

# Research Ethics & Compliance - Updates

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**RAC Forum**  
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# Disclosure Updates

- New Phoebe Certification
- New NASA Disclosure Rules
- New U.S. Export Control Regulations on Advanced Technologies



# Phoebe: New Certification

## Malign Foreign Talent Recruitment Program (MFTRP)

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### Principal Investigator and Co-Investigator Certification

The text of the certification provided on the PI and Co-PI approval screen is provided here for reference.

- I certify that (1) the information submitted within is accurate and complete; and (2) that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties.
- I certify to the accuracy and completeness of all Other/Current and Pending Support documents contained

**Phoebe:**

## **New malign foreign talent recruitment program (MFTRP)**

***For proposals to federal research agencies, as required by the CHIPS and Science Act of 2022 and UC's Contract and Grant Manual, I certify that I and all UCB Covered Individuals are not part of a malign foreign talent recruitment program (MFTRP), as defined by OSTP, at the time of proposal submission.***

# Grant Notice 24-01 NASA Policy Update (Sept 5th, 2024)

## Policy Summary:

- All senior/key personnel (i.e., PIs, all Co-PIs, and Co-Is spending 10% or more of their time on an award) are required to submit a Biosketch and Current Pending Support (CPS) form with each application
- Senior/ key personnel must certify that information accurate, current, and complete and they are not a party to a Malign Foreign Talent Recruitment Program
- If an entity discovers that a senior/key person failed to disclosure CPS at the application stage or in an annual report, the entity must notify NASA within 30 days of that discovery.

Biosketch and Current and Pending Support forms will be posted on the GPC website soon and will be required starting October 1, 2024.

# New U.S. Export Control Regulations on Advanced Technologies

On September 6, 2024, the U.S. Department of Commerce's Bureau of Industry and Security (BIS) issued interim final regulations that impose controls on advanced and emerging technologies. These regulations target key areas like **quantum computing**, **advanced semiconductors**, and **additive manufacturing**, and are part of broader efforts to regulate exports with a coalition of like-minded countries, as multilateral controls have become more challenging.

## Impact of New Controls on International Collaboration:

Universities collaborating internationally but not engaging in commercial exports may still be impacted by these new controls. The regulations impose global licensing requirements for certain **advanced quantum computing, semiconductor manufacturing, and additive manufacturing technologies**. However, **BIS has facilitated faster adjustments to these controls** through its License Exception IEC, which could accelerate access to key technologies for researchers in compliant countries.

# New Controls

The new BIS regulations introduce **three new ECCNs** related to advanced technologies. These are:

1. **ECCN 2B910** – Controls on advanced semiconductor manufacturing equipment.
2. **ECCN 2D910** – Controls on software for the development, production, or use of advanced semiconductor manufacturing equipment.
3. **ECCN 3A901** – Controls on specific quantum computing technologies.

These new ECCNs reflect BIS's focus on emerging technologies such as quantum computing and advanced semiconductors, which are critical to maintaining national security and technological competitiveness.



# Questions?



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