

Quick Reference Table of Current & Upcoming Federal Research Security Requirements

Legend:

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| Requirement Source | Current Requirement | Final Requirement in Progress | TBD: No information at present as to how requirement will be addressed. |
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| | Biographical & Support Disclosures | Agency Risk Assessment | Financial COI (FCOI) & Conflicts of Commitment (COC) | Training | Certifications | Research Security Program |
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| <p>Sources of Federal-wide Requirements</p> <p>(Agency specific requirements noted below for each agency.)</p> | <p>NSPM-33/ Implementation Guidance and FY 2021 NDAA §223: Sr./key personnel disclosures of research support and activities.</p> <p>Current Status: The Common Disclosure forms were published by the NSTC Group on 11/1/23. On 2/14/24, 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.</p> <p>CHIPS Act §10339B Institutional foreign financial disclosure report (FFDR) of certain foreign/ gifts contracts to NSF.</p> <p>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.</p> | <p>Addresses how agencies will assess information that is disclosed to them. There is no specific statutory directive for how this assessment must be conducted.</p> <p>Current Status: Departments and/or agencies are developing risk assessment and mitigation approaches. (See agency entries.).</p> | <p>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)</p> <p>Current Status: Addressed on agency-by-agency basis. See agency entries. NEW 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.</p> | <p>NSPM-33/Implementation Guidance and CHIPS Act §10634: Research security training for sr./key personnel.</p> <p>Current Status: See Research Security Program column. Program standards address research security training and certification.</p> <p>NSF published training modules that can be used to satisfy training requirements. NSF PAPPG 24-1 does not yet require training cert.; cert. requirement anticipated for PAPPG 25-1.</p> | <p>FY 2021 NDAA §223: Covered individuals certify disclosures; institution certifies individuals are made aware of obligations.</p> <p>CHIPS Act §10632 Covered individual & institution certify no participation in malign foreign talent recruitment program. (“MFTP Cert.”) Eff. 8/9/24</p> <p>Current Status: See agency entries.</p> <p>CHIPS Act §10634: Individual and institutional certification re. completion of research security training. (“Training Cert.”) Eff. 8/9/23.</p> <p>Current Status: See Research Security Prog. & Training Columns.</p> <p>NEW NOTE: 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.</p> | <p>NSPM-33/Implementation Guidance: Requires research security program for institutions with \geq \$50M annual “federal science and engineering support.”</p> <p>Current Status: NEW: 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.</p> |

| Agency | Disclosures | Agency Risk Assessment | FCOI & COC | Training | Certifications | Research Security Program |
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| DARPA | <ul style="list-style-type: none"> ●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. DOD Policy does not address disclosures in the same detail as prior CFIP FAQs. | <ul style="list-style-type: none"> ●DARPA adopted the DOD Policy, which includes the DOD Component Decision Matrix. | <ul style="list-style-type: none"> ●DOD Policy is to be used in reviewing research proposals for conflicts of interest (COI) and commitment (COC). HOWEVER, the terms COI and COC are not explicitly defined in these documents. | <p>NEW:</p> <ul style="list-style-type: none"> ●DARPA may require certain training for specific individuals as part of required risk mitigation. <p>●General research security training is expected to be part of research security program implementation.</p> | <p>NEW:</p> <ul style="list-style-type: none"> ●In progress. Post-Aug. 9, 2024, per DOD Policy, Covered Individuals are prohibited from participating in MFTRPs & participants may not receive DARPA funding. NOTE: As of 8/9/24, the DOD Policy decision matrix states that by 8/9/24, institutions must have a policy prohibiting Covered Individuals from participating in MFTRP. Subsequent DARPA communications stated that MFTRP prohibition is required but may be implemented via different mechanisms (e.g., statement) and DOD is anticipated to amend its matrix to reflect this change, but timeline is unknown. <ul style="list-style-type: none"> ●Training certification and research security program certification TBD. | TBD |
| Army Research Lab | <ul style="list-style-type: none"> ●Disclosure obligations/sources summarized on and in BAA forms site. ●See, also, Army Research Risk Assessment Protection Program (ARRP) FAQs. | <ul style="list-style-type: none"> ●Risk Matrix Rubric ●ARRP FAQs. ●ARL has not yet adopted DOD Policy. | <ul style="list-style-type: none"> ●COC/COI related disclosures and definitions - see, ARRP FAQs. | <p>NEW: ARL may require certain training for specific individuals as part of required risk mitigation.</p> | <p>NEW:</p> <ul style="list-style-type: none"> ●TBD <p>NOTE: ARL Risk Matrix Rubric lists covered individual active participation in MFTRP as “high” risk factor.</p> | TBD |

