

| NU-RESearch Quarterly

A research compliance newsletter focused on raising awareness across the NU research enterprise

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POTENTIAL MALWARE IN THE BLACK-BOX: Why should NIH's new policy on AI concern you?

By Wilson Mazile

Peer-review systems seek to mitigate human bias in research. However, depending on the proposal or article, peer-review may be an arduous and time-consuming task for reviewers. Supporters of the use of artificial intelligence (AI) in research theorize that generative/natural language technologies can be used in peer-reviewed research to detect and mitigate human bias in empirical analysis and predictive modeling, which are essential to validating and regulating scholarly work. Critics of AI in research point out that an AI model can learn and perpetuate human bias if it is trained by data that contains biases and/or the underlying algorithms contain bias.

OpenAI's ChatGPT has become one of the world's most popular open-source AI tools. ChatGPT is a generative AI tool that performs many functions: (summarizing long documents, text generating, learning assistance, coding support, and task automation), which are powerful functions that can be useful in the peer-review process. ChatGPT and other generative/natural language technologies rely on two computation processes called machine-learning and data mining. Data mining allows ChatGPT to store hundreds of millions of queries, prompts, and other records in repositories known as data lakes where they are extracted to train and improve the chatbot's language model in future interactions with a user. So, when one uses ChatGPT, it stores both the inputs and outputs to refine its algorithms, thus, machine-learning. These processes can be flawed as the technology can harbor limited trained datasets, potential inaccuracies, and data breach concerns.

Since its launch in late 2022, the research world has debated the potential regulation scheme for its usage in research outputs because of concerns related to data security and data mining.

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SPECIAL POINTS OF INTEREST

- Cybersecurity Certifications
- A New IRB Resource Library
- Navigating PETA's Tactics
- Policy Updates
- International Shipping Guidance
- Reflecting on our Summer Workshop

NAVIGATING PETA'S TACTICS: THE PUBLIC RECORDS TRAP

By Curtis Van Slyck

People for the Ethical Treatment of Animals (PETA) is notorious for its confrontational public relations tactics. However, beneath the flashy façade, PETA employs lawyers, analysts, and strategists who meticulously sift through research publications and public records to identify targets for their campaigns.

Recently, Oregon Health & Sciences University (OHSU) was ordered to pay nearly \$430,000 to cover PETA's legal costs and compensate for delays in responding to a public records request for photo and video recordings of animal experiments published in a 2017 report. This outcome is undoubtedly a significant victory for PETA: despite the judge's ruling that OHSU did not violate public records laws and that the delay in delivering the requested items seemed to be the result of a sincere misunderstanding, the university's payment still creates the impression of an admission of wrongdoing in the eyes of the public.

This incident is just the latest example in PETA's extensive history of exploiting public records laws and the Freedom of Information Act to obtain information about animal research activities. They seek potentially sensationalist headlines in an effort to portray researchers' actions as inhumane. Consequently, researchers working with animals must be cognizant of these tactics and take them into account when deciding whether and how to produce, store, publish, or destroy photos and videos of live animals.



POTENTIAL MALWARE IN THE BLACK-BOX: *Why should NIH's new policy on AI concern you?*

Continued from page 1.

The NIH's Peer-Review Policy on Security and Confidentiality (NOT-OD-22-044) is an agreement ensuring researchers' work will be handled and evaluated responsibly. The NIH's peer-review process involves a selection of experts who are asked to provide their individualized expertise in assessing the potential of a specific grant application for NIH funding. Currently, most generative AI technologies are severely flawed and limited in their ability to validate empirical research effectively, as bias is built into the data mining. This bias can compromise reviewers' evaluations and, over time, may result in plagiarism or the homogenization of grants awarded.

In June, the NIH released a notice clarifying NOT-OD-22-044 to prohibit scientific peer reviewers from using AI technologies, such as natural language processors, for analyzing and formulating critiques of grant applications and R&D contract proposals. This NIH Notice also clarifies that reviewers must not share NIH content with online generative AI tools like ChatGPT, as it violates peer review confidentiality and integrity requirements.

While AI holds tremendous potential to enhance and streamline the peer-review process, research institutions must continue to monitor and mitigate its risks associated with data mining and machine-learning.

Northeastern is in the process of developing guidelines for the use of generative AI in research. In the meantime, faculty should be aware of the drawbacks associated with ChatGPT and other generative AI tools to ensure the security and integrity of research data.



HOW WELL DO YOU KNOW YOUR BUSINESS PARTNER?

