

## **Dec 2019 — [JASON Report “Fundamental Research Security”](#)**

Commissioned by NSF and the intelligence community, this report provided technical grounding for research security risks and highlighted how open systems could be exploited—serving as a catalyst for later policy action.

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## **Executive & Policy Actions**

### **Jan 14, 2021 — [National Security Presidential Memorandum-33 \(NSPM-33\)](#)**

Issued by the White House, NSPM-33 formally elevated *research security* as a national policy priority and directed federal research funding agencies to strengthen protections against foreign interference and exploitation.

### **Jan 2022 — [Guidance for Implementing NSPM-33](#)**

OSTP/NSTC issued implementation guidance to federal agencies outlining key elements of research security programs: cybersecurity, foreign travel security, research security training, and export control awareness.

### **Aug 25, 2022 — [CHIPS and Science Act of 2022 \(Pub. L. 117-167\)](#)**

This landmark law (signed Aug 2022) codified research security requirements across agencies:

- Mandates research security training for senior/key personnel on federally funded R&D applications.
  - Requires institutions to disclose foreign financial support and conflicts of commitment.
  - Directs OSTP coordination on guidelines and common forms for research security disclosures.
- It ties research security into broader science and innovation investments.
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## **Standardization and Implementation**

### **July 9, 2024 — [OSTP Research Security Program Guidelines](#)**

OSTP issued standardized “Guidelines for Research Security Programs at Covered Institutions” to heads of federal agencies, shaping how NSPM-33 and CHIPS security provisions should be operationalized across agencies.

### **Jan 9, 2025**

Federal agencies were directed to submit implementation plans to OSTP and OMB by this date to update their research security policies in accordance with OSTP guidance.

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## Agency Policy Enforcement

### May 2025 — [DOE Research Security Training Requirement Begins](#)

The Department of Energy began requiring covered personnel to complete research security training as a condition of its financial assistance.

#### — [NIH prohibits foreign subawards](#)

In July, they updated guidance on foreign subawards for active projects, and in September, they outlined a new structure for international collaborations.

### October 1, 2025 — [NIH requires training requirements for Biographical Sketch and Other Support](#)

NIH recipients must provide training to all faculty and researchers identified as Senior/Key Personnel on the requirement to disclose all research activities and affiliations (active and pending) in Other Support.

### Oct 10, 2025 — [NSF issues Research Security requirements](#)

NSF updated policies requiring all principal investigators and senior/key personnel to complete approved research security training within 12 months prior to proposal submission, as required under CHIPS.

### Dec 2, 2025 — NSF Important Notice No. 149 Goes Into Effect

Updated research security policies went into effect at NSF, including mandatory training, expanded documentation and reporting requirements (e.g., foreign affiliations and current and pending support forms), and certification obligations.

### [May 25, 2026 — NIH Research Security training required](#)

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## Risk Reviews of Fundamental Research Proposals

In accordance with NSPM-33, federal agencies have developed the following risk review policy and process documents for fundamental research proposal review:

- Department of War - Countering Unwanted Foreign Influence in Department-Funded Research at Institutions of Higher Education (June 29, 2023)
- DoD Decision Matrix to Inform Fundamental Research Proposal Mitigation (Amended May 5, 2025)
- DoD Foreign institutions identified as engaging in problematic activity (Part 3, Table 1 (Amended June 24, 2025)
- DOE Research, Technology, and Economic Security (RTES) Framework for Financial Assistance and Loan Activities (November 26, 2024)
- NIH Decision Matrix for Assessing Potential Foreign Interference for Covered Individuals or Senior/Key Personnel (August 2024)

- NSF Trusted Research Using Safeguards and Transparency (TRUST) (June 2024)

The NSF-funded SECURE Center has published a [Risk Matrix Reference Guide](#) that integrates the NIH, NSF, DoD and DOE risk assessment information that allows for easy comparison of differences and commonalities across agencies.

## Common Forms Implementation

Throughout 2025 and in early 2026, most agencies are adapting to use of Common Forms for Biographical Sketch and Current and Pending (Other) Support through [SciENCv](#).

Disclosure requirements may vary by funding agency, but the purpose of the ‘Common Forms’ is to standardize disclosure requirements across federal agencies.

### Disclosures required in proposals

Type of activity	Documents requiring information
Professional preparation (e.g., education and training).	<ul style="list-style-type: none"> <li>• Biographical Sketch</li> </ul>
Academic, professional or institutional appointments and positions, whether or not remuneration is received, and whether full-time, part-time or voluntary.	<ul style="list-style-type: none"> <li>• Biographical Sketch</li> </ul>
A list of products that demonstrate the individual's qualifications to carry out the project as proposed.	<ul style="list-style-type: none"> <li>• Biographical Sketch</li> </ul>
Current and pending (other) support: <ol style="list-style-type: none"> <li>All resources made available, or expected to be made available, to an individual in support of the individual's research and development efforts, regardless of               <ol style="list-style-type: none"> <li>whether the source is foreign or domestic;</li> <li>whether the resource is made available through the entity applying for a research and development award or directly to the individual; or</li> <li>whether the resource has monetary value; and</li> </ol> </li> <li>includes in-kind contributions requiring a commitment of time and directly supporting the individual's research and development efforts, such as the provision of office or laboratory space, equipment, supplies, employees or students.</li> </ol>	<ul style="list-style-type: none"> <li>• Current and Pending (Other) Support</li> </ul>
In-kind contributions with an estimated dollar value of \$5,000 or more that support the research activity for use on the project/proposal being proposed.	<ul style="list-style-type: none"> <li>• Facilities, Equipment and Other Resources</li> </ul>
In-kind contributions: <ol style="list-style-type: none"> <li>with an estimated dollar value of \$5,000 or more,</li> </ol>	<ul style="list-style-type: none"> <li>• Current and Pending (Other) Support</li> </ul>

