

UC **SANTA BARBARA** Office of Research



Research Integrity Newsletter - November 2025

News & Announcements

- **Export Control**
- **Responsible Conduct of Research**
- **Human Subjects Research**
- **Animal Subjects Research**

Export Control - The Importance of Accuracy in Every International Shipment

The federal **False Claims Act (FCA)** is the government's primary tool for combating fraud in government programs and contracting. The FCA has become a significant risk for businesses whose federal contracts rely on accurate shipping, customs, or supply chain data.

The False Claims Act imposes liability on any person or company who knowingly submits a false claim for payment to the government. The term "knowingly" includes

having actual knowledge, acting in deliberate ignorance, or acting in reckless disregard of the truth.

Inaccurate shipping information can violate the FCA in several ways including customs and tariff evasion, which is the most common violation, or misstated shipping details to avoid paying the full cost of custom duties or tariffs. Some examples are misclassifying goods, misrepresenting the country of origin, and undervaluing goods.

Any contracts that bill federal agencies directly (such as the Department of Defense) for shipping must be transparent and accurate. Knowingly misrepresenting shipping items can constitute a false claim leading to large settlements and penalties.



Export Control - New NIH Policy on Human Biospecimen Security Measures

On September 24, 2025, **NIH announced** new security measures for human biospecimens obtained from U.S. persons (regardless of identifiability) that are collected, obtained, stored, used, or distributed and that are supported or funded by any on-going or new NIH funding.

Any such biospecimens held by UCSB may not be directly or indirectly distributed to institutions or parties located in **countries of concern**. These countries are subject to change and currently include: China, Cuba, Iran, North Korea, Russia, and Venezuela.

Researchers must contact the campus Export Control Officer prior to shipping biospecimens to any foreign destination. In order to assess whether your shipment is subject to this new restriction, we will need to know whether NIH funds were used in relation to the biospecimens and whether any of the exceptions apply, which are listed in the NIH Notice, which goes into much more detail. Please contact **exportcontrol@research.ucsb.edu** with any questions related to the planned

export of your biospecimens.



Responsible Conduct of Research - NSF Mandates New RCR Training Requirements

The National Science Foundation (NSF) has implemented significant updates to its research security policies, as detailed in [Important Notice No. 149](#), effective October 10, 2025. These changes are designed to safeguard federally funded research and strengthen accountability across NSF-supported projects.

Institutions are required to have a Responsible and Ethical Conduct of Research (RECR) training plan that includes the following new elements:

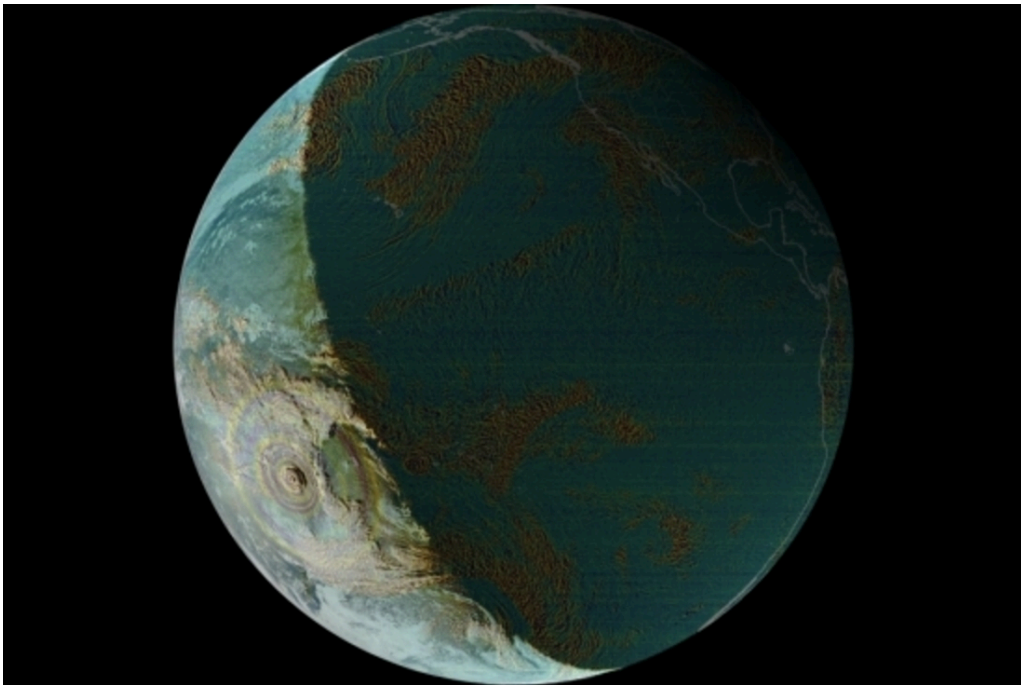
- Training to raise awareness of potential research security threats
- Federal export control, disclosure, and reporting requirements