By Tessa Seales

As we enter the era of research security programs and working with the framework of “as open as possible, but as closed as necessary”, there are several risk mitigation techniques that can be utilized to ensure researchers and institutions are protected when entering international partnerships or collaborations. Two of these techniques include due diligence and disclosure of international engagements and due diligence.

The release of [NSPM-33](#) brought attention to the United States government’s goals of protecting the US research enterprise against foreign interference¹ with mandatory research security programs for institutions receiving more than \$50 million in federal research funding per year.

The first risk mitigation technique is due diligence or knowing your business partner. Conducting robust due diligence will facilitate strong, successful, and mutually beneficial international partnerships, while simultaneously minimizing harm to the institution and the sector. Due diligence helps to identify risks where potential partners may want to engage/collaborate in bad faith, are seeing benefits beyond the terms of the agreement, extending activity beyond what was state in the agreement, or are unaware of misalignment between ethical standards.

At Northeastern, NU-RES Research Compliance conducts due diligence at the individual and the entity level. At the individual level, we conduct restricted party screening (RPS), and we assess an individual’s CV/resume. This tells us what their academic credentials, relationships and employment are, and helps us determine if what they have studied aligns with what they would be studying and/or researching at the university. At the entity level, we also conduct RPS, but we specifically look for financial and managerial information:

- Does the institution have transparent financials posted online?
- Do we know anything about the management team?
- Are they allowed to do business with the US?
- How long has the institution been around, is it new or 100 years old?
- What is it like to do business in said country?

US funding agencies want to know that the grantee has reviewed financials and is willing to do conduct desk audits for certain projects. Most US/UK/European entities have audits available online as do publicly traded companies. Most information can be found on Google, including in many countries-information related to lawsuits and ties to the government. We also examine the scope of the proposed project and the extent to which data and information might be exchanged. A single project is different than establishing a center or an ongoing long-term partnership. Some funding agencies in the US prohibit funding to entities in certain countries, such as China or Russia. Some considerations we may ask:

- What kind of data is being exchanged?
- Is the flow of data going to be bi-directional?
- Where and how will the work take place?



Our role is not to make any value judgements about the individual, country, or entity, but rather to understand their context, and most importantly what are the risks of entering into a partnership with a foreign individual or entity.

NSPM-33 also includes new disclosure requirements with the goal of standardizing these requirements across research agencies to the greatest extent practicable. Institutions will be required to provide clarity regarding disclosure requirements, disclosure processes, and expected degree of cross-agency uniformity. Institutions will also be required to collect information related to financial conflicts of interest within research and development (R&D) award application processes. Lastly, there are also requirements for disclosing involvement and participation in foreign programs. This last requirement comes on the heels of recent cases against prominent US faculty members involving failure to disclose foreign program involvement, the most recent involving Dr. Charles Lieber, former Chair of Harvard University’s Chemistry and Chemical Biology Department (see “A Sentence Handed Down” article). Lieber failed to disclose numerous financial and non-financial conflicts of interest, which the US government is aiming to mitigate with these disclosure requirements.

We encourage researchers to perform due diligence reviews of the individual(s), organization and/or entity they wish to do business and to reach out to NU-RES Research Compliance proactively prior to entering into an agreement.

DO YOU REMEMBER? *A Reflection of a Significant Moment in Research Compliance History*

Remembering Jesse Gelsinger

By Paula Robinson

From the outside looking in, Jesse Gelsinger was a typical teenager living in Arizona with his family. He went to school, took interest in wrestling in his free time, and worked as a clerk at the local grocery store. He could be described as smart and independent. At the age of 2, he was diagnosed with a very rare disorder called Ornithine Transcarbamylase Deficiency Syndrome (OTCD), which essentially causes a dangerous buildup of ammonia in the bloodstream. Most diagnoses with OTCD take place shortly after birth and unfortunately most patients experience an extremely short lifespan of less than a month following the diagnosis. That said, Gelsinger sustained a much milder version of the disorder. While Gelsinger had to comply with doctor's orders of a low protein-diet and follow a strict medicinal regimen of roughly 50 pills daily, he was able to live a relatively normal teenage life.

