

Austin Peay State
University

Research Integrity and Security Policy

POLICIES

Issued: December 11, 2024
Responsible Official: Provost and Senior Vice President for Academic Affairs
Responsible Office: Office of Research and Sponsored Programs

Policy Statement

It is the policy of Austin Peay State University to safeguard its academic research from foreign adversaries and undue foreign influence.

Purpose

In compliance with T.C.A. § 49-7-188 and applicable federal regulations, Austin Peay State University (APSU) is committed to safeguarding its academic research from foreign adversaries and undue foreign influence. This policy ~~promotes~~ fosters a culture of security, supports national security interests, and ~~protects~~ ensures the integrity of research conducted at APSU. The policy framework adheres to all legal, regulatory, and contractual standards and is designed to ensure compliance with federal regulations, maintain eligibility for federal funding, and mitigate threats to the APSU's research environment.

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Definitions

U.S.-designated foreign adversaries

Countries, entities, or individuals identified by the U.S. government as posing a threat to national security or the interests of the United States. These adversaries may engage in activities such as espionage, cyber-attacks, or other forms of interference that compromise the integrity of U.S. institutions, technologies, and intellectual property. The designation is typically made by federal agencies, including the Department of State, Department of Defense, and Department of Commerce.

A list of U.S.-designated foreign adversaries can be found on U.S. government websites, which are regularly updated. Since these websites are frequently modified, they are not specified in this policy. University personnel are encouraged to contact the Office of Research and Sponsored Programs (ORSP) for the latest information.

Scope

This policy applies to all faculty, staff, students, and external collaborators engaged in research activities at Austin Peay State University. It covers research conducted on all campuses, institutes, and other internal components of APSU, particularly those involving [US government Controlled Unclassified Information \(CUI\)](#) and [other materials and hardware controlled by US laws or regulations](#)~~sensitive or export controlled data~~.

Procedures

Research Security

1. The Provost and Vice President for Academic Affairs may designate a Chief Research Integrity Officer (CRIO) as the point of contact for all matters related to this policy.
2. To ensure that the university remains eligible for federal funding, the university and individuals conducting research at APSU must comply with applicable laws, regulations, and contractual obligations for securing and protecting research. The principal investigator, in coordination with the CRIO, has primary responsibility for ensuring that the research is conducted in accordance with applicable legal and contractual requirements.

3. Any research or scholarly activity that is funded by a source other than a federal or state agency and that a reasonable person would believe potentially implicates national security interests must be reviewed and approved by the Provost and Vice President for Academic Affairs or designee. Such review does not replace any required IRB or other administrative approvals.
4. Research activities, at a minimum, must comply with the cybersecurity requirements established by the university. APSU encourages individuals engaged in research activities to take additional protections with respect to any research that might implicate national security concerns or that might be of significant value to a foreign adversary.
5. APSU encourages individuals engaged in research activities to complete training modules made available by the National Science Foundation and other U.S.-based agencies, to enhance their understanding of best practices and compliance related to research security and integrity.
6. APSU shall require any individual who performs research on an export-controlled technology (such as CUI, export controlled technology or International Traffic in Arms Regulations controlled technology), as well as individuals who will have access to related materials, to complete training on U.S. export control and compliance requirements. The University may comply with this requirement through the administration of relevant training provided by the Bureau of Industry and Security in the federal Department of Commerce or the Directorate of Defense Trade Controls in the federal Department of State. University employees should contact the Office of Research and Sponsored Programs for any questions concerning required trainings.
7. Unless the Provost and Vice President for Academic Affairs designates another person, the CRIO is responsible for:
 - A. Maintaining publicly accessible contact information for the IRB; and

Commented [BC1]: A recommendation was to say, “any type of research or scholarly activity” regardless of funding or not – meaning, anything that a person does on their own time, could be considered reviewable by an authority. After some thought, I disagree as this leads to a form of McCarthyism and 1984ism. I do understand the notion that this policy could help good people from making security mistakes but I lean toward “freedom and trust” than leaning toward “preventing incompetence and mistrust.”

Also, any FUNDED-research/scholarly activity has a workflow that automatically has oversight. We would have to invent a new process for nonfunded activities that are considered national security risks.

Yes, sometimes, faculty can be individually funded to do research/scholarship and that funding goes directly to the faculty (i.e., ORSP never sees it), but that is actually an individual contract which requires the employee to submit external employment following policy 5:014 Outside Employment and Extra Compensation.

Commented [BC2]: ORSP has recently added a CITI training module for foreign influences and export controls (at \$625/FY, if curious).

B. Facilitating the distribution of communications
designed to enhance research security.

8. Led by the CRIO, ~~Research~~ security protocols shall be continuously ~~improved~~ ~~enhanced~~ to address ~~new and~~ emerging research security threats. The university's research security policies ~~should~~ ~~must~~ be reviewed and revised as necessary, but no less than every five years.

