

# Federal Agency Updates Research Security Implementation

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RAC Forum

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Research Administration and Compliance  
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# Pop quiz!

Which of the following are elements of federal research security?

- A. Current and Pending (aka Other Support)
- B. Biosketch
- C. Cyber & data security
- D. Foreign Travel Security
- E. Export Control
- F. Conflict of Interest
- G. Training certifications

Answer: All of the above!

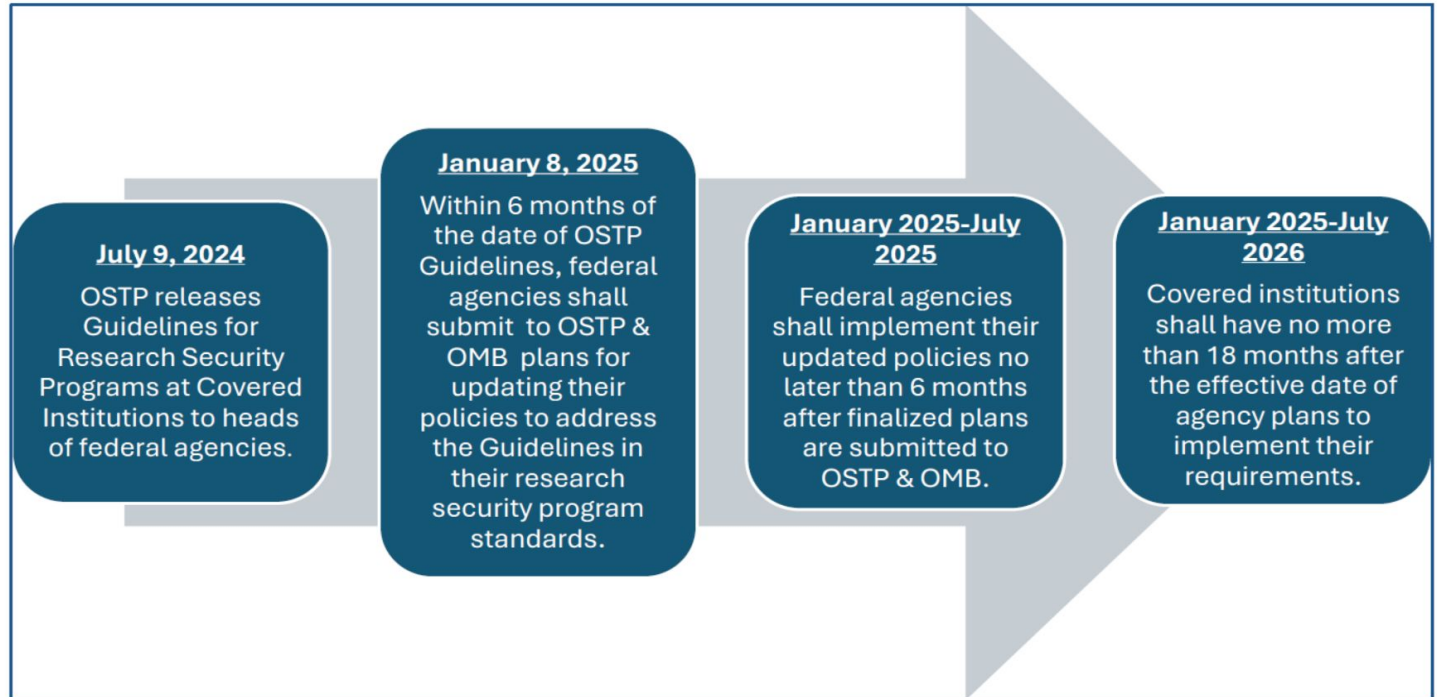
As required by NSPM-33 and the Chips and Science Act, institutions of higher education such as Berkeley will be required to have a research security program which encompasses all of these elements.

# What is research security?

Research Security comprises standardized policies and practices for researchers and research organizations applying for Federal Research and Development (R&D) awards. These measures aim to enhance the protection of U.S. Government-supported R&D against undue foreign government interference and exploitation.

# OSTP Final Guidelines

## Approximate Timeline for Implementation



# Key Areas of Focus in Research Security

- **Disclosure Requirements:** Ensuring transparency in research activities.
- **Cybersecurity:** Protecting sensitive research data.
- **Foreign Travel Security:** Guidelines for international collaborations.
- **Training Programs:** Educating researchers on compliance and security protocols.

