Recent NIH and NSF Requirements: Research Security

9/16/25

PRESS RELEASE

Cleveland Clinic to Pay Over $7 Million to Settle Allegations of Undisclosed Foreign Sources of Funding on NIH Grant Applications and Reports

Friday, May 17, 2024

For Immediate Release
U.S. Attorney's Office, Northern District of Ohio

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PRESS RELEASE

University of Maryland, College Park Agrees to Pay $500,000 to Resolve Allegations That It Failed to Disclose Foreign Research Support in Federal Grant Proposals

Tuesday, July 16, 2024

For Immediate Release
U.S. Attorney's Office, District of Maryland

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PRESS RELEASE

Stanford University Agrees to Pay $1.9 Million to Resolve Allegations That it Failed to Disclose Foreign Research Support in Federal Grant Proposals

Monday, October 2, 2023

For Immediate Release
Office of Public Affairs

New Federal Agency Requirements – Research Security

- NOT-OD-25-133: Requirement to Training Senior/Key Personnel on Other Support Disclosure Requirements

- NIH-OD-25-154: Implementation of NIH Research Security Policies

- NSF Important Notice No. 149: Updates to NSF Research Security Policies

NOT-OD-25-133:
Senior/Key Personnel on Other Support Disclosure Requirements

Effective date: **10/1/25**

Institutions receiving NIH funding must:

- Implement training for Senior/Key personnel on requirements for the disclosure of Other Support
- Maintain a written/enforced policy
  - UAB Enterprise Conflicts of Interest and Conflicts of Commitment Policy

NIH-OD-25-154:
Implementation of NIH Research Security Policies

Effective for applications submitted on/after **1/25/26**

NIH requires two-part compliance for *covered* institutions and individuals:

- **Institutions** (receiving >$50M/annually)
  - must certify to NIH that institution has established/operates a research security program.
- **Individuals** (senior/key personnel)
  - Must annually certify they have completed the requisite research security training within 12 months prior to application submission.
  - **Malign Foreign Talent Recruitment Programs (MFTRP)**
    - Individuals participating in MFTRPs are ineligible to serve as senior/key personnel.
    - Annual certification of non-participation is required.
      - occurs via annual disclosure of financial/foreign interests.

NSF Important Notice No. 149:
Updates to NSF Research Security Policies

**Effective date: 10/10/25**

Broad updates regarding research security requiring, in pertinent part:

- **Risk Assessments**
  - Institutions must maintain documentation (e.g., contracts, grants, foreign appointments, talent program participation) related to current and pending support and provide it to NSF upon request.
- **Mandatory Research Security Training**
  - Must annually certify they have completed the requisite research security training within 12 months prior to application submission.
- **Malign Foreign Talent Recruitment Programs (MFTRP)**
  - Individuals participating in MFTRPs are ineligible to serve as senior/key personnel.
  - Annual certification of non-participation is required.
    - occurs via annual disclosure of financial/foreign interests.

What does this mean for research faculty?

- If you will be submitting Other Support documents on/after 10/1/25, as part of Just-in-Time (JIT) or RPPR/progress reports, <u>you must comply with the research security training requirement</u>.

- <u>NIH may request certification</u> from the UAB authorized organizational representative (AOR) <u>regarding compliance during JIT or as part of RPPR progress reporting</u>.

- Log in to the <u>UAB Learning Management System (LMS)</u>
  - Search for "*Research Security Training*" and register for the course.
  - Be sure to maintain documentation of training completion.

research securi

Research Security Training
Done
security training modules which can be found on the NSF website.
E-learning
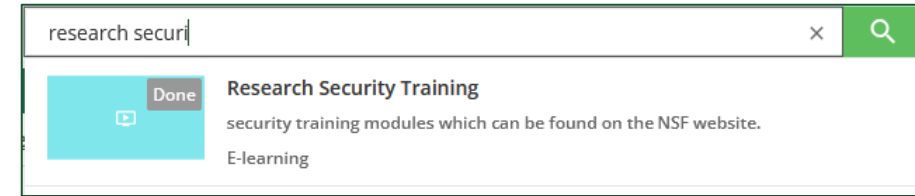
Online Learning

Campus Learning System

Regulatory and unit-level learning for all employees, affiliates and academic students; enterprise-level learning and attestations for UAB Campus employees; and registration for L&D and EACC instructor-led courses.

REQUIRED BROWSER(s): Google Chrome and Firefox work best with the Campus Learning Management System.

Certificate of Completion

This certificate is presented to

Jereme C. Logan

For successfully completing
Research Security Training (Federal Modules 1-4 Condensed and Combined)

Date Completed: 9/15/2025

UAB The University of Alabama at Birmingham.

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Research Matters

September 10, 2025

U.S. National Science Foundation

New NSF Training Requirement

The U.S. National Science Foundation (NSF) issued Important Notice No. 149 outlining its major updates to research security policies in alignment with the CHIPS and Science Act of 2022 and NSPM-33 . These changes impact all NSF-funded proposals and awards. Effective October 10, 2025, all principal investigators and senior/key personnel must complete research security training within the twelve (12) months prior to proposal submission.

All NSF principal investigators and senior/key personnel must complete the research security training module in UAB's Learning Management System (LMS) to obtain credit. Training must be renewed annually.

UAB LMS Course | Learn more...

Research Security Training

E-learning   ENGLISH

[⚑ MARK AS OUTDATED]

> **ⓘ Renewable certification**
> This course is eligible to renew the certification: Annual Research Security Training. The certification expires on: 09/15/2026.

Course description

To assist institutions and Covered Individuals in meeting the CHIPS Act training requirement, NSF, DOE, the National Institutes of Health (NIH), and the Department of Defense (DoD) funded research security training modules which can be found on the NSF website ↗. The modules, developed with the community through cooperative agreements, centered on the following four questions:

- Why is research security an important issue?
- What is a disclosure policy and how will it be used?
- What actions can federally funded research recipients take to manage and mitigate risk?
- Is international collaboration encouraged?

The SECURE Center has condensed the modules into one shorter module (CTM 1.0). The SECURE Center Co-Creation process was used to refine, update and improve existing Research Security Training (RST) modules to better serve and empower the community. CTM 1.0 was designed to meet all of the RST requirements of the CHIPS and Science Act. As per NSF's Important Notice No. 149 ↗, "NSF, NIH, DOE, and DOD all recognize completion of the condensed module as compliant with their respective RST requirements."

What research faculty must do now …

NIH

- If you will be submitting Other Support documents on/after 10/1/25 (as part of JIT or RPPR) - you must take the research security training before submission of the OS page

- If you will be submitting a proposal on/after 1/25/26 – you must take the research security training before submission of the proposal

- Don't forget to save the certificate of completion as a PDF – NIH may ask for it.

NSF

- If you will be submitting a proposal on/after 10/10/25 – you must take the research security training before submission of the proposal

- Don't forget to save the certificate of completion as a PDF – NSF may ask for it.

Additional Information

- CHIPS and Science Act of 2022 (P.L. 117-167)

- Guidance for Implementing National Security Presidential Memorandum-33

- 7/29/24 Office of Science and Technology Policy (OSTP) memorandum on Guidelines for Research Security Programs at Covered Institutions