Given the expertise required to navigate diverse security threats, procedures, and policies, a committee of experts is necessary to ensure compliance with state and federal regulations. The CRIO shall lead this committee, which will include representatives from key university areas, with flexibility to add members as needed. Membership may be adjusted in response to changes in U.S. relations, regulatory updates, or shifts in university administration.

The committee will convene as necessary based on the expertise required for specific issues. As U.S. national security continues to evolve due to foreign policy, global events, and emerging technologies, the committee's composition will remain adaptable and fluid.

Research Integrity and Security Committee (RISC):

- Chief Research Integrity Officer (CRIO) – Chairperson of the RISC
- Chief Information Officer (CIO) – Co-chairperson of the RISC
- Chief Internal Audit Officer (CIAO) – Co-chairperson of the RISC
- University Legal Counsel – Co-Chairperson of the RISC

And, as needed, representation from:

- University Business Administration
- University Office of Research and Sponsored Programs
- University Office of Human Resources
- University Office of Procurement
- University Intellectual Property
- University Foundation and Philanthropy
- University Division of Military Affairs
- University Government Affairs
- University Admissions
- University Campus Facilities and Safety
- University Office of International Programs

Commented [BC3]: Frankly, as a biologist speaking for myself, I do not have the expertise or ability to:

1. Recognize threats beyond my career experiences (e.g., CDC/NIH).
2. Modify workflows and policies outside my area of expertise.
3. Provide proof of compliance for mitigating threats unrelated to my career.

Therefore, I strongly believe that forming a committee is essential and in the best interests of APSU.

Yes, the acronym is awesome! :)

Recognizing that University reorganizations and personnel transitions can occur more rapidly than policy review and renewal cycles, this policy specifies key university areas while also including broader designations that should align with most future reorganizations. This approach ensures that the appropriate committee members are consistently identified, allowing for continuity and clarity during periods of organizational change.

Reporting

1. Any person who has a concern about research security or undue foreign influence must report the concern to the Chief Research Integrity Officer (CRIO), the Office of Research and Sponsored Programs (ORSP), the university IRB chairperson, and/or the Office of Internal Audit.
- +2. Once concerns are reported to one or more of the designated areas, they will be promptly reviewed and addressed in accordance with the appropriate university policies, procedures, and established timelines.

Relevant Policies

[1:001 Conflict of Interest](#)
[1:002 Code of Ethics for Members of APSU Board of Trustees](#)
[1:003 Duties of the President](#)
[1:022 Budget Principles and Control](#)
[1:024 Board of Trustees Delegation of Authority](#)
[2:019 Misconduct in Research and Other Creative Activities](#)
[2:055 Research and Scholarly Activities](#)
[2:057 Grants Award and Declination Policy](#)
[2:058 Grants Management: Budgeting, Spending, and Responsibilities](#)
[2:059 Sponsored Research Incentive Program](#)
[2:060 Indirect Cost and Salary Recovery](#)
[2:061 Time and Effort Reporting for Grant-sponsored Activities](#)
[4:002 Delegation of Authority for Approval and Execution of Contracts and Purchase Orders](#)
[4:003 Access to and Use of Campus Property and Facilities by Affiliated Individuals/Entities](#)
[4:007 Access to and Security of Facilities](#)

[4:008 Deposit and Investment of Funds](#)
[4:009 Accounts Receivable Collections](#)
[4:013 Contracts](#)
[4:014 Purchasing](#)
[4:015 Travel Policy](#)
[4:016 Reports of Expenditures by the President](#)
[4:017 Records Retention and Disposal of Records](#)
[4:019 Disposal of Surplus Personal Property](#)
[4:023 Corporate Card](#)
[4:029 Acceptable Use of Information Technology Resources](#)
[4:030 Connecting Network Extension Devices & Server Services to the Campus and Residence Networks](#)
[4:035 Fixed Assets and Sensitive Minor Equipment](#)
[4:042 Information Security and Data Classification](#)
[5:009 Moving Allowance](#)
[5:014 Outside Employment and Extra Compensation](#)
[5:017 Charitable Organization Campaigns and Contributions](#)
[5:018 Employment of Law Enforcement and Security Personnel](#)
[5:019 Employment Classification](#)
[5:043 Employee Code of Conduct](#)
[7:003 Austin Peay State University World Wide Web Policy](#)
[7:008 Foundations](#)
[8:002 Athletic Recruiting - Official and Unofficial Visits](#)

Revision Dates

APSU Policy 2:068 – Issued: December 11, 2024

Subject Areas:

Academic	Finance	General	Human Resources	Information Technology	Student Affairs
<input checked="" type="checkbox"/>					

Approved

President: (sign upon approval)