# Upcoming Research Security Website

Launch:  
January 2025

Berkeley

## Berkeley Research Administration and Compliance

[About RAC](#) ▾ [ACUC](#) [COI](#) [CPHS](#) [SCRO](#) [SPO](#) [Phoebe](#) ▾ [Export Control](#) [RAC Guidance](#) ▾ [RAC Forum](#)

### Research Security Program

The National Science and Technology Council's [GUIDANCE FOR IMPLEMENTING NATIONAL SECURITY PRESIDENTIAL MEMORANDUM 33](#) (NSPM-33), supported by the [CHIPS and Science Act](#), requires institutions to implement a Research Security Program that includes the following: Cybersecurity, Foreign Travel Security, Research Security Training, and Export Control Training.

An additional component of Berkeley's Research Security Program is research disclosures which includes enhanced controls on and certification of accurate disclosure of international activities in current and pending support and biosketches, as well as restrictions on participation in foreign government talent recruitment programs.

Berkeley's Research Security Program implements the requirements as follows:

Cybersecurity	▾
Foreign Travel Security	▾
Research Security Training	▾
Export Control Training	▾
Research Security Disclosures	▾

# MFTRP Certification

## The CHIPS and Science Act of 2022

- As of August 9, 2024, the Act mandates the prohibition of participation in [Malign Foreign Talent Recruitment Programs](#) (MFTRPs) for "Covered Individuals" under federal research funding.
- "Covered Individual": An individual who contributes in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a research and development award from a federal research agency and is designated as a covered individual by the federal research agency.

# MFTRP Certification

## Phoebe Proposals

- Added [PI/Co-PI certification](#) in the Phoebe proposal record:
  - *For proposals to federal research agencies, as required by the [CHIPS and Science Act of 2022](#) and UC's [Contract and Grant Manual](#), I certify that I and all UCB Covered Individuals are not part of a malign foreign talent recruitment program (MFTRP), [as defined by OSTP](#), at the time of proposal submission.*
- Why add this cert in Phoebe? Certification is required because not all fed agencies have adopted use of the Common Forms (yet!). The new certification in Phoebe proposals ensures that SPO Contract and Grant Officers can certify on behalf of the institution.
- What do PIs need to do? If a proposal does not include use of a Common Form (biosketch or C&P) that capture the individual's certification of non-participation in a MFTRP, a PI would need to ask Berkeley key personnel to confirm they are not a participant in a MFTRP. Not ideal, and hopefully a short term solution that can eventually be removed in 2025 once all fed research agencies require use of Common Forms for C&P and biosketches.



# Research Security Update

## National Science Foundation (NSF)

- Common Forms for Biosketches and Other Support implemented May 20, 2024. NSF requires use of [SciENcv](#) to generate/certify the forms. Guidance [here](#).
- NSF Risk Assessment coming in FY 2025 TRUST
  - [TRUST](#): Trusted Research Using Safeguards and Transparency
  - NSF has designed a research security risk management framework with NSF's core science mission as a guide
  - Will be rolled out by NSF in a phased approach with a pilot focused on quantum-related projects
- Research Security Training - Required for senior/key personnel when the 2025 PAPPG goes into effect (anticipated to be Oct 2025)
  - Must take within one year of an R&D proposal submission

# Research Security Update

## National Institute of Health (NIH)

- NIH Decision Matrix - in effect as of August 15, 2024 and is the NIH implementation of required agency risk assessment and mitigation. Details [here](#).
- Effective May 25, 2025 (new applications and RPPRs)
  - Use of Common Forms for Biosketches and Other Support required and use of [SciENcv](#) required to generate/certify the forms, including certification of non-participation in MFTRPs. See [NOT-OD-24-163](#) for details.
  - All Senior/Key Personnel enter their ORCID ID into SciENcv in the Persistent Identifier (PID) section of the Common Forms.
- Research Security Training - Required for senior/key personnel when the 2025 PAPPG goes into effect (anticipated to be Oct 2025)
  - Must take within one year of an R&D proposal submission

# Research Security Update

## National Aeronautics and Space Administration (NASA)

- Effective Date: Oct 1, 2024 - Revised Grant and Cooperative Agreement Manual (GCAM). Key updates include:
  - Use of Common Forms
    - Submission of Biosketch and Current and Pending (Other) Support must be in common form format and is required for all “Covered Individuals” in proposal submissions for grants or cooperative agreements
    - “Covered Individuals” is defined by NASA as “PIs and Co-PIs (regardless of level of effort), as well as Co-Is proposing effort of 10% or more in any given year on the project”.
  - Applies to awards issued after Oct 1, 2024
  - Helpful Tool: [NASA Pre-award and Post-award Disclosure Requirement](#)
  - NASA Commons Forms template are available on NASA’s [Grant Policy and Compliance Website](#)

