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Office of Government and Public Affairs

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The Office of Science and Technology Policy Request for Information on the American Research Environment

The comments below are submitted on behalf of the over 3,000 members of the Population Association of America (PAA) (www.populationassociation.org) in response to 84 FR 68958 "Request for Information on the American Research Environment."

Our organizations applaud the Office of Science and Technology Policy (OSTP), through its Joint Committee on the Research Environment (JCORE), in seeking input on a set of important issues pertaining to the current and future vitality, rigor, security, safety and inclusiveness of the nation's research enterprise.

Who We Are

PAA represents more than 3,000 population scientists, an interdisciplinary field that includes demographers, sociologists, economists, and statisticians, who study the implications of population change. Population scientists have made groundbreaking and meaningful contributions on a wide array of topics relevant to society, including the social determinants of health, child and adolescent development, aging, migration, fertility, economic well-being, education, retirement, and post-disaster resiliency.

JCORE has correctly identified several issues that currently or potentially challenge the efficacy and inclusivity of the research environment. We have chosen to respond to two specific areas outlined in the RFI that address aspects of professional interactions and collaborations, namely: strategies to strengthen the security of America's Science and Technology research enterprise; and the imperative to foster safe, inclusive and equitable research environments.

Strengthen the Security of America's Science and Technology Research Enterprise

JCORE's focus on the security of America's research enterprise is both timely and appropriate, given the potential national security consequences of, for example, unauthorized technology transfers of sensitive technologies. Social scientists who engage in international collaborations generally operate in different contexts, however. We would like to offer that perspective to inform the Committee's work as it considers potential

policy recommendations affecting international work across the broad spectrum of scientific investigation.

On the issue of research security, the RFI observes, “The open and internationally collaborative nature of the U.S. science and technology research enterprise underpins America's innovation, science and technology leadership, economic competitiveness, and national security (68959).” The RFI expresses concern at external attempts by “some nations” to exploit and influence our research activities and environments through “talent recruitment programs”, unapproved “shadow labs”, and conflicting financial interests, as well as through other means (68959). Our response focuses first on the context of international research by describing the benefits of international collaborations in social and population sciences. We then consider some of the specific questions posed about risk.

In brief, international collaborations are essential. Access to international scholar networks and access to international data sources are needed to support both domestic and international research programs in the social and population sciences at American universities, and to provide a global education to undergraduates. There are certain risks posed by international projects in the social and population sciences. However, relative to risks in other science and technology areas, these risks are modest. In many cases, they fall within the purview of existing entities that guide research ethics and contracting processes. As protections are implemented with an eye to maintaining security in science and technology fields, it is important to minimize negative spillover effects on fields in which risks are modest and benefits are high.

The case for global collaboration

As in the natural sciences, global collaboration is critical for social and population sciences. First, a global perspective is necessary for understanding many important domestic policy issues in the United States. For example, what are the implications of current and future immigration patterns for educational systems, labor markets, and the social security system? What are the prospects for educational migration to shore up the American higher education system, as it faces declining domestic demand? How might climate shifts create new immigration patterns into the United States? Answers to these questions require significant attention to demographic developments outside of the United States.

Second, global collaboration is important if United States research universities are to maintain a strong capacity to inform the United States government and multilateral agencies and organizations about significant global demographic trends—in fertility, mortality, aging, family, migration, and health—and their policy implications. For example, what emerging health problems are observed in association with a global rise in obesity? What are the implications for education, labor market, and elder support policies of sustained, sub-replacement fertility, and how are countries adapting? What are the implications of ultra-low fertility and rapid population aging for future economic growth and stability in China?

Finally, global collaboration has important spillover effects on the teaching and training missions of American universities. Directly and indirectly, international collaborations support American undergraduate and graduate students' understanding of global issues. These collaborations also support American universities' continued access to the best and brightest students from around the world.

Questions and selected responses

1. How can the U.S. Government work with organizations that perform research to manage and mitigate the risk of misappropriation of taxpayer or other funds through unethical behaviors in the research enterprise? Please consider:

a. Disclosure requirements and policies. Who within the research enterprise should disclose financial as well as nonfinancial support and affiliations (e.g., faculty, senior researchers, postdoctoral researchers, students, visitors)? What information should be disclosed, and to whom? What period of time should the disclosure cover? How should the disclosures be validated especially since they are made voluntarily? What are appropriate consequences for nondisclosure?

b. Disclosure of sources of support for participants in the research enterprise. What additional sources of support should be disclosed, and should they include current or pending participation in foreign government-sponsored talent recruitment programs?

It is reasonable to request that all project investigators disclose on grant proposals their own other support, including current and pending talent recruitment program support, and that other sources of support for the research project itself be made known. However, it is important to acknowledge that reporting may be complicated.

In some science and technology fields, the risks in dollar terms of losing return on investment may be very high. This concern may be less pressing in the majority of social and population science collaborations, in which project goals focus on producing academic or policy-relevant knowledge. Increases in the already-daunting burden of approvals associated with doing international projects will likely exert a dampening effect on willingness to engage in them. In developing safeguards, it is important to consider carefully how to develop reporting requirements that are not exceedingly burdensome, especially in fields where risks are modest.

c. What information can the government provide to organizations that perform research to help them assess risks to research security and integrity?

