COGR

Quick Reference Table of Current & Upcoming Federal Research Security Requirements

Legend:

Requirement Source	Current Requirement or specified compliance date.	Final Requirement in progress	TBD: No information at present as to how requirement will be addressed.

	Biographical & Support Disclosures	Agency Risk Assessment	Financial COI (FCOI) & Conflicts of Commitment (COC)	Training	Certifications	Research Security Program
Sources of Federal-wide Requirements *(Agency specific requirements noted below for each agency.)*	***NSPM-33/ Implementation Guidance and FY 2021 NDAA §223:*** *Sr./key personnel disclosures of research support and activities.* ***Current Status:*** *The* Common Disclosure *forms were published by the NSTC Group on 11/1/23. On 2/14/14, OSTP published* guidance *to agencies for use of the forms. The* **forms include individual certifications for disclosure accuracy and completeness.** *See agency entries for current agency requirements.* **CHIPS Act §10339B** *Institutional foreign financial disclosure report (FFDR) of certain foreign/ gifts contracts to NSF.* ***Current Status:*** *1st report due 7/31/24 with one-time ext. until 9/3/24. Covered in* NSF PAPPG 24-1 *and* FFDR website.	*Addresses how agencies will assess information that is disclosed to them. There is no specific statutory directive for how this assessment must be conducted.* ***Current Status:*** *Departments and/or agencies are developing/have developed risk assessment and mitigation approaches. (See agency entries.).*	***NSPM-33/Implementation Guidance:*** *Policy for disclosure and institutional review of researcher disclosures to identify and address financial conflicts of interest (FCOI) & conflict of commitment (COC)* ***Current Status:*** *Addressed on agency-by-agency basis. See agency entries.* **NOTE:** *With the exception of Dept. of Energy (DOE), agencies address COC via biographical and support disclosures. On 6/18/24, DOE published an* proposed rule *that would require institutions to also have a stand-alone COC policy. Final rule not issued yet.*	***NSPM-33/Implementation Guidance and CHIPS Act §10634:*** *Research security training for sr./key personnel.* ***Current Status:*** *See Research Security Program column. Program standards address research security training and training certification.* *SECURE published condensed training modules that can be used to satisfy trg. requirements. Res. sec. training requirements in effect at DOE & USDA; eff. 10/25 at NSF. NIH added disclosure trg. requirements.*	***FY 2021 NDAA §223:*** *Covered individuals certify disclosures; institution certifies individuals are made aware of obligations.* ***CHIPS Act §10632*** *Covered individual & institution certify no participation in malign foreign talent recruitment program. (*"**MFTP Cert.**"*) Eff. 8/9/24* ***Current Status:*** *See agency entries.* ***CHIPS Act §10634:*** *Individual and institutional certification re. completion of research security training. (*"**Training Cert.**"*) Eff. 8/9/23.* ***Current Status:*** *See Research Security Prog. & Training Columns. Agencies participating in NSTC Group either are, are in the process of, or are expected to use common disclosure forms with individual disclosure & MFTP Certs. See agency entries for current status.*	***NSPM-33/Implementation Guidance:*** *Requires research security program for institutions with ≥ $50M annual "federal science and engineering support." On 7/9/24, OSTP published* Guidelines for Research Security Programs at Covered Institutions. *See COGR* analysis *of requirements. Agencies must submit to OSTP a plan to implement Guidelines within 6 months from 7/9/24.* ***Current Status:*** *Cybersecurity standards and foreign travel security training module are still pending.* ***NEW:*** *NIH is requiring for applications submitted on/after Jan. 25, 2026.*