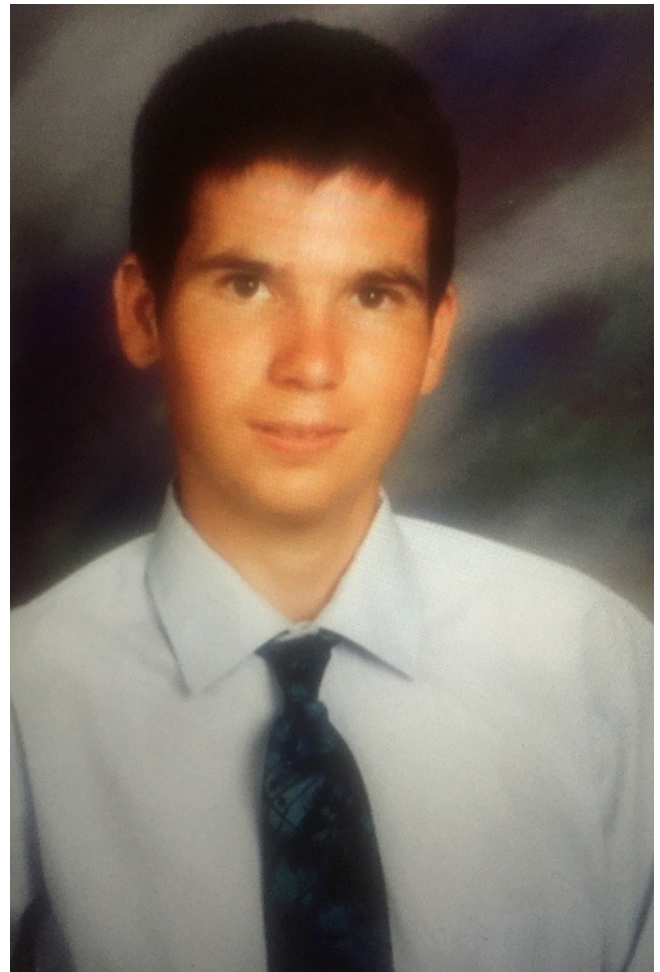
In the midst of managing his health, Gelsinger's doctor suggested a gene therapy treatment trial taking place at the University of Pennsylvania (Penn). Essentially, Penn's research worked on developing enzymes that prevent the ammonia buildup, and the healthier gene would be attached to a virus and then injected into the patient. The virus was designed to be minimally harmful to the health of the patient. The virus injected was intended to target the liver cells and ultimately integrate the working gene into the patient's DNA.

Because patients with this diagnosis were typically newborn babies with a very short life expectancy, this study was simply in place to broaden our existing knowledge of the disease. That said, Gelsinger understood he was not going to recover from his illness. Gelsinger unfortunately experienced tragic effects from the trial and passed 4 days later.

Following the investigation by federal health officials, three serious missteps were identified. The first being faults in the process by which the researchers selected participants. The Principal Investigators argued that adults affected by OTCD could reason better and weigh their options, despite the trial being best fit for infants. Leading up to the trial the FDA requested that the investigators make modifications to the eligibility requirements as the applicant pool was too broad. Those modifications were never made. Gelsinger's pretrial results showing he was unfit for the trial, were never recorded properly. This then leads to the second ethical oversight: informed consent. Per the Belmont Report it is imperative that those participating in a study are fully informed of risks associated with participation. It was later found that others provided with the gene therapy had suffered severe complications, and in some cases, terminal consequences. This information was not provided to the Gelsinger family. Lastly, the lead investigator had a significant conflict of interest that was undisclosed; the investigator held stake in the company that owned the gene transfer

technology being used in the study. If this study was successful, the investigator stood to earn a handsome profit. Had the conflict been disclosed, the investigator would have been removed from significant decision-making roles where his biases could have, and did, interfere with the integrity of the work.

While the most significant tragedy was the loss of a life, the damages had lasting impacts beyond this study. In addition to the discontinuation of the OTCD study, Penn's gene therapy program was ultimately discontinued. Consequently, Federal sponsors became reluctant to sponsor research related to gene therapy, and progress in the field significantly slowed over the next 20 years. Industry sponsors ultimately revived gene therapy research and were able to eventually develop safer alternatives, but the public as a whole experienced a great loss.



INTRODUCING A NEW IRB RESOURCE LIBRARY

By Erik Williams

The Human Subject Research Protection Program is excited to announce the launch of a new resource library designed to demystify IRB processes and expectations for investigators, administrators, and staff. The library includes templates and writeups about topics such as the 7 basic criteria for IRB review, participant payment tracking, and establishing reliance agreements for collaborative research. We're committed to ensuring that you have the knowledge and tools necessary to navigate the regulatory requirements seamlessly.

Our library of resources is a work in progress, and we are creating and identifying additional resources to add to the library. We would love to hear any suggestions or recommendations for new resources to add to the library. Send any feedback to: IRBReview@northeastern.edu

The resource library can be accessed [here](#).

