June 30, 2023

National Science Foundation
2415 Eisenhower Ave.
Alexandria, VA 22314

Re: Dear Colleague Letter: A Request for Input on the Development of the U.S. Research Security and Integrity Information Sharing Analysis Organization (NSF 23-098)
Submitted electronically to RSI-ISAO@nsf.gov.

The Association of American Medical Colleges (AAMC) appreciates the opportunity to provide feedback to the National Science Foundation (NSF) on the development of a Research Security and Integrity Information Sharing Analysis Organization (RSI-ISAO), as mandated by Section 10338(b) of the CHIPS and Science Act of 2022 (Public law 117-167).

The AAMC is a nonprofit association dedicated to improving the health of people everywhere through medical education, health care, medical research, and community collaborations. Its members are all 157 U.S. medical schools accredited by the Liaison Committee on Medical Education; 13 accredited Canadian medical schools; approximately 400 teaching hospitals and health systems, including Department of Veterans Affairs medical centers; and more than 70 academic societies. Through these institutions and organizations, the AAMC leads and serves America's medical schools and teaching hospitals and the millions of individuals across academic medicine, including more than 193,000 full-time faculty members, 96,000 medical students, 153,000 resident physicians, and 60,000 graduate students and postdoctoral researchers in the biomedical sciences. Following a 2022 merger, the Alliance of Academic Health Centers and the Alliance of Academic Health Centers International broadened the AAMC's U.S. membership and expanded its reach to international academic health centers.

In previous comments to the White House Office of Science and Technology Policy,[1] AAMC has strongly supported the creation and development of an RSI-ISAO (also known as the Risk Assessment Center, or RAC) which is intended to empower the research community to address foreign interference issues and connect institutions to federal officials. This key resource for the academic community could assist all institutions in successfully building out programs and processes to address research security. The effectiveness of the RAC will be dependent on creating an organization which is informed by the needs of the community it serves, engenders trust in its helpful and consultative mission, and provides resources that allow the community to implement research security requirements with confidence and consistency across institutions. We are pleased to provide input on the specific topics as requested by NSF, incorporating feedback received from AAMC member institutions through direct outreach and in a listening session conducted with NSF to provide the agency with additional feedback beyond the suggestions discussed here on the six thematic areas for which NSF has requested input.

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[1] AAMC Comments in Response to Request for Information; NSPM-33 Research Security Programs Standard Requirement (88 FR 14187). June 2, 2023. Available at: https://www.aamc.org/media/68116/download.

Current Research Security and Integrity Issues
Institutions are working to implement a wide variety of research security and integrity processes and procedures, which impact and involve multiple parts of the organization including sponsored programs, compliance, legal, conflicts of interest, grants management, technology transfer, international and travel offices, information technology, export control, and research integrity. The distributed nature of these programs and processes can pose challenges for addressing research security questions and requirements in a coordinated manner, not only nationally, but also within a single institution.

Informational Resources
To fulfill its function to effectively impact decision-making, management, and risk mitigation at the institutional level, the RAC should ensure that its information is timely, actionable, and consistent, and also takes into account research security policies from across the federal government. Providing institutions with a library of risk matrices, relevant research, templates for research collaboration agreements, in addition to providing analysis in response to specific queries, would help improve an institution's ability to make necessary decisions that often require prompt attention.

Prioritization of the RSI-ISAO's Duties
We understand that the capabilities of the RAC will be developed through a phased approach. We recommend Below we provide three recommendations we consider as key duties for the initial work of the RAC:
1. Develop a standard set of frameworks and best practices, relevant to the biomedical research community, to assess research security risks in different contexts.
2. Provide timely reports on research security risks to increase situational awareness tailored to the research and STEM education community.
3. Provide training and support, including through webinars and virtual forums, for relevant faculty and staff employed by institutions of higher education on topics relevant to research security risks and response.

Integration of RSI-ISAO Resources into Institutional Decision-Making Processes and Benefits Based on Position
For the RAC to be immediately useful to an institution, the channels that it uses to communicate information should be easily findable and accessible, and also targeted to different roles within the institution when necessary. For example, faculty members would benefit from a different set of resources than would research administrators and compliance officers. Whenever possible, it would be helpful to organize the resources of the RAC in accordance with federal policies and regulations—for example, establishing an online repository of weblinks and information that would assist institutions in building a research security program. It would also be helpful for the RAC to collate risks and response strategies, for duties (1) and (2) above.

Liaison Role
Providing institutions with a forum to share experiences and best practices would be extremely useful. We recommend that the RAC partner with higher education organizations since many already have previously established educational communities and forums that are dedicated to discussing research security issues. The AAMC welcomes the opportunity to assist the NSF with this endeavor, including by connecting the agency with our constituent groups and member institutions that have developed expertise in this area. We also understand from conversations with institutions that it is

currently challenging to reach federal representatives for time sensitive questions about research security, and we hope that the RAC could facilitate these connections.

Additional Feedback

A common theme in we heard in discussions with AAMC member institutions about the RAC was the desire that the RAC focus on how to preserve and protect international scientific collaboration whenever possible, within the context of research security principles and requirements laid out by the government. The RAC should serve to ensure institutions have the best possible evidence on research security risks in order to identify problematic scenarios, facilitate promising research opportunities, and make decisions about projects, travel, and personnel. The hope is that with readily applicable guidance and more information, institutions will not feel obligated to turn down or end beneficial research programs or collaborations with international partners simply because the best way forward is not crystal clear. The RAC can best fulfill its mission and its mandate by first helping institutions to draw clear boundaries where they exist as a result of federal law or policy and then facilitating principled and productive partnerships to advance science globally.

We again appreciate the opportunity to provide feedback on this important center and look forward to working with NSF as the development of the RAC moves forward. Please feel free to contact me or my colleagues Anurupa Dev, PhD, Director, Science Policy and Strategy (adev@aamc.org) and Heather Pierce, JD, MPH, Senior Director for Science Policy and Regulatory Counsel (hpierce@aamc.org) with any questions about these comments.

Sincerely,

Ross McKinney, MD
Chief Scientific Officer

cc: David J. Skorton, MD, AAMC President and Chief Executive Officer