# Research Security Update

## Department of Energy (DOE)

DOE issued Financial Assistance Letter [FAL 2025-02](#) on October 7, 2024:

- Effective Date: May 1, 2025
  - Completion of research security training is mandatory for all Covered Individuals (including any new Covered Individuals added to the project) to apply for DOE R&D financial assistance awards.
  - Definition of Covered Individuals may be specific to individual NOFO.

DOE issued Financial Assistance Letter [FAL 2024-05](#) on August 8, 2024:

- Standard DOE biographical sketch and current and pending support forms are currently under development and are expected to be available in 2025.
- Effective Date: May 1, 2025
  - Required Biographical Sketch and Current and/or Pending (Other) Support disclosures must include a digital persistent identifier (PID).

# Research Security Update

## Department of Defense (DOD)

- [Privacy Act Statement](#) - Army Research Lab Broad Agency Announcements (BAAs) require proposers to submit a signed [Privacy Act Statement](#) for each and every senior/key person. Other Defense agencies may follow suit or require other information and/or certifications.
  - Provides an acknowledgement that ARL will be vetting each senior/key person and it is acceptable for PIs and other senior/key person to sign.
  - ARL may have follow-up questions.
- Request for risk mitigation plan is becoming more frequent - please direct any request for risk mitigation plan to SPO ASAP as these requests are time sensitive.
- **Existing disclosure requirement remains (e.g. [March 20, 2019 memo](#))**  
**Proposers should always check specific funding opportunities or BAAs to ensure all required information, format and signatures are included during proposal preparation.**

# Research Security Update

## United States Geological Survey (USGS)

- Pursuant to NSPM-33, USGS now requires the submission of updated biographical sketch and current and pending (other) support in the common disclosure form format prior to issuance of an award.
- As of now, USGS does not require the use of actual common forms but rather formats for submission of all required information, including the certification language as well as signature (not just typed name).
- May start seeing the use of Common Forms requirement in USGS NOFO.

# What's on the horizon? New Training Initiatives

New Training Modules going online (early 2025):

- NSF Consolidated Research Security Training
- UC Mini Modules
  - Export Controls Overview
  - International Shipping
  - Biological Agents
  - Export Control Risks - ITAR
  - Export Control Risks - OFAC
  - International Travel
- ECCR Update (ECAS)

Berkeley

The screenshot shows a web-based training interface. At the top left is the University of California Berkeley logo. The main content area is titled 'Export Control Overview' and features a yellow header with the word 'INCLUSIONS'. Below this header are four columns, each with a representative image and a text box: 'INFORMATION not items' (with a server rack image), 'RESEARCH basic / applied' (with a laboratory flask image), 'ACCREDITED institution' (with a building image), and 'PUBLISHED broadly' (with a blue folder image). A left-hand navigation menu lists various topics under 'Outline' and 'Script' tabs, including 'Introduction', 'Overview', 'Research', 'About', 'Fundamental Research Inclusion...', 'Defense Articles', 'Exclusions', 'Sanctioned countries', 'Risks', 'Export control risks', 'Risks & Considerations', 'Shipping', 'Biological Agents', 'ITAR', 'OFAC', 'Travel Abroad', 'When in doubt', 'Resources', 'Berkeley', and 'Course Test'. At the bottom, there is a video player control bar with a play/pause button, a progress bar, a refresh icon, a speaker icon, and 'PREV' and 'NEXT' navigation buttons. The number '11' is visible in the bottom right corner of the content area.

# What else is on the horizon?

- Update of SPO/RAC websites for NSF, NIH and DOD specific to other support and foreign influence requirements and guidance (next few weeks)
- Berkeley management of certified forms and training certificates (2025)
- Harmonizing among the federal research agencies?
  - Example: Covered Individuals



# Resources

- UCOP Ethics, Compliance and Audit Services webpage on [Foreign Talent Recruitment Programs](#)
- SPO webpage on [Federal Disclosure Related to Sponsored Projects](#)
- SPO webpage on [Other Support and Foreign Influences](#)
- Phoebe Approval Instructions: [PI and Co-PI Certification](#)