GOVERNMENT EXPANDS TIKTOK BAN TO CONTRACTS

By Amanda Humphrey

In 2022, a new law was passed that prohibited government employees from accessing ByteDance's TikTok app on employee devices. Governments in the [European Union](#), [Canada](#), [the UK](#), and [other countries](#) have also banned TikTok from employee devices.

The US government is now expanding that ban to personnel working on government contracts. In June, a new FAR clause was issued that goes into effect on July 3rd, 2023, for all new and ongoing federal contracts. Here are some FAQs to help you understand if this clause will impact your research and how to manage it.

Why ban TikTok?

Apps can collect information from other apps or gather data from your phone use, even if the app itself is not open. There have been concerns that TikTok is gathering user data and passing it to the Chinese government, which other governments have accused the Chinese government of using to spy on their citizens and surveil specific individuals, [such as journalists](#).

What does the FAR clause require?

The FAR clause prohibits the TikTok app from any device utilized in the course of the federal contract. Since you would likely communicate about your government contract through email, you cannot have both your NU email and TikTok installed on personal devices. The ban does not include an exception for incidental use because of the underlying concerns that the TikTok app is collecting a wide range of user data. The ban also does not provide a distinction between types of personnel working on the contract

therefore it applies to everyone on a contract's project team, including students!

How will I know if this applies to any of my projects?

NU-RES will notify you during the award obligation set up process of this new requirement and provide a link to relevant FAQs. You may also see it in a PI memo for new contracts. Our export compliance team is also adding a reminder to our Technology Control Plan (TCP) template and training documentation. For clarity, this does NOT apply to grants or cooperative agreements.

What will be required of the PI to facilitate compliance?

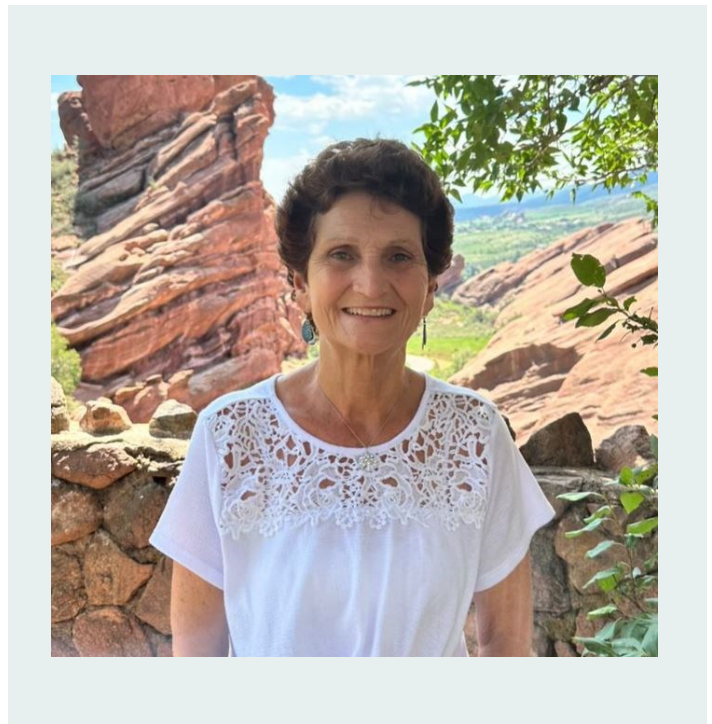
- Communicate the requirement to the entire project team, including students. We recommend providing them with the email you receive from NU-RES with the link to our resources.
- If you have both TikTok and access to Northeastern email on your personal devices, please remove either your work email or TikTok from each device.
- Contact us with any questions: researchcompliance@northeastern.edu
- If you would like more information, we recommend reviewing the write-ups in [National Defense Magazine](#) and [JD Supra](#).

HUSKY HEROES **RECOGNIZING THOSE WHO SERVE ABOVE AND BEYOND TO SUPPORT RESEARCH**

BY WILSON MAZILE

Anne Magrath

Our featured NU-RES Husky Hero for this Summer issue is Anne Magrath! Anne is the Senior Director – CENSSIS-ALERT-SENTRY-PROTECT Centers at the Bernard M. Gordon Center for Subsurface Sensing and Imaging Systems. She has been working at Northeastern for 38 years and is dedicated member of the NU-RES community. This section will showcase an interview with Anne and why she is our featured NU-RES Husky Hero for this Summer issue.



