

Research Security Updates

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RAC Forum

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Outline

- **Research Security Website**
- **Research Security Training**
- **Malign Foreign Talent Recruitment Program (MFTRP) annual certification**
- **NIH Updates**
- **International Engagements**
- **Related Phoebe Updates**

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Research Security Website

<https://rac.berkeley.edu/research-security/>

Research Security

Growing concerns about research security led to the [National Security Presidential Memorandum-33 \(NSPM-33\)](#), a directive from the President, managed by the [White House Office of Science and Technology Policy \(OSTP\)](#). The [CHIPS and Science Act of 2022](#) strengthens this by adding additional regulations including expanded export control compliance, banning participation in malign foreign talent programs, requiring research security training, and enforcing the reporting of foreign funding.

International collaboration remains vital to the University's research, fostering diverse perspectives, driving large-scale experiments, and addressing global challenges.

What is Research Security?

Research security in a university setting refers to the protection of sensitive research data, intellectual property, and scientific discoveries from theft, interference, or exploitation by unauthorized entities. It involves safeguarding against foreign influence, cyberattacks, and other risks that could compromise the integrity of research or create national and economic security concerns. Key aspects of research security include:

Compliance	Adhering to regulations, such as export control laws and government directives like NSPM-33, that govern international research.
Foreign Influence Management	Preventing unauthorized access to research through foreign collaborations or talent recruitment programs.
Training and Awareness	Educating researchers on how to identify and avoid security risks including transparent disclosures, international travel, cybersecurity and export controls.

RELATED INFORMATION

- [Research Security Program](#)
- [International Engagement – UCOP Enhanced Review and Approval](#)

Research Security Website (Continued)

<https://rac.berkeley.edu/research-security/program.html>

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	▼

Research Security Training*

The thumbnail shows an orange and blue geometric design. Text on the thumbnail includes "Research Security at the University of California", the University of California logo, and a "40m" duration indicator.

ECOURSE

[Research Security at the University of California](#)

The Research Security at the University of California course will take approximately 30-40 minutes to complete. This course fulfills t...

RESEC-BE

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* Other Support Training Newly Added

- **DOE - 5/1/2025**
- **NIH** - NOT-OD-25-154 was rescinded via NOT-OD-25-161 - Other Support Training Still Required
- **NSF - 10/10/2025**
- **Other Agencies pending**

Prohibition of Participation in Malign Foreign Talent Recruitment Programs (MFTRP)

- As of August 9, 2024, the CHIPS and Science Act of 2022 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.
- Questions about MFTRP? researchsecurity@berkeley.edu

Malign Foreign Talent Recruitment Programs Certification Requirements

Agency	Who must provide certification (Covered Individuals)	When is certification required
DOD	Key personnel and, if applicable, others identified by DOD	Proposal stage and annually
NASA	Senior/Key Persons: PI, Co-PI, Co-Is proposing effort of 10% or more in a given year	Proposal stage: certify via biosketch and C&P support. Award stage: annually for the duration of any grant or cooperative agreement award
DOE/NNSA	Covered Individual means an individual who (a) contributes in a substantive, meaningful way to the development or execution of the scope of work of a project funded by DOE or proposed for funding by DOE, and (b) is designated as a covered individual by DOE. At a minimum, PI/PD, Co-PI/Co-PD, project manager, and any other individual functionally performing as any of the above, as well as anyone else identified in a specific NOFO	Proposal stage: certify via form or biosketch and C&P support. Award stage: Certification required from any new Covered Individuals joining the project and when there are any changes to a Covered Individual's MFTRP participation status.
NSF	Covered Individuals: Senior/key personnel include individuals designated by the proposer/recipient organization and who contribute 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.	Proposal stage: Covered Individuals certify via biosketch and C&P support. Award stage: PIs and Co-PIs are annually listed in Research.gov. NSF will implement the MFTRP annual certification requirement for all other senior/key personnel roles at a future date.
NIH	TBD	TBD
USDA	TBD	TBD
USGS	Key personnel	Certification required when USGS requests submission of Common Forms

[Link to full table](#)

DOD and NASA MFTRP annual certification

- **Identification of UCB Covered Individuals for all active DOD and NASA awards**
- **Notify and require annual certification**
- **Mods - SPO will hold amendments if any UCB annual certifications are missing**

NIH Updates

Other Support Training: NOT-OD-25-133

- Effective October 1, 2025, recipients must implement trainings, in addition to maintaining a written and enforced policy, on requirements for the disclosure of other support to ensure compliance for Senior/Key Personnel.
- UCOP will maintain the written and enforced policy.
- Research Security at the University of California eCourse meets the OS training requirement.
- Certification required at the JIT or RPPR phase but not annually thereafter.

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NIH Updates

NIH Research Security Policies:

NOT-OD-25-154 (**Rescinded 9/29/25)

- In alignment with the CHIPS Act, NSPM-33, and OSTP memorandum on Covered Institutions, NIH will require two-part compliance:
- Covered institutions (receiving over \$50M) will certify to the NIH that the institution has established and operates a research security program.
- Covered individuals (i.e. senior/key persons) will certify that they have completed the requisite research security training prior to proposal submission and on an annual basis thereafter.

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NIH Updates

NIH Research Security Policies (contd.)

- *Compliance will be effective for applications submitted on or after January 25, 2026.
- NSF [online research security training \(RST\) modules](#) include a [condensed RST module](#) that is designed to meet the RST requirement.
- [Research Security at the University of California](#) eCourse also meets the RST requirement (preferred).

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International Engagements*

***with countries of concern**

<https://rac.berkeley.edu/research-security/enhanced-review-and-approval.html>

UC International Engagement Enhanced Review & Approval

Agreements, affiliations and collaborations linked to emerging and critical technologies and involving UCOP's list of countries of concern require UCOP's review and approval.

- Phoebe Questions - expanded countries of concern (Saudi Arabia, UAE, Qatar).
- REC process of review - Intake Form
 - General Review
 - Legal Review
 - Export Control Review
 - Disclosure Review
- Berkeley Leadership Review
- UCOP Review (RPAC, ECAS, OGC, President's Executive Office)

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Related Phoebe Updates

- **Phoebe Proposal**
 - Questions
 - Identifying key personnel
- **Certifications**
 - DocuSign MFTRP
 - Phoebe Search (Investigator) uploads

What can you do to help key personnel prepare?

- Ask people in key personnel roles to log into Phoebe to create a Phoebe account (<https://phoebe.rac.berkeley.edu/>).
- Recommend that people identified as Covered Individuals take the Research Security Training now.
- Upload copies of Research Security Training Certificates to Phoebe Search Investigator Records. Include "Research Security Training" and date taken in the description.

What else is on the horizon?

- Phoebe Award Summary (PAS) template updates - annual certs and training requirements
- Subrecipient Commitment Form update
- NIH & DOE use of Common Forms
- SciENCv Common Forms including a cert related to research training
- Harmonizing among the federal research agencies?
 - Example: Covered Individuals
- Research Security Program Certification

Questions?

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Resources

- [UCB Research Security](#)
- [UCB Research Security Program Elements](#)
- [Enhanced Review and Approval](#)
- [Research Security Intake Form](#)
- 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](#) (updates pending)
- Phoebe Approval Instructions: [PI and Co-PI Certification](#) (updates pending)