



October 15, 2025

The Honorable Roger Wicker
Chairman
Committee on Armed Services
United States Senate
Washington, D.C. 20510

The Honorable Mike Rogers
Chairman
Committee on Armed Services
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Jack Reed
Ranking Member
Committee on Armed Services
United States Senate
Washington, D.C. 20510

The Honorable Adam Smith
Ranking Member
Committee on Armed Services
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Wicker, Ranking Member Reed, Chairman Rogers, and Ranking Member Smith,

As the House and Senate reconcile their respective versions of the National Defense Authorization Act (NDAA), we write as presidents of the Association of American Universities and Association of Public and Land-grant Universities, to express concern with a provision we strongly believe would set back the nation's research enterprise and represents a marked departure from the committees' strong record of addressing research security concerns in a balanced manner. As such, we respectfully request that the SAFE Research Act be struck from any final measure.

Under your leadership, the House and Senate Armed Services Committees (HASC and SASC) have an unmatched track record of thoughtful, bipartisan cooperation in furtherance of American science, innovation, and research security. Beginning with the FY20 National Defense Authorization Act, HASC and SASC carefully considered and enacted policies to preserve and protect the American research enterprise from any entity that might attempt to harm or exploit it. This included the Securing American Science and Technology Act (SASTA) to improve federal coordination on matters of science and security, which ultimately led to the existing interagency policies that have actively addressed threats to federally-funded research from malign foreign influence.

In every enacted NDAA since then, the committees you lead have continuously deliberated these matters and passed provisions to further improve the research security regime of the United States. The demonstrated bipartisan collaboration between your committees – in partnership with other committees of jurisdiction, to include House Science and Senate Commerce – marshalled in comprehensive standards, definitions, risk assessments, trainings, common disclosure forms, certification requirements, as well as information-sharing practices between the intelligence and university communities. It not only resulted in the establishment of effective mitigation procedures to alleviate risk but also ushered in a renewed culture of vigilance and discernment across universities and the entire research enterprise.

With gratitude, we credit HASC and SASC's leadership on this complex and consequential set of issues. With concern, however, we note that the House-passed version of the FY26 NDAA includes a measure that was neither thoughtfully considered nor advanced on a bipartisan basis. In fact, it was not marked up or carefully debated at all. The [SAFE Research Act](#), however well-intentioned, does not align with the demonstrated track record of success of the armed services committees in partnership with the science committees, nor does it recognize the great strides your committees have made on matters of research security. Troublingly, the SAFE Research Act undermines and actually conflicts with the past definitions and policies you [worked to codify](#).

Recommendation: We urge you to strike Title XVII, Subtitle D, Sec. 1736 – Sec. 1740, the “SAFE Research Act” and reject it from the final conference agreement.

The SAFE Research Act would have far-ranging impacts affecting **all research agencies**, not just the Department of Defense. It would create such enormously broad definitions of “hostile foreign entity” and “affiliation” that would apply to **any** agreement that a U.S. university has with **any** university in China or other defined countries at the time of application or in the **five years prior** to application. This would include collaborative work with any individual faculty member or former student who subsequently returned to China as a required condition of their U.S. visa. It would capture every single research agreement, every study abroad program, every language program, every professional conference, and every campus facility that a U.S. university might have in partnership with another institution abroad. In effect, it will functionally require any U.S. institution of higher education and their faculty to terminate all engagements with numerous international universities and researchers as a condition of federal funding, regardless of whether these programs and collaborations are currently even active or inactive. To be clear, while we are well aware of the need to prohibit certain types of collaborations to ensure our national security, Americans do benefit from many other important international research collaborations in areas such as global health and fundamental knowledge creation – including those with China – more than they do by completely severing all scientific and academic ties with talented researchers.

The current prohibitions, trainings, risk reviews, and safeguards [mandated by previously enacted legislation](#) are working. They were carefully crafted to balance the risks of what could be lost against all that the United States stands to gain through scientific cooperation. The SAFE Research Act does not acknowledge, align with, or incorporate the existing disclosures required of both individuals and institutions. Instead, it imposes a brand-new construct, creating a duplicative, and in many instances conflicting, set of requirements that will place additional burdens not only on universities, research labs, and institutions, but also on federal science agencies.