What is your background? Where were you before you started working here at Northeastern?

Growing up in East Boston and Winthrop, MA., I started here at Northeastern University in July 1985, and I have been here for 38 years. That is under four University Presidents, I guess I would consider myself as a lifelong employee. I have worked in Accounts Payable, Physics, Chemical Engineering, and have been in Gordon-CENSSIS since 2001 working with Professor Michael Silevitch, Professor Carey Rappaport, Professor Akram Alshawabkeh, Deanna Beirne, Kristin Hicks and so many other wonderful faculty and staff.

Could you briefly describe your current role here at Northeastern University?

Today, I am the Senior Director Finance – CENSSIS-ALERT-SENTRY-PROTECT. I manage all the non-scientific aspects of center-related finances, operations, and administration management. I work on pre & post-award for many multi-disciplinary and multi-institutional research awards along with other research projects, so I witness the cradle-to-grave lifecycle of grant management.

In 2001, I started working for The Bernard M. Gordon Center for Subsurface Sensing and Imaging Systems (Gordon-CenSSIS), which now is a graduated multi-university NSF Engineering Research Center. Its mission is to revolutionize the existing technology for detecting and imaging biomedical, environmental, or geophysical objects or conditions that lie underground or underwater or are embedded in the human body.

In 2008, the team transitioned to focus on the Emeritus ALERT (Awareness and Localization of Explosives-Related Threats) Center. A multi-university, Department of Homeland Security Center of Excellence (COE), the ALERT Center seeks to conduct transformational research, develop technology, and provide educational development to improve effective characterization, detection, mitigation, and response to explosives-related threats facing the country and the world.

In 2010, the team was awarded the National Institute of Environmental Health Studies (NIEHS) P42 PROTECT (Puerto Rico Test Site for Exploring Contamination Threats) Center. PROTECT is a multi-project, multi-institution collaboration that involves five primary institutions and five collaborators. The PROTECT Center studies exposure to environmental contamination in Puerto Rico and its contribution to adverse pregnancy outcomes, including preterm birth (less than 37 completed weeks of gestation). Rates of preterm birth and infant mortality in Puerto Rico are among the highest of all US states and territories.

In 2021, the team transitioned to focus on SENTRY (Soft Target Engineering to Neutralize the Threat Reality), a multi-institution Department of Homeland Security Science and Technology Center of Excellence. Led by Northeastern University, SENTRY combines the strengths of three emeritus Centers of Excellence. SENTRY envisions the Virtual Sentry Framework as a real-time decision support system enabling actionable situational awareness leading to more effective threat assessment, preparedness, mitigation, and response for soft targets and crowded places.

I have also worked on pre-award and post-award sides for the Center for Research on Early Childhood Exposure and Development (CRECE), Environmental influences on Child Health Outcomes (ECHO), NSF Engineering PLUS and many other big awards.

Over the years, we still have many of the same team members and have had a wonderful opportunity to see the University grow. Professor Silevitch was the first professor to win an ERC at Northeastern and Professor Akram Alshawabkeh was the first engineering professor to win a NIEHS P42 award. I think much more research has been able to come to the University because of these awards. It is a great honor to work with this amazing group.

Could you briefly describe your typical day-to-day on the job?

That depends, I may have an agenda for the day, but things always seem to pop up to change my plan. Faculty and staff come to me when they need assistance with various tasks. It could be preparing a budget for a proposal, handling a post award transaction, or many other administrative tasks that may come up and need immediate attention. My days are quite busy multi-tasking on numerous tasks, but I love working on all my projects, so I just rearrange my day to get the work done.

What is something you are proud of, and in what ways do you believe your work tends to go unnoticed by the broader Campus/NU-RES Community?

I feel that my work gets noticed as I am constantly receiving 'thank you's' for the work I do. It is a great working relationship and that is why I am still here. When you really enjoy working with an amazing group of people, you feel a sense of camaraderie. We have all been in this together for so long and we are an awesome team.

I am incredibly proud of my team and working with them is a great honor. In CenSSIS and PROTECT we are a family, and they will not let you leave. We have excellent working relationships with everyone on the projects. You must make it a community when working on big multi-disciplinary, multi-institutional research awards. We work so inclusively within the entire research community that you would not even know which member belongs to which University.

I pride myself in assisting PIs with preparing grant proposals and budgets and working on the post-award side of the awards. They just need to ask me for help, and I always say, "Sure, I can help!" It is about realizing their vision and wanting to help them achieve their goals. That is how I got my position at Gordon-CENSSIS; I was asked to help with their first NSF Site Visit back in 2001 and then I got hired for the Accounting Manager position. I really was not looking for a new position at the time, but I saw an amazing group and wanted to be part of the team.

