

April 13, 2023

Stacy Murphy
Deputy Chief Operations Officer/Security Officer
Office of Science and Technology Policy
Executive Office of the President
1650 Pennsylvania Ave., NW
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researchsecurity@ostp.eop.gov

Re: Request for Listening Sessions on Research Security Programs Standards

Dear Ms. Murphy:

On behalf of our organizations representing the higher education and research community, thank you for your work to develop and release the draft NSPM-33 research security programs standard requirements. We especially appreciate the significant length of the comment period which we believe will produce well-informed, thoughtful responses. We write to recommend that OSTP conduct listening sessions with stakeholders, as soon as feasible, to engage specific officials within the academic research community who have expertise on key areas outlined in the draft NSPM-33 research security programs standard requirements¹. This would be consistent with previous listening sessions OSTP has conducted on research security issues, and listening sessions would provide an opportunity to raise suggestions and concerns at a deeper level than the five-page written response limit with permit.

Our member institutions take seriously the threats posed by malign foreign actors and the obligation of U.S. institutions of higher education, as defined in NSPM-33, to properly mitigate risks to federally funded research. As such, we have a shared interest in developing clear research security program standards that are effective in helping to protect and secure the research we conduct on behalf of the federal government.

The proposed guidance has raised several questions and concerns we believe warrant further opportunity to engage with OSTP and key research agencies to ensure that complete feedback can be provided on the proposal. To strengthen and expedite the development of the final research security program standard requirements, we encourage OSTP to hold listening sessions that aim to engage with cybersecurity officials, export control officers, and research security officers from a cross-section of academic institutions with varying research portfolios. We believe that holding such sessions will help OSTP develop robust and effective final research security program standard requirements in a timely manner and ensure their effectiveness across the spectrum of academic research institutions.

¹ <https://www.federalregister.gov/documents/2023/03/07/2023-04660/request-for-information-nspm-33-research-security-programs-standard-requirement>

Thank you for your work to develop and produce the draft research security programs standard requirements as part of the implementation of NSPM-33. We look forward to continuing to work with you to ensure consistency and transparency in the implementation of NSPM-33.

Sincerely,

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