

Considerations for Effective International Visitor Reviews

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Why is this Important?

- In 2021, the NSTC through its Joint Committee on the Research Environment (JCORE) released “Recommended Practices for Strengthening the Security and Integrity of America’s Science and Technology Research Enterprise”.
- There are 21 total recommendations in this document directed at research organizations.
- Recommendation #20 is “Managing Potential Risks Associated with Foreign Visitors and Visiting Scholars”.

- It further states:

“...research organizations should develop and deploy through the organization’s export control, research compliance, or international affairs office, when they plan to have foreign visitors come to visit campus and/or tour their laboratories.”



These Visitor Requirements Could Include...

1. Requiring research personnel to alert organization officials, potentially through the organization's export control, research compliance, or international affairs office, when they plan to have foreign visitors come to visit campus and/or tour their laboratories;
2. Requiring research personnel to provide justification to organization officials of the research value of long-term visitors and visiting scholars;
3. Requiring that foreign visitors participate in training on research security and responsible and ethical conduct of research;
4. Screening against available lists of restricted or denied parties, including the Consolidated Screening List;
5. Taking measures for securely hosting and escorting foreign visitors, including measures to avoid unauthorized information gathering.



Visitor Program Discussion Points

Based on the JCORE Research Security Recommendations, there are 5 distinct discussion points we will go over:

1. Process
2. Decision Making
3. Legal & Training Requirements
4. Export Controls/Research Security Vetting Process
5. Hosting and Monitoring



A tall, yellow, Gothic-style building with many windows, set against a blue sky with a small moon. The building is partially obscured by a large blue curved shape on the left side of the slide.

University of Pittsburgh

Institution Type: Private State Affiliated

Research Portfolio: \$915 million, Biomedical focus, also strong philosophy, engineering and computer science

Types of Research Accepted: Predominantly FR, restricted research (including CUI) on an “exception” basis

Formal Visitor Process? Yes

Owner: SVC Research/Trade Compliance

Formal Policy or Informal Procedure/Guidance: Guidance

Website: www.visitor.pitt.edu



University of Pittsburgh

- 1. Process:** Defined Academic Visitor Process described at: <http://visitor.pitt.edu/>. Category 2 (>14 days) and Category 3 (lab/clinical activities regardless of length) Visitors must follow procedures which include: invitation letter/SOW, visitor participation agreement, clinical/lab addendum, MyEC Export Controls Review, Integrated RPS, and Embargoed Country Check.
- 2. Decision Making:** Schools and departments decide who to invite, but must follow MyEC security checks to identify any high risk components (RPS hit, unusual SOW etc.). The SVC Research retains final decision making for any higher risk visit.
- 3. Legal/Training Requirements:** Training requirements determined by SOW and enforced by host at the department/school level. COI submission, and RCR training mandatory for long term visitors. Visitors held to Pitt IP and other standard policies through visitor agreement.
- 4. Export Controls/Research Security Vetting Process:** MyEC electronic process captures information that is used for automatic RPS, embargoed country checks, and integrated RPS. EC reviews are done on all higher risk STEM activities while RPS and embargoed country checks are conducted on all long term visits.
- 5. Hosting and Monitoring:** Schools and departments are responsible for hosting and monitoring visitors and may contact OTC if questions or concerns arise.



Pacific Northwest National Lab

Institution Type: U.S. Government Research Facility

Research Portfolio: \$1.24B with emphasis in Nuclear Materials, Earth Sciences, Chemistry, Biology, Data Science, Sustainable Energy, Energy Storage, Material Sciences, Threat Analysis, National Security

Types of Research Accepted:, Fundamental, Controlled, Classified

Formal Visitor Process (Y/N):Yes

Owner: Safeguards and Security (FVA Program, Export Control, Others)

**Formal Policy or Informal Procedure/Guidance: Formal Policy & DOE Order 142.3B
(UNCLASSIFIED FOREIGN NATIONAL ACCESS PROGRAM)**

Website: <https://www.pnnl.gov/visitors>



Pacific Northwest National Lab

- 1. Process:** Requires authorization prior to accessing PNNL property or systems. Staff Member identifies FVA host and schedule. Hosts must be U.S. Citizen or LPR. Hosts seeks management approval to proceed. Hosts and Staff member determine requirements and gather information. Host determines if there is a need to access any sensitive assets or information. Host works with Non-U.S. Citizen to gather necessary information. Hosts determine access needs and completes a Security Plan and Risk Assessment (SPRA). FVA Technicians review the SPRA for completeness, accuracy, and special requirements.
- 2. Decision Making:** FVA technician routes the SPRA to Lab SMEs including Technology Protection and Export Control (TPEC), Counterintelligence, Field Intelligence Unit, Human Resources, Directorate delegates, FVA administrator, and Lab Director Approval Authority. Review work scope (projects) locations, equipment and data access.
- 3. Legal/Training Requirements:** Prohibited Controlled Articles and Activities, Non-Staff Orientation, others as needed.
- 4. Export Controls/Research Security Vetting Process:** Screening against available lists of restricted or denied parties, including the Consolidated Screening List; Review project work scope (FRE review), location and equipment access. Conduct license screening. Work with Hosts, FVA office and others to modify SPRA as appropriate.
- 5. Hosting and Monitoring:** The hosts may ask additional escorts to be available for FVA. Hosts are responsible for maintaining the accuracy of the SPRA. Safeguards and Security staff monitors various systems for expanded scope and time billing.