Before the University started growing, I could park my car in the Hayden parking lot which is now the library. Back then, Northeastern was considered a commuter school, and now it is a Tier 1 and Global institution. I love the growth I have seen over the years and the opportunities it has given to so many people. Northeastern has hired many people over the past years to extend our faculty and administrative capacity. I am constantly amazed at the growth and positive change in our processes.

What does it mean to you to be working at/with NU-RES? How would you describe the overall impact that individual NU-RES entities like yours have brought to the University?

I work with numerous people in NU-RES to make everything come together whether it is pre-award, post award, subaward or compliance teams. I feel we have a great relationship; we are all in this together and work for the same team! I always extend invitations to NU-RES when we have on campus events so that they can get a better understanding of the Center's missions.

Thirty-plus years ago, we could not offer as much administrative assistance to PIs as we can today. I even remember when OSP now NU-RES was paper driven and encompassed only five employees.

What are hobbies you like to do outside of work?

I have lived in New Hampshire for the past 25 years, now living on the Contoocook River and nearby the mountains and lakes. I enjoy kayaking and stand-up paddle boarding during the summer months, skiing during the winter months, hiking, biking, and playing board games with my family and friends. My two new favorite board games are Skyjo and Splendor. Recently, I have taken up wake surfing on the lake but need a lot more lessons to master the sport. It is especially important to have a work-life balance and I always try to fit some activity into my day.

If there is someone that you know and would like to nominate for this column, please reach out to ResearchCompliance@northeastern.edu.

A SENTENCE HANDED DOWN: *The end of the Charles Lieber case, and the start of a new law.*

By Morgan Fielding

With contributions from: Amanda Humphrey and Tessa Seales.

In November 2018 the U.S. Department of Justice launched an effort, known as the China Initiative, to combat economic espionage perpetrated by the Chinese government. Many Asian faculty were targeted through this effort and many of the resulting prosecutions fell through, but one that hits close to home is that of Charles Lieber. At the time of his prosecution, Lieber was a professor and chair of Harvard's chemistry department.

Lieber was arrested on Harvard's campus in 2020 and charged with making false statements to authorities regarding his relationship with the Wuhan University of Technology (WUT) including a contract from a related Thousand Talents Program. Talent programs have come under suspicion because while they appear to be an effort to bring the best talent to China, many have criticized the terms of these awards, including requirements to conceal the arrangement. Lieber had a three-year talent award, under which he agreed to establish a research lab at WUT, publish articles, organize international conferences, and apply for patents on the school's behalf. WUT agreed to pay him up to \$50,000 a month as a salary and to provide living expenses of up to \$150,000. A portion of his salary was deposited in a Chinese bank account and the rest was paid in \$100 bills delivered in a brown paper bag. Lieber denied his involvement during questioning from U.S. authorities, including the National Institutes of Health, as well as concealed this income on his U.S. tax returns.

Lieber was ultimately convicted on six counts including filing false tax returns, making false statements, and failing to file a report for a foreign bank account in China. Full details of his sentencing are available online. While Lieber and several other researchers were convicted under the China Initiative, other cases have been dismissed, including all charges against MIT professor Gang Chen who allegedly concealed Chinese affiliations when applying to the U.S. Department of Energy for grants. Controversy over the program pushed the DOJ to end the China Initiative in February 2022 with officials citing perceptions that it unfairly painted Chinese Americans and U.S. residents of Chinese origin as disloyal. On the same day the China Initiative ended, the DOJ announced a new strategy: Countering Nation-State Threats, under which the inherent objectives remain.

In the wake of the China Initiative, new laws are forcing change starting in August 2022 when President Biden signed the CHIPS and Science Act. One aspect of the new law prohibits researchers working on federal agency-funded programs from participating in 'malign foreign talent recruitment' programs. The CHIPS Act defines 'malign foreign talent recruitment programs' as any program, position, or activity that includes compensation directly provided by a foreign country, inability to terminate a contract, requirements to conceal and not disclose relations with the program to federal agencies, engage in the unauthorized transfer of intellectual property including data and materials, and/or the establishment of a lab or appointment in a foreign country that violates the terms of an ongoing federal research award (the full definition can be found here). Scientists and their collab-

orators will have to disclose their participation in such programs in their research proposal which generally recruit scientists by giving 'gifts' directly to faculty when compared to legitimate research grants and contracts that go through the university. Faculty and their IP can be better protected when offers received from an external source are vetted by the university before any agreement is signed.

