



# Research Security Policy Update: New Research Security Training Modules

*Presentation for the NSF Research Infrastructure Workshop, Tucson, Arizona*  
*Sarah Stalker-Lehoux*  
*Deputy Chief of Research Security Strategy and Policy*  
*National Science Foundation*  
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# What is Research Security?

***Research security*** –

*Safeguarding the research enterprise against the misappropriation of research and development to the detriment of national or economic security, related violations of research integrity, and foreign government interference.*



# Research Security by All Actors



## Funders

- Collecting appropriate disclosures
- Assessing research proposals for risk
- Working to mitigate risk to “get to yes”



## Research Institutions

- Ensuring disclosures are complete
- Overseeing use of research funding
- Reviewing potential international interactions
- Creating a “research security safety culture”



## Researchers

- Understanding terms of any proposed affiliation or funding source
- Communicating with home institution and funding agency
- Promoting a “research security safety culture” in the lab



# NSPM-33 Implementation Updates

- **Harmonized Disclosure Policy**
  - OSTP – published guidance for USG agencies
  - NSF’s policy – will become effective in 24-1 PAPPG
- **ORCID**
  - *In progress*
- **Research Security Program Standards**
  - *In progress:* DRAFT RSPS Guidance was published in February 2024
- **Oversight and Enforcement**
  - *Forthcoming*

NATIONAL SCIENCE AND TECHNOLOGY COUNCIL



GUIDANCE FOR IMPLEMENTING NATIONAL  
SECURITY PRESIDENTIAL MEMORANDUM 33  
(NSPM-33) ON NATIONAL SECURITY  
STRATEGY FOR UNITED STATES  
GOVERNMENT-SUPPORTED RESEARCH AND  
DEVELOPMENT

*A Report by the*

**Subcommittee on Research Security**

**Joint Committee on the Research Environment**

January 2022



# Chips and Science Act of 2022 Updates

- ✓ **Research security training requirement for all covered personnel on federal awards**
  - Research Security Training Modules have been completed, which satisfy this requirement.
  - The research security training requirement will be part of the 2025 PAPPG.
- ✓ **Prohibition of malign foreign talent recruitment programs for federally funded researchers**
  - Will become effective in the 2024 PAPPG.
- ✓ **Requirement for NSF to establish the SECURE Center**
  - In progress - Award expected in August 2024
- ✓ **Reporting to NSF of foreign financial transactions and gifts above \$50,000 associated with countries of concern**
  - In progress - First reporting requirement on July 31, 2024
- **Prohibition of Confucius Institutes**
  - Will be part of the 2025 PAPPG.



*President Biden sits at a table with the recently signed 'CHIPS and Science Act,' surrounded by legislators and Vice President Kamala Harris.*



# Standardized Disclosure Forms



# Standard Common Disclosure Forms

- The objective of the *Disclosure Requirements and Standardization* section of NSPM-33 Implementation Guidance is to, "**Provide clarity regarding disclosure requirements** (e.g., who discloses what, relevant limitations and exclusions), **disclosure process** (e.g., updates, corrections, certification, and provision of supporting documentation), and **expected degree of cross-agency uniformity**"
- National Science and Technology Council (NSTC) Research Security Subcommittee has worked to develop consistent disclosure requirements for use by senior personnel, as well as to develop proposed common disclosure forms for the Biographical Sketch and Current and Pending (Other) Support sections of an application for Federal research and development (R&D) grants or cooperative agreements
- The National Science Foundation (NSF) has agreed to serve as steward for these common forms as well as for posting and maintenance of the table entitled, *NSPM-33 Implementation Guidance Pre- and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending (Other) Support*



# Drafts of these forms are currently available on NSF website

## Biographical Sketch

### INSTRUCTIONS FOR SUBMISSION OF THE BIOGRAPHICAL SKETCH

This template provides instructions for submission of the biographical sketch by each individual identified as a [senior/key person](#) on a Federally funded research project. The biographical sketch is used to assess how well qualified the individual, team, or organization is to conduct the proposed activities.

Consistent with NSPM-33, individuals are required to disclose contracts associated with participation in programs sponsored by foreign governments, instrumentalities, or entities, including [foreign government-sponsored talent recruitment programs](#). Further, if individuals receive direct or indirect support that is funded by a foreign government-sponsored talent recruitment program, even where the support is provided through an intermediary and does not require membership in the foreign government-sponsored talent recruitment program, that support must be disclosed. Individuals must also report other foreign government sponsored or affiliated activity. In accordance with 42 USC § 19232, individuals are prohibited from being a party in a [malign foreign talent recruitment program](#).

