

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.</p> <p>Current Status: The Common Disclosure forms were published by the NSTC Group on 11/1/23. The forms include individual certifications for disclosure accuracy and completeness.</p> <p>See agency entries for current agency requirements.</p> <p>NEW: OSTP published Policy re. Use of Common Disclosure Forms for Biographical Sketch & Current and Pending (Other) Support Section of Applications by Federal Research Funding Agencies (2/14/24).</p> <p>Requires agencies to adopt Common Disclosure forms unless exception/modifications are expressly approved and provide implementation plan in 90 days.</p> <p>CHIPS Act §10339B Institutional disclosure of certain foreign/ gifts contracts to NSF. Eff.: 8/9/24</p> <p>NEW: Covered in NSF PAPPG 24-1. First report due July 31, 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>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).</p> <p>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.</p> <p>Current Status: See Research Security Program column. Program standards will address research security training and training certification.</p> <p>NEW: NSF has developed and published training modules. NSF PAPPG 24-1 does not yet require certification that training is completed. Certification 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. Not yet implemented by agencies.</p> <p>NEW: OSTP published Guidelines for Federal Research Agencies Re. Foreign Talent Recruitment Programs (Feb. 14, 2024). Requires agency policies prohibiting (a) federal personnel’s participation in FTRPs and (b) Covered Individual’s participation in malign foreign talent recruitment programs (MFRTPs); and (c) certification of no MFRTP. See Research Security Prog. & Training Columns.</p> <p>NOTE: OSTP Guidelines do not include timetable for agency implementation. Agencies are expected to implement common disclosure forms with individual certifications on varying timelines. Also expected to ultimately use SAM.gov for institutional certifications re. disclosures, training, and MFTP.</p>	<p>NSPM-33/Implementation Guidance: Requires research security program for institutions with ≥ \$50M annual “federal science and engineering support.”</p> <p>Current Status: Draft Program Standards developed by NSTC Group were published in Fed. Reg. for comment 3/7/23. Comments under review. No news re. timeline for final standards.</p> <p>NOTE: Agencies in NSTC group are ultimately 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"> ●DARPA adopted 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 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. 	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. ●ARL has not yet adopted DOD Policy. 	<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 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 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 	<p>In progress DOD is a member of NSTC Group</p> <ul style="list-style-type: none"> ● NOTE: Expected to use the NSF developed research security training modules. 	<p>Training Cert. in progress DOD is a member of NSTC group, which has a common approach to certifications.</p>	<p>MFTP Cert. in progress DOD is a member of NSTC group, which has a common approach to certifications.</p>	<p>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.</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 ●DOE Order 486.1A Foreign Gov. Sponsored or Affiliated Activities ●NOTE: 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. 	<p>In progress DOE is a member of NSTC Group.</p>	<p>Training Cert. in progress DOE is a member of NSTC Group, which has a common approach to certifications.</p>	<p>MFTP Cert. in progress DOE is a member of NSTC Group, which has a common approach to certifications.</p>	<p>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.</p>

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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"> ● NOTE: Expected to use common disclosure 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 ● NOTE: Expected to use common disclosure 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.
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. First report due July 31, 2024 	In progress <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. 	In progress <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. ● Institutional Certification re. training and MFTP are to be processed via SAM.gov. 	In progress <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. 		

Agency	Disclosures	Agency Risk Assessment	Financial COI (FCOI)	Training	Certifications	Research Security Program
		<ul style="list-style-type: none"> ●NSF currently developing overarching risk assessment rubric. 				<ul style="list-style-type: none"> ●Draft Program Standards issued in Fed. Reg. for comment 3/7/23. ●Comments are undergoing review. Timeline for final standards unknown.