While most researchers try to do the right thing, sometimes it can be difficult to navigate voluminous sponsor rules, policies and regulations. Northeastern faculty and staff are encouraged to reach out to the Research Compliance department in NU-RES as a resource. Additionally, Responsible Conduct of Research (RCR) sessions, open to all, cover topics re: disclosures, financial conflict of interest, conflict of time commitment, grant stewardship, and research misconduct.



Research Mentorship: A Shared Community Dialogue

On Wednesday, September 13th, research faculty, graduate students, and postdoctoral fellows are invited to join us at John D. O'Bryant African American Institute / [Cabral Center](#) (and online via Teams). This session will fulfill the new NSF training requirements for faculty and students by providing an open panel discussion about promising practices related to mentorship and a community-wide opportunity to share learnings and experiences that will enable us all to reflect on the importance of strong, ethical mentorship in stewarding the research community throughout the Northeastern global campus network.

Attendees will gain valuable perspective on the importance of mentorship for both mentors and mentees, as well as gain a greater understanding of the critical role of mentorship in facilitating safe and inclusive work environments and fostering research integrity. To register to attend in person, [click here](#) and to register to attend online, [click here](#).

INTERNATIONAL SHIPPING: KNOW BEFORE YOU SHIP!

By Lissette Gilster

Every year the Bureau of Industry and Security (BIS) releases an updated version of “Don’t Let this Happen to You,” which provides real-life case studies of penalties linked to export compliance violations. Many of these export violations are linked to international shipping, some are egregious acts in which the offenders were trying to evade federal export regulations, but there are also some examples of entities that inadvertently violated these regulations. There are many items that require an export license, or shipment may be prohibited based on the foreign destination. Those unintentional violations linked to shipping could have easily been avoided if an export compliance review had been conducted. One of those examples is the Princeton University case:

The Violation: During an investigation, the Office of export Enforcement found that on 37 occasions between 2013 and 2018, Princeton University engaged in conduct prohibited by the Export Administration Regulation (EAR) when it exported various strains and recombinants of an animal pathogen classified under ECCN 1C351, 1C352, or 1C353, controlled for Chemical and Biological Weapons reasons, from the United States to various overseas research institutions. These research institutions were located in Belgium, United Kingdom, Singapore, Canada, France, Israel, Japan, Denmark, Switzerland, Australia, Hungary, Portugal, South Korea, India, and China. Many of these shipments would have been permissible if the shipper had sought the required export licenses prior to completing the shipments.

However, such shipments are difficult for universities to catch for two reasons: first, not all biologicals (as well as materials, equipment, and devices) are subject to the same controls. Export requirements are based on the specifications of the item and its intended shipping destination.

Second and more importantly, many universities including Northeastern University have decentralized shipping, in which each department, college, lab or university personnel have their own FedEx or UPS accounts for shipping. This decentralized approach can make it difficult for personnel to ensure compliance with U.S. export control laws, leading to violations of the export control laws, which may result in substantial individual and institutional civil and criminal penalties.

The Penalty: On February 1, 2021, Princeton University agreed to pay a \$54,000 civil penalty. The University was also ordered to complete an internal audit of its export controls compliance program and an external audit conducted by an unaffiliated third-party consultant.

One of the mitigating factors that Princeton had in their favor was that they did a voluntary self-disclosure to BIS and cooperated fully with the investigation. It's important to note this because BIS administrative penalties can go up to \$300,000 per violation or twice the value of the transaction, whichever is greater.

What we Have Learned: Currently at NU, international shipping reviews take place through processes developed with other departments, such as OARS and NU-RES, as well as creating awareness through training for faculty and staff. However, these are just short-term solutions, we are looking at more powerful and consistent ways to protect our faculty and staff by investing in a centralized shipping solution, which would provide visibility for ALL international shipments at NU. The shipping platform we are exploring as a long-term solution is eShipGlobal, which is a global shipping compliance software used by over 900 academic institutions across the U.S. This shipping platform provides the ability to house all major shipping carriers in one system (FedEx, UPS, DHL), as well as automate compliance checks for both export controls, as well as environmental health and safety.