Not only would these new requirements be difficult for the agencies to interpret and enforce, but they come at a time when these agencies are already experiencing significant reductions in force, to include many of the very agency staff with direct responsibility for effectuating research security policy. The mandated certifications, including a five-year lookback and retroactive penalties, would be virtually impossible to implement. The fragmented waiver process, with no centralized standard or harmonized policy, will create confusion once operationalized. Beyond the unquestionable chilling effect this will have, it is unclear how the compulsory vast data collection, to include gifts of any dollar amount, conference participation, teaching mentorships, and personal travel, would be used. The breadth of disclosures required by the SAFE Research Act go well beyond what is required by current funding disclosures and biosketch submissions as required by [Sec. 223 of the FY21 NDAA](#) (Public Law 116-283).

Beyond virtues of science diplomacy and soft power, DOD-supported fundamental research collaborations further America's own competitive advantage. Implementation of Section 1286 of the FY19 NDAA (Public Law 115-232) requires the Department of Defense to [annually publish a list](#) identifying foreign institutions confirmed as engaging in problematic activity including foreign talent recruitment programs. The 1286 list supplements a [decision matrix](#) the Department maintains to assist program managers in reviewing fundamental research proposals for conflicts of interest, delineating when further actions might be recommended or required. This project-by-project risk analysis provides the Department with strategic flexibility and wide discretion in its decision-making to not only mitigate risk, but to also mitigate potential technological surprise by competitor nations. Such collaborations shed light on the critical technology areas where other nations – including China – are already leapfrogging the United States. Terminating partnerships does not just shortchange our partners or strategic competitors, it foists a blindfold on the United States just as we are increasingly outpaced in the global innovation race. Political energy would be much better spent ensuring that American research institutions do not [lose ground](#) to those competitors.

The underlying premise of the SAFE Research Act is at odds with the nature of fundamental scientific research and the concept of co-publication in scholarly journals. The SAFE Research Act would effectively bar co-authored scientific papers with certain international partners and retroactively punish scientists and engineers with co-publications in the last five years. This action will have a chilling effect on the advancement of science around the world as progress is often achieved through iteration on openly published papers and research results. Appropriately crediting previous work with co-authorship for actions such as the use of datasets, models, or results in a literature review is a bedrock of scientific integrity. As the Department of Defense has itself pointed out in its recent guidance¹, “attempts to constrain the open research environment are likely to be counterproductive to the DoD mission in that the benefits derived from participation in the open research environment by DoD-funded researchers ... greatly outweigh any security benefit achieved by placing controls on fundamental research.”

Moreover, the SAFE Research Act would redefine the terms established by previously enacted defense authorization bills, the CHIPS and Science Act, and National Security Presidential Memorandum-33 ([NSPM-33](#)), a policy issued by President Trump during his first term. It entirely disregards the policies shepherded under your jurisdiction and those of other key House and Senate committees, as well as the effective, harmonized standards [uniquely tailored](#) to the U.S. science and technology enterprise.

We urge you to reject upending the recently enacted laws and processes that are working. Instead, we ask that you continue to support the effective implementation of policies including those called for by prior NDAA legislation, NSPM-33, and the CHIPS and Science Act. We also ask that you support the necessary investments to ensure adequate resources and agency staffing to operationalize such guidance across the interagency.

As negotiations continue toward a final NDAA conference agreement, we thank you for considering our views. We look forward to continued engagement to achieve our shared goals of a robust and secure research enterprise.

¹ Department of Defense, Fundamental Research Guidance, Updated August 4, 2025, <https://basicresearch.defense.gov/Portals/61/Documents/Research%20Security/Fundamental%20Research%20Guidance.pdf>

Sincerely,

A handwritten signature in blue ink that reads "Barbara R. Snyder". The signature is fluid and cursive, with the first name being the most prominent.

Barbara R. Snyder
President, AAU

A handwritten signature in black ink that reads "Waded Cruzado". The signature is cursive and somewhat stylized, with the last name being the most prominent.

Waded Cruzado
President, APLU