A table entitled, [NSPM-33 Implementation Guidance Pre- and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending \(Other\) Support](#)<sup>1</sup> has been created to provide helpful reference information regarding pre-award and post-award disclosures. The table includes the types of activities to be reported, where such activities must be reported in the application, as well as when updates are required in the application and award lifecycle. A final column identifies activities that are not required to be reported.

Individuals are reminded **not to submit any personal information in the biographical sketch**. This includes items such as: home address; home telephone, fax, or cell phone numbers; home e-mail address; driver's license number; marital status; personal hobbies; and the like. Such personal information is not appropriate for the biographical sketch and is not relevant to the merits of the proposal. The Federal research funding agency is not responsible or in any way liable for the release of such material.

The format of the biographical sketch is as follows:

**\* = required**

#### **\*Identifying Information**

**\*Name:** Enter the name of the senior/key person (Last Name, First Name, and Middle Name, including any applicable suffix).

**Persistent Identifier (PID) of the Senior/Key Person:** Enter the PID of the senior/key person. The PID is a unique, open digital identifier that distinguishes the individual from every other researcher with the same or a similar name.

## Current & Pending Support

### INSTRUCTIONS FOR SUBMISSION OF CURRENT AND PENDING (OTHER) SUPPORT INFORMATION

The individual agrees to update this disclosure at the request of the Federal research funding agency prior to the award of support and at any subsequent time the agency determines appropriate during the term of the award. (Refer to the Federal research funding agency's policy on updating award support).

#### Instructions for Completion of the Current and Pending (Other) Support Template

Current and pending (other) support information is used to assess the capacity or any [conflicts of commitment](#) that may impact the ability of the individual to carry out the research effort as proposed. The information also helps assess any potential scientific and budgetary overlap/duplication with the project being proposed.

This document provides instructions on submission of current and pending (other) support information for each individual identified as a [senior/key person](#) on a Federally funded research project.<sup>1</sup>

A separate submission must be provided for each proposal and active project, as well as in-kind contributions using the instructions and format specified below. Note that there is no page limitation for this section of the application, though some fields have character limitations for consistency and equity.

Consulting activities must be disclosed under the proposals and active projects section of the form when any of the following scenarios apply:

- The consulting activity will require the senior/key person to perform research as part of the consulting activity;
- The consulting activity does not involve performing research, but is related to the senior/key person's research portfolio and may have the ability to impact funding, alter time or effort commitments, or otherwise impact scientific integrity; and
- The consulting entity has provided a contract that requires the senior/key person to conceal or withhold confidential financial or other ties between the senior/key person and the entity, irrespective of the duration of the engagement.

Consistent with NSPM-33, individuals are required to disclose contracts associated with participation in programs sponsored by foreign governments, instrumentalities, or entities, including [foreign government-sponsored talent recruitment programs](#). Further, if individuals receive direct or indirect support that is funded by a foreign government-sponsored talent recruitment program, even where the support is provided through an intermediary and does not require membership in the foreign government-sponsored talent recruitment program, that support must be disclosed. Individuals must also report other foreign government sponsored or affiliated activity. In accordance with 42 USC § 19232, individuals are prohibited from being a party in a [malign foreign talent recruitment program](#).





# Research Security Training Modules



# Research Security Training for the U.S. Research Community

- Co-funded with National Institutes of Health (NIH), Department of Energy (DOE), and Department of Defense (DOD)
- Four teams developed research security training frameworks and training modules
- Available for all appropriate researchers, stakeholders, students, academics, research security experts and leaders, government agencies and national laboratories



# CHIPS+: Research Security Training Modules

**Topic 1: What is Research Security**



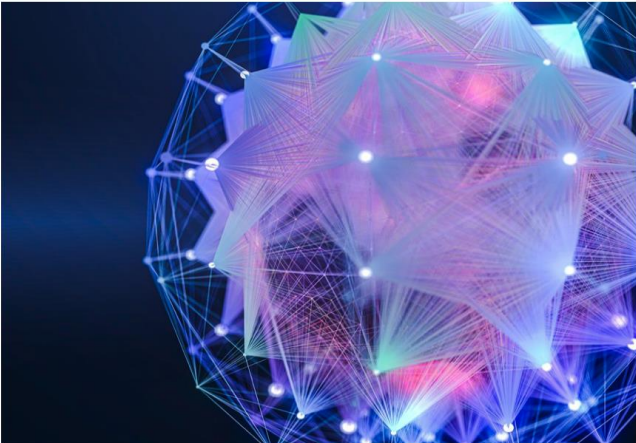
**Topic 2: Disclosure**



**Topic 3: Manage and Mitigate Risk**



**Topic 4: International Collaboration**



# The modules are now available on the NSF website

<https://rst.nsf.gov>

<https://new.nsf.gov/research-security/training>

## Multiple options for accessing modules:

### Take the research security training

Take the training directly from your browser. Visit the four training modules at the links below.

