

Quick Reference Table of Current & Upcoming Federal Research Security Requirements

Legend:

Requirement Source	Current Requirement	Final Requirement in Progress	TBD: No information at present as to how requirement will be addressed.
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	Disclosures	Agency Risk Assessment	Financial COI (FCOI)	Training	Certifications	Research Security Program
<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. Current Status: NEW The Common Disclosure forms were published by the NSTC Group on 11/1/23. The forms include individual certifications for disclosure accuracy and completeness. See agency entries for current agency requirements.</p> <p>CHIPS Act §10339B Institutional disclosure of certain foreign/ gifts contracts to NSF. Eff.: 8/9/24 Current Status: Covered in NSF draft PAPPG 24-1. First report anticipated to be due July 2024.</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>NSPM-33/Implementation Guidance: Policy for disclosure and institutional review of researcher disclosures to identify and address financial conflicts of interest (FCOI). Current Status: Addressed on agency-by-agency basis. See agency entries.</p>	<p>NSPM-33/Implementation Guidance and CHIPS Act §10634: Research security training for sr./key personnel. Current Status: See Research Security Program column. Program standards will address research security training and training certification. Training modules are under development by NSF, and NSF advised training certification will not be required until modules are out. Modules anticipated to be complete end of 2023.</p>	<p>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. Column. NOTE: Agencies participating in NSTC Group are expected to use common disclosure forms with individual Training and MFTP Certs. This group is also expected to use SAM.gov for institutional certifications re. disclosures, training, and MFTP.</p>	<p>NSPM-33/Implementation Guidance: Requires research security program for institutions with \geq \$50M annual “federal science and engineering support.” Current Status: Draft Program Standards developed by NSTC Group were published in Fed. Reg. for comment 3/7/23. Comments are undergoing review. NOTE: Agencies in NSTC group are expected to have institutions certify via SAM.gov that all program requirements are met including training requirements and no participation in MFTP.</p>

Agency	Disclosures	Agency Risk Assessment	Financial COI (FCOI)	Training	Certifications		Research Security Program
DARPA	<ul style="list-style-type: none"> ●Disclosure obligations/sources summarized in Countering Foreign Influence Program (CFIP) FAQ 	<ul style="list-style-type: none"> ●CFIP Memorandum and Risk Assessment Rubric. ●See, also, CFIP tab on DARPA website. 	<ul style="list-style-type: none"> ●COC/COI related disclosures and definitions – see Countering Foreign Influence Program (CFIP) FAQ ●Per CFIP FAQ, no current plan to develop FCOI policy. 	TBD	TBD		TBD
Army Research Lab	<ul style="list-style-type: none"> ●Disclosure obligations/sources summarized on ARL BAA website 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. 	<ul style="list-style-type: none"> ●COC/COI related disclosures and definitions - see, ARRP FAQs. 	TBD	TBD		TBD
DOD	<ul style="list-style-type: none"> ●Refer to specific DOD funding unit announcements for specific requirements. ●See, generally, 2019 DOD memo re. protection of IP, controlled info., etc. ●Expected to use common disclosure forms developed by NSTC Group. ●NOTE: After 8/9/24, institution must have policy prohibiting MFTP participation 	<ul style="list-style-type: none"> ●DOD Countering Unwanted Foreign Influence in Dept.-Funded Research at IHEs, including DOD Component Decision Matrix to Inform Fund. Res. Prop. Mitigation Decisions. ●Anticipated to replace other DOD unit risk matrices. 	<ul style="list-style-type: none"> ●Drafting instruction to DOD components re. establishment of COI standards. Will rely heavily on NSPM-33 Implementation Guidance. (See DOD response to GAO.) ●Anticipated 1/31/24 	In progress DOD is a member of NSTC Group <ul style="list-style-type: none"> ● Expected to use the NSF developed research security training modules. 	Training Cert. in progress DOD is a member of NSTC group, which has a common approach to certifications.	MFTP Cert. in progress DOD is a member of NSTC group, which has a common approach to certifications.	In progress DOD is a member of NSTC Group, which has a common approach to research security program standards and is working to finalize those standards.
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 ●DOE Order 486.1A Foreign Gov. Sponsored or Affiliated Activities ●Expected to use common disclosure developed by NSTC Group. ●See, generally, website. 	<ul style="list-style-type: none"> ●No overall matrix. ●See FOAs, which may have provisions that involve risk assessment of foreign collaborations, etc. & website. ●DOE SBIR/STTR Foreign Risk Mgmt. ●DOE Science and Technology Risk Matrix (Nat'l Labs) 	<ul style="list-style-type: none"> ●Interim Conflict of Interest Policy ●Also, refer to specific FOAs. 	In progress DOE is a member of NSTC Group.	Training Cert. in progress DOE is a member of NSTC Group, which has a common approach to certifications.	MFTP Cert. in progress DOE is a member of NSTC Group, which has a common approach to certifications.	In progress DOE is a member of NSTC Group, which has a common approach to research security program standards and is working to finalize those standards.