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| | | | | <ul style="list-style-type: none"> General research security training is expected to be part of research security program implementation. | <ul style="list-style-type: none"> Training certification and research security program certification TBD. | | |
| DOD | <ul style="list-style-type: none"> Refer to specific DOD funding unit announcements for unit-specific requirements. See, generally, 2019 DOD memo re. protection of IP, controlled info., etc. and DOD Policy. Expected to use common disclosure forms developed by NSTC Group. NEW NOTE: DOD Policy decision matrix states that after 8/9/24, institution must have policy prohibiting MFTP participation, but see discussion under DARPA Certifications column. | <ul style="list-style-type: none"> DOD Policy, including DOD Component Decision Matrix to Inform Fundamental Research Proposal. Mitigation Decisions. Anticipated to replace other DOD component-specific risk matrices, but no adoption deadline is specified. | <ul style="list-style-type: none"> Drafting instructions to DOD components re. establishment of COI standards. Will rely heavily on NSPM-33 Implementation Guidance. (See DOD response to GAO) NEW: Instruction was anticipated 6/1/24 but has not been issued as of 8/9/24. No requirement for stand-alone COC policy. | <p>In progress</p> <p>DOD is a member of NSTC Group</p> <ul style="list-style-type: none"> Expected to accept the NSF developed research security training modules. | <p>Training Cert. in progress</p> <p>DOD is a member of NSTC group, which has a common approach to certifications.</p> | <p>MFTP Cert. in progress</p> <p>DOD is a member of NSTC group, which has a common approach to certifications.</p> <p>NEW NOTE: See DARPA Certifications column for discussion of DOD “no MFTRP participation policy” requirement.</p> | <p>In progress</p> <p>DOD is a member of NSTC Group and is expected to provide its plan to OSTP for implementation of research security program standards.</p> |
| DOE | <ul style="list-style-type: none"> See funding opp. ann. (FOA), which may contain requirements re. disclosures and Transparency of Foreign Connections, (e.g. DE-FOA-0002997): FAL 2022-04 Current and Pending Support Requirements | <ul style="list-style-type: none"> No overall matrix as of this date, but DOE is developing approaches. See FOAs, which may have provisions that involve risk assessment of foreign collaborations, etc. & website. | <ul style="list-style-type: none"> Interim Conflict of Interest Policy, NEW: This may be replaced by proposed rule that would require separate, stand- | <p>In progress</p> <p>DOE is a member of NSTC Group.</p> <ul style="list-style-type: none"> Expected to accept the NSF developed research | <p>Training Cert. in progress</p> <p>DOE is a member of NSTC Group, which has a</p> | <p>MFTP Cert. in progress</p> <ul style="list-style-type: none"> DOE is a member of NSTC Group, which has a common | <p>In progress</p> <p>DOE is a member of NSTC Group and is expected to provide its plan to OSTP for implementation of research</p> |