- Each module should take about 60 minutes to complete.
- You can leave a module and return without losing progress from this browser.
- When you complete the module, you can download or print a completion certificate, but the module **will not save a record** of your training.



#### › Module 1: What is Research Security?

Learn key concepts of research security and how to recognize situations that may indicate undue foreign influence. Understand the regulatory landscape that shapes research security and discover what you can do to safeguard the core values that underpin U.S. academic research.

[Start module 1](#)



#### › Module 2: Disclosure

Learn about federal funding agency disclosure requirements, including types of information that must be disclosed, how that information is used, and why such disclosures are fundamental to safeguarding the U.S. research enterprise from foreign government interference and exploitation.

[Start module 2](#)

**Web-based versions that can be taken online**

### Deploy your own instance of the training

If you would like to download these modules for your organization to use, you have two options:

1. **LMS/SCORM:** Download the LMS/SCORM file for use in your organization's learning management system. The files are compiled as SCORM 1.2.
2. **Storyline Source File:** Most of our online lessons are built in Articulate 360. Download the .story file if you would like to edit or modify the lessons in Storyline.

Title	Source files
<b>Module 1:</b> What is Research Security?	1. <a href="#">LMS/SCORM</a> 2. <a href="#">Storyline Source File</a>
<b>Module 2:</b> Disclosure	1. <a href="#">LMS/SCORM</a> 2. <a href="#">Storyline Source File</a>
<b>Module 3:</b> Manage and Mitigate Risk	1. <a href="#">LMS/SCORM</a> 2. <a href="#">Storyline Source File</a>
<b>Module 4:</b> International Collaboration	1. <a href="#">LMS/SCORM</a> 2. <a href="#">Storyline Source File</a>

**IHEs can download for integration into learning management systems**

**Questions? Check out the recently released FAQs!**



# RST Module Frequently Asked Questions

- Available as SCORM files for download and integration into university Content Management Systems
- Designed to be integrated into canon of training through sponsored program offices
- Ability to add localized content
- 30-60 minutes per module, highly interactive and engaging
- Web-based version publicly available via NSF website

Access all the FAQs here: <https://new.nsf.gov/research-security/training>



# Malign Foreign Government Talent Program



# Sec. 10632 of CHIPS and Science Act of 2022: Malign Foreign Talent Programs

- Unauthorized transfer of intellectual property or other nonpublic information;
- Recruit trainees or researchers to enroll in such program;
- Establishing a laboratory/employment/appointment in a foreign country in violation of terms and conditions of a Federal research award;
- Inability to terminate;
- Overcapacity/overlap/duplication;
- Mandatory to obtain research funding from the foreign government's entities;
- Omitting acknowledgement of U.S. home institution/funding agency;
- Not disclosing program participation; or
- Conflict of interest/commitment.  
***\*And also sponsored by a country of concern***



# SECURE

Safeguarding the Entire Community in  
the U.S. Research Ecosystem





# Today's Geopolitical Environment is Challenging for Research



Researchers & Institutions



**SECURE is the bridge**



US Government





## Mission:

Empower the research community to make security-informed decisions about research security concerns