While we are working on this long term solution shipping platform, if you are planning an international shipment or if you have any questions on international shipping, please contact the Export Compliance Office exportcontrol@northeastern.edu

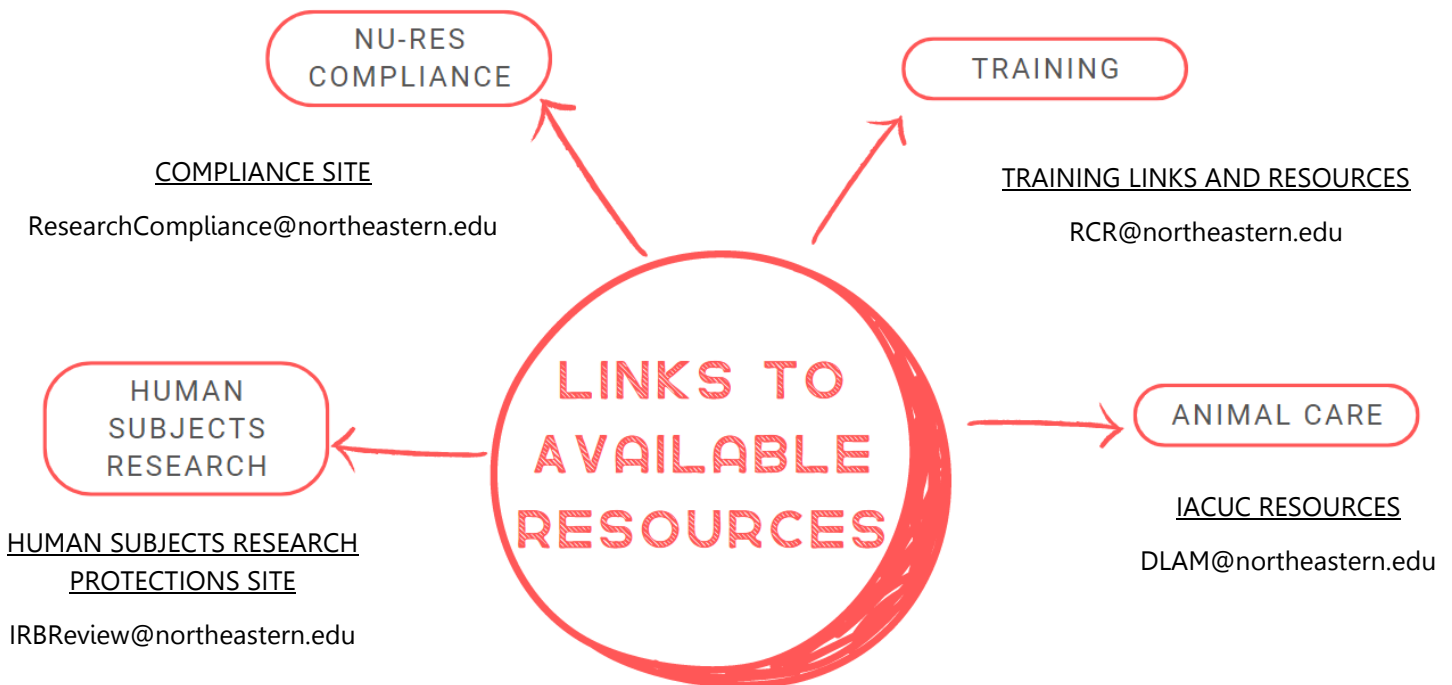
NU-RES SUMMER 2023 WORKSHOP RECAP

By Morgan Fielding



On Monday, June 12th, NU-RES successfully hosted an all-day workshop bringing together over 100 members of the Northeastern research community both in-person and virtually. Throughout the day, six sessions were led by subject matter experts from a variety of different offices including the Ombuds Offices, OUEC, DE&I, HRPP, DLAM, OARS, and others on a range of topics. This shorter, more niche workshop created an opportunity for attendees to learn about different areas that intersect with research beyond research administration fundamentals. Additionally, the workshop was designed to present new or upcoming internal and external changes and updates that are occurring or will be required.

While grants management is the core role for many attendees, it is important to take a holistic approach to frame and appreciate the entire life-cycle of research at Northeastern. The workshop aimed to highlight the essential role of research administrators as part of the success of research within Northeastern. Finally, as an added surprise we held raffle drawings with six winners in total for both in-person and remote attendees, each winning an e-gift card to a local business of their choice. We came away from this workshop with learned experiences, strengthened relationships, identified opportunities for improvements, and renewed energy on working together to reduce administrative burden and work towards the president's ambitious research funding goals. Following this success, we hope to host a 2-day, in-person conference in **June 2024** on the Boston campus. Stay tuned for updates, as well as a future survey to solicit topics and ideas for conference sessions.



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