend a conference in a sanctioned/embargoed country? Is this allowable?

This depends on the country, for example:

- You would need a license to attend a conference in Iran.
- You would need to document a valid general license to attend a conference in Cuba.
- Sanctions would not prohibit you from attending a conference in Russia but other security concerns and perhaps the nature of the activity may prevent this activity.

Always consult with the Research Security Program before engaging in international activities that involve persons/entities in sanctioned/embargoed countries.

Request a Research Security review by [logging in with your NetID and password and completing a form](#) or [sending an email to our general Research Security mailbox](#).

Contact [Susan Gasparo, Director of the Office of Research Security](#) for assistance or questions.

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