To meet NSF's updated RECR requirements, UCSB will be leveraging established training resources, including the research security training and export control modules within the campus Learning Center. Many are already required to complete the research security training, and won't need to retake that training to fulfill NSF's new RECR requirement.

We urge all faculty, staff, and students involved in NSF-funded research to remain current with these required training modules to meet both the individual and institutional obligations.

Individuals who need to complete this training will be notified by email. You will only be asked to complete the training modules that have not been taken within the past 5 years. The email will contain specific details on how to access and complete the required training and provide ample time for you to complete the training.

If you have any questions please contact rcr@research.ucsb.edu.



Human Subjects Research - Conducting Research in International Settings

If you plan to conduct research with human participants outside the U.S., your project must follow the same ethical and regulatory standards as domestic studies, as well as the local laws and cultural norms of the host country. Every international project must receive approval from the UCSB Human Subjects Committee and, when possible, from a local Institutional Review Board or Independent Ethics Committee, or even a relevant ministry or government entity, in the host country. If no equivalent local board exists, consider other options, such as consulting with local experts, community leaders, and/or officials and submit documented support/permission along with your protocol application.

Because review requirements can differ from country to country, it's important to plan ahead. The HSC recommends submitting your application **at least one month** before you plan to start your project. If a local IRB isn't available, researchers must still seek some form of **ethical review** from someone who understands the local

context and is not involved in the study. This step helps ensure that your research is respectful, appropriate, and doesn't pose unintended risks to participants.

When preparing your protocol in ORaHs, keep the following points in mind:

- Include details about your international locations, collaborators, and local review process, and certify that all necessary approvals will be provided before research begins.
- Consider differences in language, literacy, culture, and compensation when designing your consent process and interactions with participants.
- If your research involves participants in the European Union, European Economic Area, or mainland China, be aware that additional privacy laws may apply. The EU's General Data Protection Regulation (GDPR) and China's Personal Information Protection Law (PIPL) provide extra safeguards for how personal data are collected, stored, and shared. In most cases, researchers can meet these requirements by including GDPR- or PIPL-compliant language in the informed consent process.

For more information, visit the [DHHS International Compilation of Human Research Standards](#), review the [UCSB SOP on International Research](#), and see the International Research section of the [For Researchers webpage](#).

Human Subjects Research - NIH Flexibilities for Reporting of Prospective Basic Experimental Studies with Human Participants

Per [NIH NOT OD-35-134](#), NIH has indefinitely extended policy flexibilities regarding registration and results reporting per the [NIH Policy on the Dissemination of NIH-Funded Clinical Trial Information](#) for a subset of NIH-funded research whose primary purpose is basic experimental studies with humans (BESH). During the period of delayed enforcement, NIH continues to expect registration and results reporting for these BESH but with the continued flexibility to register and report results on alternative publicly available platforms, although use of ClinicalTrials.gov is encouraged.



Animal Subjects Research - UCOP Policy on the Use of Animals in Research

UCOP recently published the updated **UC Policy on the Use of Animals in Research, Teaching, and Testing**. Notable changes include an expanded section of definitions, including definitions of wildlife and agricultural animals as well as expanded sections of UC obligations and compliance responsibilities.

Upcoming Events

Interested in hosting a human subjects webinar for your department, class, or research team? We can present on a variety of topics from recruitment to informed consent. Contact us at hsc@research.ucsb.edu to schedule a webinar today!

Stay in Touch!

Questions? Contact us at:

Animal Subjects @ iacuc@lifesci.ucsb.edu

Human Subjects @ hsc@research.ucsb.edu

Conflict of Interest @ coi@research.ucsb.edu

Export Control @ exportcontrol@research.ucsb.edu

Stem Cell and Responsible Conduct of Research @ blakemore@research.ucsb.edu

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