University of Florida

Institution Type: Public Land-grant Institution

Research Portfolio: \$960 million in research expenditures; comprehensive research institution with diverse portfolio including engineering, life sciences, physical and social sciences, pharmaceuticals, and medicine.

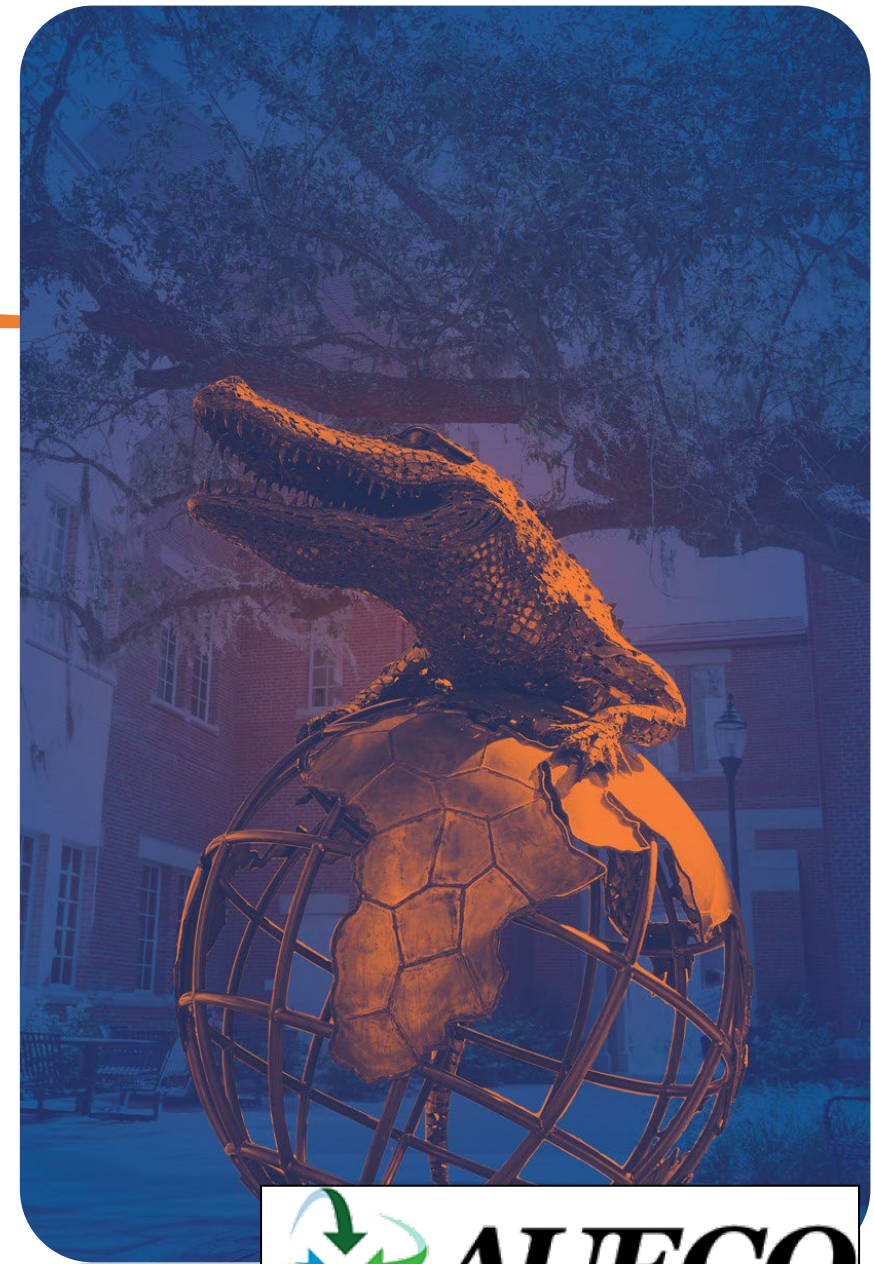
Types of Research Accepted: Fundamental, Controlled, Classified

Formal Visitor Process: Yes

Owner: UF Research, managed through UF Research Integrity, Security, and Compliance (UF RISC)

Formal Policy or Informal Procedure/Guidance: [Formal UF Policy](#), indicating procedure and process.

Website: <https://research.ufl.edu/compliance/international-engagement-and-collaborations/international-scholar-visit.html>



University of Florida

1. **Process:** UF RISC reviews International Visitors and Scholars through an online portal, including J-1 applicants sponsored by UF. Visitors do not include students. A submission is required to include identifying information, research abstract, funding information and the visitor's CV.;
2. **Decision Making:** Matrix based on pre-determined risk factors, approval with mitigation in certain circumstances, specific risk factors elevate to the ECO, Director, of VPR for approval/denial;
3. **Legal/Training Requirements:** State of Florida requirements, training based on specific research project involvement;
4. **Export Controls/Research Security Vetting Process:** Review of engagements using restricted party screening, elevate to ECO when pre-determined export controlled indications are present;
5. **Hosting and Monitoring:** International Visitor Engagement Plan for visits indicating pre-determined risk factors. Plan includes attestation from visitor requiring compliance with EC Policy. Faculty responsibility for adherence to plan.



Questions



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