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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	EPA Final Financial Assistance COI Policy	TBD	TBD	TBD	
NASA	NASA Proposer’s Guide, 2/14/23, Sec. 2.15-.16. <ul style="list-style-type: none"> ● Expected to use common disclosure forms developed by NSTC Group. 	TBD	COI Policy for Recipients of NASA Financial Assistance Awards	In progress NASA is a member of NSTC Group	Training Cert. In progress NASA is a member of NSTC Group which has a common approach to certifications.	MFTP Cert. in progress NASA is a member of NSTC Group which has a common approach to certifications.	In progress NASA is a member of NSTC Group, which has a common approach to research security program standards and is working to finalize those standards.
NIST	Current and Pending Support webpage	TBD	Financial Assist. Terms & Conditions	TBD	TBD	Safeguarding International Science – Research Security Framework	
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 ● Expected to use common disclosure forms developed by NSTC Group 	TBD	42 CFR Part 50, Subpart F	In progress NIH is a member of NSTC Group.	Training cert. In progress NIH is a member of NSTC Group, which has a common approach to certifications.	MFTP Cert. in progress NIH is a member of NSTC Group, which has a common approach to certifications.	In progress NIH is a member of NSTC Group, which has a common approach to research security standard and is working to finalize those standards.

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NSF	<ul style="list-style-type: none"> ● NSF current PAPPG and draft PAPPG 24-1 ● Documents required for Sr. Personnel webpage ● FAQS on Current and Pending (Other) Support ● NSF Policy Office webpage 	<p>In progress</p> <ul style="list-style-type: none"> ● NEW NSF leading NSTC Group development of Common Disclosure forms published 11/1/2023. PAPPG 24-1 updated to use the common forms, which contain individual disclosure cert. ● NSTC Research Security Subcommittee NSPM-33 Implementation Guidance Disclosure Requirements & Standardization ● Draft PAPPG 24-1 addresses institution disclosure to NSF of certain foreign gifts and contracts. First report expected to be due July 2024 	<p>In progress</p> <ul style="list-style-type: none"> ● Research Security & Integrity Information Sharing Analysis Organization (now referred to as Safeguarding the Entire Community in the U.S. Research Enterprise, or “SECURE”) will be a risk assessment type organization for stakeholders. ● Draft PAPPG 24-1 includes the overarching NSF Risk Rubric expected early 2024 	<ul style="list-style-type: none"> ● NSF current PAPPG (includes new definition of “significant financial interest” that includes “venture or other capital financing”). ● Draft PAPPG 24-1 expected to be published early 2024. No changes noted to FCOI provisions. 	<p>In progress</p> <ul style="list-style-type: none"> ● NSF research security training modules in development; expected end of 2023. ● NSF draft PAPPG 24-1 covers training requirement and certification; expected to be published early 2024. ● Training certification not expected until after training modules are published. ● See, also, Research Security Program Standards column. 	<p>In progress</p> <ul style="list-style-type: none"> ● NSF is a member of NSTC Group ● Both Training Cert. and MFTP Cert. are addressed in Draft PAPPG 24-1, expected to be published early 2024. ● Individual disclosure and MFTP Certifications are in common disclosure forms. ● Institutional Certification re. training and MFTP are expected to be processed via SAM.gov. 	<p>In progress</p> <ul style="list-style-type: none"> ● NSF is a member of NSTC Group which has a common approach to research security standards and is working to finalize those standards. ● Draft Program Standards issued in Fed. Reg. for comment 3/7/23. ● Comments are undergoing review. ● Institutions are expected to certify via SAM.gov that all program requirements are met including training requirements.