The government may consider developing a “checklist” of questions to ask prior to setting up international collaborations. This checklist could be based on anticipated issues and issues that have proven problematic in the past.¹

2. How can the U.S. government best partner across the research enterprise to enhance research security? Please consider:

a. Appropriate roles and responsibilities for government agencies, institutions, and individuals;

b. Discovery of and communication of information regarding activities that threaten the security and integrity of the research enterprise; and

c. Establishment and operation of research security programs at organizations that perform research.

In the social sciences, many of the key issues likely to emerge in international collaborations are within the purview of institutional review boards and contract reviewing processes (university institutional review boards and research service offices, working with the Office for Human Research Protections², and the System for Award Management³). Common issues might include, for example, data ownership, security, transfer, and sharing; publication rights; and cultural or national differences in views or standards on ethical conduct of research.

Strengthening capacity to deal with anticipated research security issues so that these entities could provide better guidance, training, and consultation to faculty members would be beneficial. Improved capacity to support international collaborators’ understanding of expectations of US funding agencies and navigation of approvals could help facilitate successful international collaborations.

3. What other practices should organizations that perform research adopt and follow to help protect the security and integrity of the research enterprise? Please consider:

a. Organization measures to protect emerging and potentially critical early-stage research and technology.

b. How can Federal agencies and research institutions measure and balance the benefits and risks associated with international research cooperation?

¹ For an example from the Netherlands for collaborations with China, see Frank Bekkers, Willem Oosterveld, and Paul Verhagen, “Checklist for Collaboration with Chinese Universities and Other Research Institutions,” HCSS Global Trends (The Hague: The Hague Centre for Strategic Studies, nd), <https://www.staff.universiteitleid.nl/binaries/content/assets/ul2staff/onderzoek/checklist-for-collaboration-with-chinese-universities-eng.pdf>.

² U. S. Department of Health and Human Services, “Office for Human Research Protections,” Government, U.S. Department of Health and Human Services, (2020), <https://www.hhs.gov/ohrp/>.

³ U.S. General Services Administration, “System for Award Management,” Government, SAM.Gov, (January 20, 2020), <https://sam.gov/SAM/pages/public/index.jsf>.

The question of how to protect emerging and potentially critical early-stage research and technology is arguably less broadly applicable to social and population sciences than to some of the physical sciences. The question of how to measure and balance the benefits and risks of international research collaboration is highly relevant. In the social sciences, the risks are probably considerably lower than in some of the other sciences and, as noted, fall into the purview of established review processes that could be enhanced to better address the needs of global collaboration, and emerging concerns.

It is important to note that the initiative to tighten security, and the geopolitical tensions that have prompted this initiative, carry the risk of damaging prospects for future collaboration. From one perspective, adding to the already-daunting array of approvals needed to establish international projects may erode motivation of American scholars to engage in serious international collaborations. An equally important factor is that an eroding perception of America as a welcoming place for international scholars from some countries may have a pernicious effect on international scholars' and institutions' willingness to take on the risk of collaborating with American scholars⁴⁵. There would be broad, negative spillover effects of losing international scholars and students on campuses and losing opportunities for students to participate in significant global research collaborations. Social and population science faculty members educate not only future researchers, but also broad swathes of undergraduates interested in all sorts of careers in government, the private sector, and the non-profit sector. These students all stand to lose if there is declining access to global research, ideas, and experiences.

Foster Safe, Inclusive, and Equitable Research Environments

PAA also congratulates the JCORE for prioritizing the need to facilitate safe, inclusive and equitable research environments. PAA share's JCORE's desire to ensure that research environments, including classrooms, laboratories and survey field operations, are adhering to the highest standards of professional conduct.

As an example of our organization's commitment, in 2018, the PAA Board of Directors, working in conjunction with our members, drafted and adopted a formal [anti-harassment policy](#).⁶ The policy outlines expectations for all individuals who attend or participate in PAA meetings, especially the organization's annual meeting. Our goal is to provide "a safe and welcoming conference environment for all participants, free from harassment based on age, race, ethnicity, national origin, religion, language, sexual orientation, gender identity or gender expression, disability, health conditions, socioeconomic status, marital or domestic

⁴ "Hundreds of Chinese Scholars Face US Visa Restrictions," accessed January 20, 2020, <https://www.universityworldnews.com/post.php?story=20190423120547316>.

⁵ "F.B.I. Bars Some China Scholars from Visiting U.S. Over Spying Fears," Newspaper, New York Times, (April 14, 2019), <https://www.nytimes.com/2019/04/14/world/asia/china-academics-fbi-visa-bans.html>.

⁶ PAA Anti-Harassment Policy, adopted October 2018 by the PAA Board of Directors

status, political affiliation or parental status.” Our hope is that our members will use the policy to as a guide when working at their home research institutions. We encourage JCORE to use the PAA policy as a guide for any policies it may wish to promote or highlight for other research organizations and institutions.

Conclusion

In the context of the social and behavioral sciences, human capital is the most important component of the research enterprise. Both of the issues addressed in these comments—*Research Security*, and, *Safe, Inclusive, and Equitable Research Environments*—bear directly on human capital considerations. We believe, therefore, that it is imperative that policies pertaining to the research environment address both 1) the need to ensure that collaborations—both domestic and international—can continue to flourish within any framework of safeguards designed to mitigate potential risk; and 2) the need for standards of conduct and integrity to protect the individuals engaged in research activities—whether as a student, investigator or subject.