

PROCEDURE FOR REQUESTING AUTHORIZATION TO CONDUCT RESTRICTED RESEARCH

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Procedure Introduction

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Responsibilities

POSITION or OFFICE	RESPONSIBILITIES
Office of Culture, Ethics and Compliance https://ooc.usc.edu (213) 740-8258	<ol style="list-style-type: none"> 1. Owner of policy 2. Responsible for oversight of international collaborations and export control compliance programs
Office of Research https://research.usc.edu (213) 740-6709	<ol style="list-style-type: none"> 1. Vice President of Research chairs the International Collaborations and Export Controls Committee 2. Department of Contracts and Grants identifies restricted research proposals/agreements
Office of the Vice President for Strategic and Global Initiatives https://global.usc.edu (213) 740-2852	<ol style="list-style-type: none"> 1. Responsible for oversight of international collaboration and affiliations and student travel abroad.

Procedure Details

Action #	Responsible Stakeholder	Details
1.0	Principal Investigator ("PI")	The PI submits a request for exception to the Vice President of Research when a research sponsor demands the right to approve publication of research outcomes (beyond limited reviews for inadvertent inclusion of proprietary data) and/or restricts access to research on the basis of nationality.
2.0	Principal Investigator ("PI")	Timing for submitting request: <ul style="list-style-type: none"> • When publication and/or personnel limitations are set forth in a proposal solicitation, exceptions must be requested in advance of proposal submission, providing sufficient time for the review process in advance of the proposal deadline. • When limitations are not known until the time of award negotiation, exceptions must be requested and reviewed prior to award execution, allowing sufficient time for the review process.
3.0	Principal Investigator ("PI")	The request for exception must include the following elements:

		<ul style="list-style-type: none"> • Rationale for why the research should take place at USC; • Steps that will be taken to ensure that USC will comply with applicable personnel and/or publication restrictions; • Steps to ensure that students participating in the project, if any, will retain their rights to openly publish their own work; and • Assurance that all project personnel (including faculty, staff, and students) have or will agree in writing to the conditions of the award.
4.0	Vice President of Research and International Collaborations and Export Controls Committee; Principal Investigator (“PI”)	<p>A decision on the proposed exception is made by the Vice President of Research upon recommendation of a standing committee of faculty from a broad range of disciplines, except as specified in Action # 5.0. If research does not qualify as Fundamental Research, complying with Export Control regulations may involve:</p> <ul style="list-style-type: none"> • Limiting foreign national access to all or part of the research; and/or • Obtaining a license from the Departments of Commerce and/or State, as applicable, before disclosing export-controlled technology, technical data, or software source code to a foreign national in the United States (a Deemed Export), or before sending controlled items or information to a foreign country. Under university policy, additional measures designed to ensure compliance with Export Control Regulations may include: • Limitations on where the research can take place at USC; • Implementation of a TCP to protect potentially export-controlled items or information; and • Adhering to publication and personnel restrictions and the requirements of any university-imposed TCP (if applicable).
5.0	Vice President of Research or his/her Vice President of Research and International Collaborations and Export Controls Committee; Principal Investigator (“PI”) designee; Principal Investigator (“PI”)	<p>The Vice President of Research, or his/her designee, is authorized to grant an expedited approval without committee review when both of the following conditions apply:</p> <ul style="list-style-type: none"> • Work will be conducted in its entirety at either the Institute for Creative Technologies (“ICT”) or the Information Sciences Institute (“ISI”) and be subject to a TCP to ensure compliance with applicable restrictions; and

		<ul style="list-style-type: none"> The PI has notified the Vice President of Research about the intent to include students in the project. Upon award of funding, the Office of Research and the Office of Culture, Ethics and Compliance will engage with the Graduate School to ensure that each student is made fully aware of, and agrees to, possible restrictions on publications resulting from the work on the project, and (ii) at the time the student consents to taking on restricted research (under stated publication restrictions), a plan for academic oversight is formulated that protects and outlines the student's pathway to degree completion and publications. The consent needs to be in place prior to the time the student starts work on the project. <p>The Vice President of Research and/or standing committee may require that additional conditions be met, including but not limited to obtaining required licenses from the Departments of Commerce and/or State, as applicable, and implementation of a TCP to protect export-controlled items or information.</p> <p>In the event that an expedited exception is denied by the Vice President of Research or their designee, the Principal Investigator will be given the opportunity for full committee review, at his or her request.</p>
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Definitions

Term	Definition
	See policy for definitions.

Compliance

See policy for all applicable monitoring, exceptions, enforcement, or sanctions for non-compliance.

Relevant Forms and Tools

Proposal Exception Request Application to Request Approval for Conducting Restricted Research:
<https://ooc.usc.edu/international-activity/exception-request-to-conduct-restricted-research/>

Contacts

Please direct any questions regarding this procedure to:

OFFICE	PHONE	EMAIL
Office of Culture, Ethics and Compliance	(213) 740-8258	compliance@usc.edu