Agency	Disclosures	Agency Risk Assessment	FCOI & COC	Training	Certifications	Research Sec. Program Cert.
DARPA	●_DARPA adopted 2023 DOD Countering Unwanted Foreign Influence in Dept.-Funded Research at IHEs and associated Decision Matrix to Inform Fundamental Research Proposal Mitigation Decisions_ ("DOD Policy"). This supersedes the prior DARPA CFIP policy, rubric, and _Countering Foreign Influence Program (CFIP) FAQ)_. ● _DARPA uses the Grants.gov Research and Related Senior/Key Person Profile (Expanded) Form and current and pending support and biographical sketch are to be provided as attachments. DARPA uses NSF version of Common Disclosure Forms to provide this information. (See _DARPA Proposer Instructions: Grants/Cooperative Agreements_)._	●_DARPA adopted the 2023 DOD Policy, which includes the DOD Component Decision Matrix._ ●_See DARPA Fundamental Research Risk-Based Security Review Program FAQs._ ●_See DARPA Fundamental Risk-Based Security Review Process description._ ●_See DARPA Fundamental Research Risk-Based Security Reviews Policy and Process presentation_ (Aug. 2024) ●_In May 2025, DOD issued a new 2025 Component Decision Matrix to Inform Fundamental Research Proposal Mitigation Decisions_. **DARPA adopted this matrix.** ●_DARPA June 2025 memo requires risk assessment for all non-FARS research projects._	●_2023 DOD Policy is used for reviewing research proposals for conflicts of interest (COI) and commitment (COC). HOWEVER, the terms COI and COC are not explicitly defined in these documents._ ●_DARPA utilizes 2025 DOD Matrix. Risk-based sec. rev. required for all fundamental research conducted under non-FARS instruments._	●_DARPA may require certain training for specific individuals as part of required risk mitigation._ ●_General research security training is expected to be part of research security program implementation._ ●_No overall res. security training certification required yet._	●_Covered Individuals are prohibited from participating in MFTRPs & participants may not receive DARPA funding. DARPA requires certification of no MFTP participation in Common Disclosure Forms._ ●_2023 DOD Policy decision matrix states that by 8/9/24, institutions must have a policy prohibiting Covered Individuals from participating in MFTRP. 2025 DOD Matrix does not contain this policy requirement, but DARPA Proposer Instructions state that institution must estb. and maintain an internal process or procedure to address MRTRP, COCs, COIs and research integrity._ ●_Training certification and research security program certification TBD._	**TBD**
Army Research Lab	●Disclosure obligations/sources summarized on and in BAA forms site. ●See, also, Army Research Risk Assessment Protection Program (ARRP) FAQs.	●Risk Matrix Rubric ●ARRP FAQs. **●ARL has not yet adopted either 2023 DOD Policy or 2025 DOD Matrix.**	●COC/COI related disclosures and definitions - see, ARRP FAQs.	ARL may require certain training for specific individuals as part of required risk mitigation. ● Research security trg. is expected to be part of res. sec. program.	●Covered individuals are prohibited from participating in MFTRPs. Certification in disclosure forms. ●Training certification and research security program certification TBD.	**TBD**

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DOD	●Refer to specific DOD funding unit announcements for unit-specific requirements. ●*See, generally*, 2019 DOD memo re. protection of IP, controlled info., etc. ● *See,* 2025 Component Decision Matrix to Inform Fundamental Research Proposal Mitigation Decisions ●DOD units expected to use common disclosure forms developed by NSTC Group and some do (e.g., DARPA, NOFO specifications). ●Covered individual participation in MFTRPs is prohibited. Look at component forms to determine if/where certification is included – typically included in disclosure forms. If institution becomes aware of Covered Individual being a participant in MFTRP during project, it must notify DOD within 5 days.	●2023 DOD Policy, including **DOD Component Decision Matrix to Inform Fundamental Research Proposal. Mitigation Decisions has been replaced by 2025** Component Decision Matrix to Inform Fundamental Research Proposal Mitigation Decisions (2025 Matrix). ●2025 Matrix states that it is a guide to assist DoD components in conducting COC & COI reviews; document does not mandate adoption by DOD components.	●Drafting instructions to DOD components re. establishment of COI standards. Will rely heavily on NSPM-33 Implementation Guidance. (See DOD response to GAO) ●Instruction was anticipated 6/1/24 but has not been issued as of 3/19/25. ●No requirement for stand-alone COC policy.	**In progress** DOD is a member of NSTC Group ● Expected to accept the NSF developed research security training modules.	**Disclosures**: See individual component forms for certification of completeness and accuracy.	**MFTP** Consult individual component forms to see if they contain certification of no MFTP participation.	**In progress** DOD is a member of NSTC Group and is expected to provide its plan to OSTP for implementation of research security program standards.
DOE	●FOAs specify use of NSF Common Disclosure Form format for biosketch and current and pending support. See, also, FOA requirements re. disclosures and **Transparency of Foreign Connections,** (e.g. DE-FOA-0002997): ●FAL 2022-04 Current and Pending Support Requirements ●DOE Order 486.1A Foreign Gov. Sponsored or Affiliated Activities ●FAL 2024-05 requires mandatory use of persistent digital identifiers on biosketches and current and pending support documentation by May 2025. ●*See*, generally, website.	●Nov. 26, 2024 DOE memorandum outlines risk assessment process - Research Technology, and Economic Security (RTES) Framework for Financial Assistance & Loan Activities. ●DOE SBIR/STTR Foreign Risk Mgmt. ●DOE Science and Technology Risk Matrix (Nat'l Labs)	●Interim Conflict of Interest Policy, This may be replaced by proposed rule that would require separate, stand-alone COC Policy. But no final rule issued yet. ●Also, refer to specific FOAs.	●See FAL 2025-02 Research Security Training Requirements for all R&D Financial Assistance Awards. **Research security training required for any NOFO application**	●Certification of completion of research security training required for covered individuals for any NOFO application due after 5/1/25. .	●Certification of no participation in MFTRP is required at time of application in Current and Pending Support Disclosure form for FY 25. See DOE webpage. ●DOE Order 486.1A	Covered individuals must complete res. sec. trg. 12 months prior to application and certify completion via C&P Support disclosure cert. May use SECURE consolidates modules or other trg. that applicant