## Approach:

Providing information, developing tools, and providing services



## Audience:

IHEs, non-profit research institutions, and small and medium-sized businesses



# What SECURE will do... and won't do



Uniform Quality of Service



Reduce Cost and Administrative Burden



Frameworks and Best Practices



Advice, Decisions, Investigations, Policy



Curated Syntheses

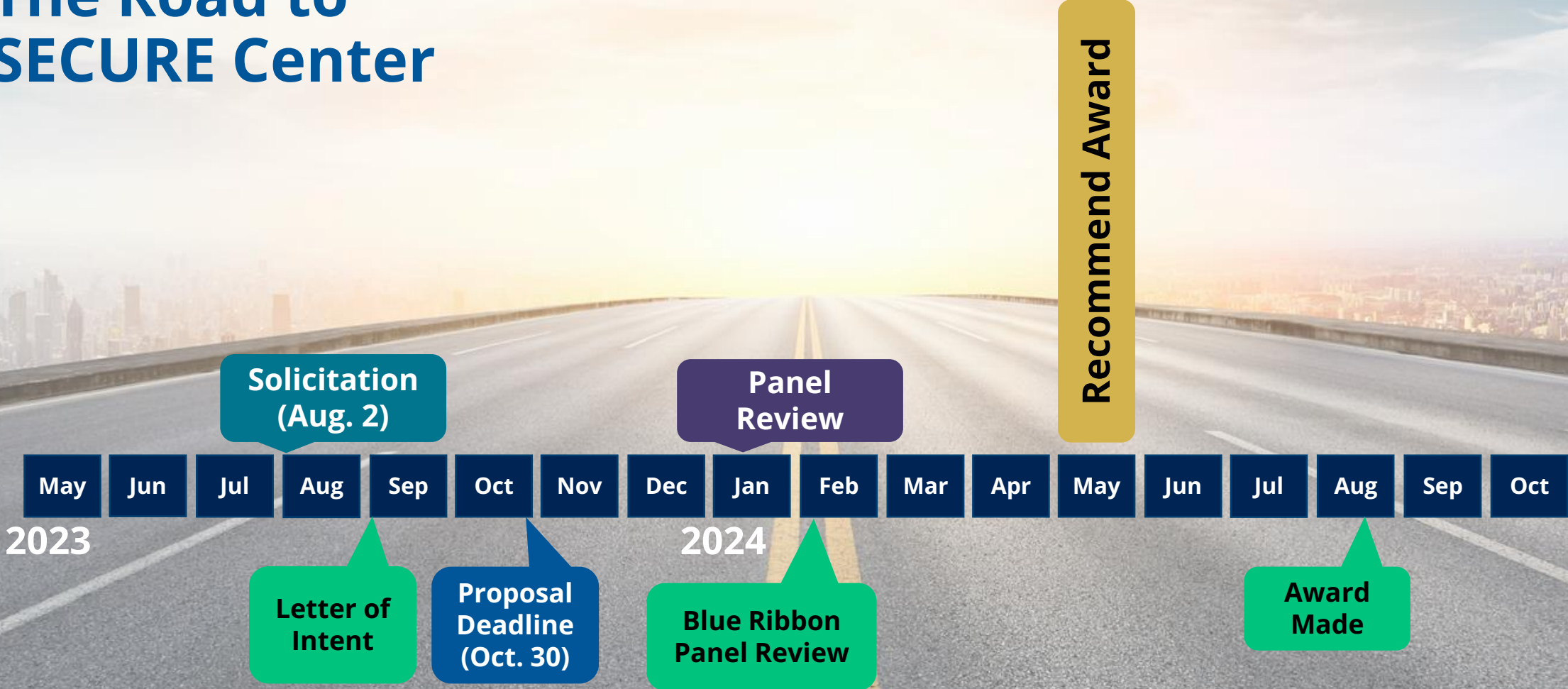


Patterns of Risk



Analytical Tools

# The Road to SECURE Center



# *Forthcoming* NSF Policy and Rubric



# NSF will be able to review NSF proposals for risk: **Mitigation is the goal!**

## **NSF Policy in 24-1 PAPPG**

- In 24-1 PAPPG, NSF policy to review proposals for research security and integrity risks based on a National Security Concern.
- NSF will develop a rubric of risk-based indicators to inform the basis of this decision-making process.
- Working to mitigate risk to “get to yes”

## **NSF Actions to Inform the Development of the Rubric**

- JASON Study on Sensitive Technology
- STPI study
- JASON Winter Study to ‘Road Test’ the draft rubric
- Coordination with NSF Staff
- USG Interagency Consultations
- External Consultations forthcoming



# Foreign Financial Disclosure Reporting Requirement



# Sec. 10999b of CHIPS and Science: Foreign financial transactions and gifts

- Requires NSF “recipient institution of higher education... a foundation of the institution, and related entities such as any educational, cultural, or language entity.... to report all “current financial support, the value of which is \$50,000 or more, including gifts and contracts, received directly or indirectly from a foreign source” which is “associated with a foreign country of concern.

## **Timeline**

- First FFDR submission due to NSF by July 31, 2024
- Reporting period:
  - July 1, 2023, to June 30, 2024

## **Tuition payments**

- Tuition exemption from disclosure requirements from individuals to support a specific student(s)