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| | <ul style="list-style-type: none"> ● DOE Order 486.1A Foreign Gov. Sponsored or Affiliated Activities ● Expected to use common disclosure developed by NSTC Group. ● NEW: FAL 2024-05 requires mandatory use of persistent digital identifiers on biosketches and current and pending support documentation by May 2025. ● See, generally, website. | <ul style="list-style-type: none"> ● DOE SBIR/STTR Foreign Risk Mgmt. ● DOE Science and Technology Risk Matrix (Nat'l Labs) | <p>alone COC Policy.</p> <ul style="list-style-type: none"> ● Also, refer to specific FOAs. | security training modules. | common approach to certifications. | <p>approach to certifications.</p> <ul style="list-style-type: none"> ● DOE Order 486.1A prohibits DOE employees and contractor personnel from participating in FGTRPs. | security program standards. |
| EPA | <ul style="list-style-type: none"> ● EPA Office of Research & Development Research Terms and Conditions, 5/23 ● See, also, 4/13/23 memo re. disclosure of foreign research support. | TBD | <ul style="list-style-type: none"> ● EPA Final Financial Assistance COI Policy ● No requirement for stand-alone COC policy | TBD | TBD | | TBD |
| NASA | <p>NASA Proposer's Guide, 2/14/23, Sec. 2.15-.16.</p> <p>NEW:</p> <ul style="list-style-type: none"> ● 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. | TBD | <ul style="list-style-type: none"> ● COI Policy for Recipients of NASA Financial Assistance Awards ● No requirement for stand-alone COC policy. | <p>In progress</p> <ul style="list-style-type: none"> ● NASA is a member of NSTC Group ● Expected to accept the NSF developed research security training modules. | <p>Training Cert. In progress</p> <p>NASA is a member of NSTC Group which has a common approach to certifications.</p> | <p>MFTP Cert. in progress</p> <p>Common disclosure forms that NASA will use have MFTP certification.</p> | <p>In progress</p> <p>NASA is a member of NSTC Group and is expected to provide its plan to OSTP for implementation of research security program standards.</p> |
| NIST | Current and Pending Support webpage | TBD | <ul style="list-style-type: none"> ● Financial Assist. Terms & Conditions ● No requirement for stand-alone COC policy. | TBD | TBD | | Safeguarding International Science – Research Security Framework |

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| NIH | <ul style="list-style-type: none"> ● 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 <p>NEW:</p> <ul style="list-style-type: none"> ● 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 by May 25, 2025. NIH plans to adopt the Common Forms without change, but will collect Personal Statement, Contributions to Science, and Honors separate from Common Forms on a NIH Biographical Sketch Supplement. | <p>NEW:</p> <ul style="list-style-type: none"> ● 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 | <ul style="list-style-type: none"> ● 42 CFR Part 50, Subpart F ● No requirement for stand-alone COC policy. | <p>In progress</p> <ul style="list-style-type: none"> ● NIH is a member of NSTC Group ● Expected to accept the NSF developed research security training modules. | <p>Training cert. In progress</p> <p>NIH is a member of NSTC Group, which has a common approach to certifications.</p> | <p>MFTP Cert. in progress</p> <p>Common disclosure forms that NIH will use in May 2025 have MFTP certification.</p> | <p>In progress</p> <p>NIH is a member of NSTC Group and is expected to provide its plan to OSTP for implementation of research security program standards.</p> |
| NSF | <ul style="list-style-type: none"> ● 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 (Foreign Financial Disclosure Report “FFDR”). NEW: First report due July 31, 2024, with one-time ext. until 9/3/24. See FFDR website. | <p>NEW:</p> <ul style="list-style-type: none"> ● 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 Safeguarding the Entire Community in the U.S. Research Enterprise, or “SECURE”) an information sharing and risk assessment type organization for stakeholders. | <p>In progress</p> <ul style="list-style-type: none"> ● NSF has published research security training. modules ● PAPPG 24-1 does not include research security training certification requirement. Anticipated in 2025 PAPPG. ● See, also, Research Security Program Standards column. | | <ul style="list-style-type: none"> ● MFTP Cert. requirements included in PAPPG 24-1 ● Individual disclosure and MFTP Certifications are in common disclosure forms. | <p>In progress.</p> <p>NSF is a member of NSTC Group and is expected to provide its plan to OSTP for implementation of research security program standards.</p> | |