

RISK CATEGORIES FOR ELEVATED RISK REVIEWS*



U.S. national security risk	What is the risk that MIT discoveries and inventions created in the engagement will be used against the national security interests of the US? What is the risk that foreign partners will gain access to unrelated MIT knowledge and technology that could be used against US national security interests?
Political, civil, and human rights risk	What is the risk that research outcomes will be used in ways that would infringe on political, civil, or human rights in the foreign country? What is the risk that the engagement will indirectly legitimize actions that are inconsistent with the values of the MIT community?
U.S. economic security risk	What is the risk that the collaboration will strengthen the competitiveness of the foreign entity relative to its U.S. rivals? Will the foreign entity benefit from unpublished know-how that MIT researchers have developed during previous U.S. government-funded research? Will the foreign entity benefit from access to MIT equipment or facilities that were funded by the U.S. government?
Risk to MIT community and core values	Does the engagement pose a risk to MIT's campus culture and values? Is there a risk that it will lead to discrimination or bias against MIT individuals or groups? Does it involve biometric, genetic, or other datasets whose provenance is inconsistent with MIT ethical or informed consent standards? Is there a risk of undue external interference in the direction of research or education?

Export control risk	Will the project be in compliance with all relevant export control laws and regulations?
MIT IP risk	What is the risk that MIT will be unable to retain control of MIT-generated IP and know-how?
Data access/publication risk	Is there a risk that publication will be restricted? Are there restrictions on the use of data that MIT investigators will participate in generating?
Termination risk	Will MIT be able to terminate the engagement if necessary? Are the termination risks acceptable?
Misrepresentation risk	Are the individuals involved who they say they are? Where is the funding coming from and can we trace it to the source?
Reputational risk other than in other risk categories	Are the cooperating entities under investigation by the U.S. government? Are they on USG watch lists? Are individuals/entities involved that are controversial in-country or in the U.S.?
What are the risks of NOT accepting this engagement?	If we do not accept the engagement, what will be the implications for MIT's core academic mission, our competitiveness, the education of our students, the professional goals of our faculty?

* In addition to standard compliance reviews in regular RAS/OSATT review process (e.g., export controls, COI, etc.), travel safety and security, etc.

Process must:

- Be collaborative with the faculty lead(s)
- Provide opportunities for other members of MIT community to participate
- Consider all relevant risks
- Weigh risks against benefits
- Be consistent but also recognize that every engagement is different
- Avoid delay (bandwidth limitations of faculty and staff committees)
- Be comprehensive (many different doorways into MIT)
- Be intelligible – internally and externally
- Avoid unnecessary embarrassment/risk to potential partners
- Be credible to external stakeholders (especially in DC)

Elevated-risk review process