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				due after 5/1/25. Trg. must be completed in 12 months preceding the application. ●Also see background and FAQS. re. research security trg. requirement.		prohibits DOE employees and contractor personnel from participating in FGTRPs.	certifies meets requirements at 42 USC 19234. See Research Sec. Trg. Requirement webpage.
EPA	●NEW: See EPA General Terms and Conditions, Oct. 1, 2024, C&P Support Form, EPA Grantee Forms, ●*See, also*, 4/13/23 memo re. disclosure of foreign research support.	**TBD**	●EPA Final Financial Assistance COI Policy ●No requirement for stand-alone COC policy	**TBD**	**TBD** See HHS OIG Sept. 3, 2024 report noting that EPA lacks certification process for no MFTP participation.		**TBD**
NASA	●NASA issued a Notice of Information Collection, Request for Comments: Biosketch and Current and Pending Support Disclosure Policy, which adopts Common Disclosure Forms with a few modifications as described in notice. *See, also,* NASA Mar. 2025 Grants & Coop. Agreements Terms & Conditions (GCATC), Mar. 2025 Grant & Agreement Manual (GCAM), & Oct. 2024 Pre and Post-Award Disclosure Table	No research-security specific risk assessment matrix. However, Sec. 19 of the GCAM sets forth an award-specific risk assessment process; Sec. 9.4 sets forth restrictions on NASA funding of foreign research proposals; and Appendix A sets forth certifications re. non-collaboration with China.	●COI Policy for Recipients of NASA Financial Assistance Awards ●No requirement for stand-alone COC policy.	**In progress** ●NASA is a member of NSTC Group ●Expected to accept the NSF developed research security training modules.	**Training Cert. In progress** NASA is a member of NSTC Group which has a common approach to certifications.	MFTP Cert. required in current and pending support disclosure form.	**In progress** NASA is a member of NSTC Group and is expected to provide its plan to OSTP for implementation of research security program standards.
NIST	Current and Pending Support webpage and Current and Pending Support Form. NIST uses Common Disclosure Form – requires certification of completeness/accuracy and no MFTP participation.	See NIST Safeguarding Int'l Science: Research Security Framework and Research Security FAQs	●See 5/2025 Financial Assistance Ref. Guide for Recipients &	●NIST FAQs state applicants must provide plan stating how they will address	●NIST uses Common Disclosure Form which includes certification of completeness/accuracy and no MFTP participation.		●NIST FAQS state that NIST does not currently require applicants to demonstrate they

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			[10/2024 Dept. of Commerce Financial Assistance Terms and Conditions](#) ●No requirement for stand-alone COC policy.	research security training. However, they do not mention research security training certification requirement.			have a research security program; however, applicants must provide a written plan describing internal processes for addressing FTRPs, COI, COC, research security training and research integrity. NIST refers to [Safeguarding International Science – Research Security Framework](#) w/re to estb. a research security program.
NIH	●[Biosketch webpage](#) ●[Other Support webpage](#) ●[NIH SBIR and STTR Foreign Disclosure Pre-award and Post-Award Requirements](#) ●[NIH Final Updated Policy Guidance for Subaward Consortium Written Agreement](#) and [webpage](#) ●*See, also*, [Foreign Interference webpage](#) ●On 7/31/24, NIH issued [NOT-OD-24-163](#), NIH's Adoption of Common Forms for Biographical Sketch and Current and Pending (Other) Support	●[NIH Decision Matrix for Assessing Potential Foreign Interference for Covered Individuals or Sr./Key Personnel](#) -includes inappropriate foreign influence risk factors that NIH considers in reviewing applications/awards categorized by factors are prohibited or have required/recommended/suggested mitigation. ●[NIH Decision Matrix – Accompanying Blog Post](#)	●42 CFR Part 50, Subpart F ●No requirement for stand-alone COC policy.	**NEW:** [NOT-OD-25-54](#) – Research security training required for sr/key personnel on applications submitted on or after 1/25/26. ●[NOT-OD-25-133](#), new NIH requirement for	**NEW:** [NOT-OD-25-54](#) – For applications submitted on or after 1/25/26, NIH will require institution to certify that sr/key personnel have completed	●**NEW:** Per [NOT-OD-25-154](#), as of Sept. 11, 2025, persons who are a current party to a MFTRP may not serve as sr/key personnel on NIH grant or cooperative agreement.	**NEW:** Per [NOT-OD-25-154](#), Covered Institutions (i.e., receiving federal science and engineering support >$50M per year) must certify to NIH that institution has and operates a research security program

