

# Research and Sponsored Projects Manual (RSP)

## RSP 216: Research Security

Effective: 9/12/2026

Revised: N/A

### Purpose

To establish Arizona State University's Research Security framework to safeguard ASU research from unauthorized access, theft, improper influence, and other risks that may threaten research integrity, national security, or compliance with applicable laws and regulations.

### Sources

[A.R.S. § 15-1626](#)

[NSPM-33](#)

[OTSP Guidelines for Research Security Programs at Covered Institutions \(July 9, 2024\)](#)

### Scope

This policy applies to all individuals participating in, supporting, administering, or overseeing ASU research activities, including but not limited to:

- Faculty;
- Researchers;
- Staff supporting research activities;
- Students and trainees engaged in research;
- Visiting scholars and other research personnel;
- Individuals responsible for proposal development, sponsored projects administration, compliance oversight, or research operations.

This policy applies to all ASU research activities regardless of funding source.

### Definitions

**Research Security:** Means policies, practices, procedures, and controls designed to protect research activities, intellectual assets, information, technologies, data, and collaborations from risks including unauthorized access, theft, misuse, foreign interference, and other threats while preserving academic freedom and responsible international engagement.

**Covered Individual:** An individual designated by applicable federal, state, sponsor, or University requirements as subject to research security obligations, including applicable disclosure, training, certification, or reporting requirements.

### Policy

ASU maintains a Research Security Program as required by regulation and policy that promotes a culture of awareness, responsibility, transparency, and accountability to protect the University's research enterprise.

#### The Research Security Program :

1. Safeguards University research, intellectual assets, data, technologies, and research activities from unauthorized access, exploitation, or misuse;
2. Promotes a security culture to support and facilitate the responsible conduct of research through education, training, outreach, and guidance for individuals engaged in research;
3. Supports compliance with applicable federal, state, sponsor, and contractual requirements governing research security;
4. Identifies and mitigates risks associated with foreign influence, foreign affiliations, international collaborations, research partnerships, and other activities that may create research security concerns;
5. Protects academic freedom and supports responsible international research collaborations consistent with applicable requirements;
6. Establishes processes for reviewing and addressing research security risks while enabling efficient and ethical research operations.

ASU's Research Security Program includes the following components:

##### Cybersecurity

ASU maintains processes to protect research information, systems, and data consistent with applicable cybersecurity requirements, including requirements related to controlled information and federally supported research.

##### Foreign Travel Security

ASU provides guidance and requirements for individuals traveling internationally in connection with ASU research activities, including appropriate security practices and reporting requirements when applicable.

##### Research Security Training

ASU provides research security training and education to covered individuals to promote awareness of research security responsibilities and requirements.

##### Export Controls

ASU maintains export control processes to identify and manage activities involving export-controlled technologies, information, equipment, and services.

##### International Collaborations and Foreign Relationships

ASU maintains processes for reviewing research collaborations, partnerships, sponsors, and other foreign relationships when required to identify, mitigate potential and manage research security risks.

##### Disclosure and Transparency Requirements

Individuals participating in ASU research must comply with applicable disclosure requirements related to:

- Foreign affiliations;
- Foreign appointments;
- Research support;
- Financial interests;
- Conflicts of interest and commitment;
- Foreign Malign Talent Programs;
- Other required research security disclosures.

Failure to comply with this policy or applicable research security requirements may result in corrective action consistent with ASU policies and applicable laws, regulations, sponsor requirements, or contractual obligations.

Individuals must promptly report known or reasonably suspected research security concerns, policy violations, security incidents, inaccurate or incomplete disclosures, unauthorized access or sharing of research information, or potential

noncompliance with sponsor requirements. Concerns may be reported through appropriate University reporting channels to include ASU Ethics Hotline or direct reporting through supervisory channels.

ASU maintains processes that regularly review, revise, and update this research security policy to ensure continuing compliance applicable federal, state, sponsor, and institutional requirements. The policy is reviewed at least annually and updated as needed in response to changes in law, regulation, sponsor requirements, risk assessments, audit findings, or identified compliance concerns.

ASU maintains processes to identify, report, review, and address research security compliance. These processes include mechanisms for internal reporting, including confidential or anonymous reporting where permitted; escalation of significant concerns to appropriate university officials; documentation of reviews and findings; implementation of corrective actions when warranted; and external reporting when required by law, regulation, sponsor terms, or institutional policy.

## **Roles**

### **ASU Leadership**

ASU leadership is responsible for supporting institutional research security objectives and ensuring appropriate resources and oversight.

### **Compliance**

Compliance is responsible for administering and coordinating ASU's Research Security Program, including:

- Developing guidance and procedures;
- Providing education and outreach;
- Coordinating institutional reviews;
- Supporting compliance with applicable requirements;
- Maintaining program oversight.

### **Researchers and Covered Individuals**

Individuals engaged in research are responsible for:

- Completing required training;
- Providing accurate and complete disclosures;
- Protecting research information, data, and resources;
- Following applicable laws, regulations, sponsor requirements, and University policies;
- Reporting suspected research security concerns.

### **Research Units and Academic Units and Administrative Offices**

Research units and Academic units and administrative offices are responsible for supporting implementation of research security requirements within their areas of responsibility.

## **Cross-References**

- [ASU Research Security Program](#)
- [ACD 204-08: Conflict of Interest](#)
- [ACD 510-01 Notification of Consulting or Other Outside Business Activities or Arrangements for Faculty and Academic Professionals](#)
- [RSP 206: Objectivity in Research](#)
- [RSP 214: Export Control](#)
- [RSP 215: Foreign Malign Talent Programs](#)
- [Knowledge Enterprise \(KE\) - Office of Research Compliance](#)