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	by May 25, 2025, but NIH has delayed this implementation date. Current forms include certification of completeness/accuracy.			trg. sr/key personnel on disclosure requirements.	research security trg. w/in 12 months prior to application submission. ●At time of application, individuals must also certify that they have completed trg. w/in 12 months prior to application. ●NIH is developing central certification system, but initially AOR will certify via signature on face page and individuals will certify via electronically signed certification attached as a flattened PDF per instructions in NOT-OD-25-54.	●**NEW** - **Certifications:** NIH will require the following certifications with its implementation of Common Biosketch and Current and Pending Other Support Form: (i) AOR must certify via signature on face page of application that all sr./key personnel in application have been made aware of any complied with their responsibility to certify they are not in a MFTRP; (ii) Individuals must also certify no MFTRP participation on Biosketch. ●For RPPRs due on or after 1/25/26, sr./key personnel must		including the following elements: (i) cybersecurity; (ii) foreign travel security; (iii) research security training; (iv) export control training as appropriate. **Applications submitted on or after 1/25/26 must meet this requirement.** ●NIH is working with NSF and other federal agencies to develop resources for each element of the res. security program (note – currently there are no final standards for cybersecurity and foreign travel security) ●NIH will issue more info on central certification system as it is developed.

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					●Annual certification will be made at time of RPPR, initially via electronically signed certification submitted as flattened PDF per instructions in NOT-OD-25-54. ●Completing the SECURE Ctr. condensed modules is one way to satisfy trg. requirement.	annually certify no MFTRP participation. ●Certification will initially be done by uploading a certification statement as a flattened PDF per instructions in NOT-OD-25-154.	
NSF	● Common Disclosure forms published 11/1/2023. ●PAPPG 24-1 uses the common forms, which contain individual disclosure cert. ●PAPPG 24-1 addresses institution disclosure to NSF of certain foreign gifts and contracts (**F**oreign **F**inancial **D**isclosure **R**eport "FFDR"). First report due July 31, 2024, with one-time ext. until 9/3/24. See FFDR website. ●Important Notice 149: Proposers and recipients must maintain supporting documents for other	●6/5/24, NSF begins phased implementation of Trusted Research Using Safeguards and Transparency (TRUST) risk assessment/mitigation framework. ● 6/23/24, NSF awards grants for **S**afeguarding the **E**ntire **C**ommunity in the **U**.S. **R**esearch **E**nterprise, or "SECURE") an information sharing and risk assessment type organization for stakeholders. SECURE Center and SECURE Analytics have been established.	●See PAPPG 24-1, Chapt. IX, Part A for COI requirements. ●COC is covered by C&P (Other) Support requirements.	**In progress** ●NSF has published research security training. modules. ● SECURE Ctr. published condensed res. sec. trg. ● Effective 10/1/25, NSF will require research	●MFTP Cert. requirements included in PAPPG 24-1 ●Individual disclosure and MFTP Certifications are in common disclosure forms. ●Eff. 10/10/25 – (a) Sr./key personnel must certify they completed res. sec. trg. w/in 12 months prior to proposal cert.; and (b) IHEs must certify they do not have any agreement with a Confucius Institute.(See Important Notice 149).		**In progress**. NSF is a member of NSTC Group and is expected to provide its plan to OSTP for implementation of research security program standards**.**

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	support and review for compliance NSF requirements.			security trg. certification. ●See, also, Research Security Program Standards column.		
USDA	●Requires use of Common Disclosure form for Biosketch and C&P Support; references OMB control no. 3145-0279 for forms. ●Entity that employs applicants must provide supporting documentation for C&P support. ●*See,* July 2025 America First Memorandum for details on Biosketch and C&P Support requirements.	No specific research security risk assessment; but July 2025 America First Memorandum calls for USDA to review all arrangements/sub-arrangements with any foreign person/entity or US person/entity subject to foreign ownership, control, influence.	Entity that employs applicant must review all Biosketch and C&P Support supporting documentation for compliance with USDA requirements including guidance on COI and COC. [See July 2025 America First Memorandum].	Applicants must certify that they have completed res. sec. trg. not more than one yr. prior to date of application and recertify annually.		