Type of activity	Documents requiring information
ii. not intended for use on the project/proposal being proposed, and iii. have an associated time commitment.	
Current or pending participation in, or applications to, programs sponsored by foreign governments, instrumentalities, or entities, including foreign government sponsored talent recruitment programs.	<ul style="list-style-type: none"> <li>• Biographical Sketch</li> <li>• Current and Pending (Other) Support</li> <li>• Facilities, Equipment and Other Resources</li> </ul> <i>(Appropriate placement in each document may be contract dependent)</i>
Consulting activities under the proposals and active projects section of the form when any of the following scenarios apply: <ol style="list-style-type: none"> <li>1. the consulting activity will require the senior/key person to perform research as part of the consulting activity;</li> <li>2. 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; or</li> <li>3. 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.</li> </ol>	<ul style="list-style-type: none"> <li>• Current and Pending (Other) Support</li> </ul>
Postdoctoral scholars, students or visiting scholars who are supported by an external entity, and whose research activities are intended for use on the project/proposal being proposed.	<ul style="list-style-type: none"> <li>• Facilities, Equipment and Other Resources</li> </ul>
Postdoctoral scholars, students or visiting scholars who are supported by an external entity, whose research activities are not intended for use on the project/proposal being proposed and have an associated time commitment.	<ul style="list-style-type: none"> <li>• Current and Pending (Other) Support</li> </ul>
Travel supported/paid by an external entity to perform research activities with an associated time commitment.	<ul style="list-style-type: none"> <li>• Current and Pending (Other) Support</li> </ul>
Startup company based on non-organization-licensed intellectual property (IP).	<ul style="list-style-type: none"> <li>• Current and Pending (Other) Support</li> </ul>
Startup packages from other than the proposing organization.	<ul style="list-style-type: none"> <li>• Current and Pending (Other) Support</li> </ul>

## Required post-award disclosures

Type of activity	Documents requiring information
<p>Current and pending (other) support:</p> <ol style="list-style-type: none"> <li>a. All resources made available, or expected to be made available, to an individual in support of the individual's research and development efforts, regardless of               <ol style="list-style-type: none"> <li>1. whether the source is foreign or domestic;</li> <li>2. whether the resource is made available through the entity applying for a research and development award or directly to the individual; or</li> <li>3. whether the resource has monetary value; and</li> </ol> </li> <li>b. includes in-kind contributions requiring a commitment of time and directly supporting the individual's research and development efforts, such as the provision of office or laboratory space, equipment, supplies, employees or students.</li> </ol>	<ul style="list-style-type: none"> <li>• Project reports (<i>for new support only</i>)</li> <li>• Post-award information Term &amp; Condition (<i>if undisclosed at the time of application submission</i>)</li> </ul>
<p>In-kind contributions:</p> <ol style="list-style-type: none"> <li>i. with an estimated dollar value of \$5,000 or more,</li> <li>ii. not intended for use on the project/proposal being proposed, and</li> <li>iii. have an associated time commitment.</li> </ol>	<ul style="list-style-type: none"> <li>• Project reports (<i>for new support only</i>)</li> <li>• Post-award information Term &amp; Condition (<i>if undisclosed at the time of application submission</i>)</li> </ul>
<p>Current or pending participation in, or applications to, programs sponsored by foreign governments, instrumentalities or entities, including foreign government-sponsored talent recruitment programs.</p>	<ul style="list-style-type: none"> <li>• Project reports</li> <li>• Post-award information Term &amp; Condition</li> </ul>
<p>Postdoctoral scholars, students or visiting scholars who are supported by an external entity, whose research activities are not intended for use on the project/proposal being proposed and have an associated time commitment.</p>	<ul style="list-style-type: none"> <li>• Project reports (<i>for new support only</i>)</li> <li>• Post-award information Term &amp; Condition (<i>if undisclosed at the time of application submission</i>)</li> </ul>
<p>Travel supported/paid by an external entity to perform research activities with an associated time commitment.</p>	<ul style="list-style-type: none"> <li>• Project reports (<i>for new support only</i>)</li> <li>• Post-award information Term &amp; Condition (<i>if undisclosed at the time</i></li> </ul>

Type of activity	Documents requiring information
	<i>of application submission)</i>
Startup company based on non-organization-licensed IP.	<ul style="list-style-type: none"> <li>• Project reports (<i>for new support only</i>)</li> <li>• Post-award information Term &amp; Condition (<i>if undisclosed at the time of application submission</i>)</li> </ul>
Startup packages from other than the proposing organization.	<ul style="list-style-type: none"> <li>• Project reports (<i>for new support only</i>)</li> <li>• Post-award information Term &amp; Condition (<i>if undisclosed at the time of application submission</i>)</li> </ul>

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#### Activities that do not require disclosure

- Recently completed support or support that has ended.
- Travel supported/paid by an external entity to attend a conference or workshop.
- Teaching commitments.
- Startup company based on organization-licensed IP.
- Organizational startup packages provided to the individual from the proposing organization.
- Honoraria or other given for the purpose of conferring distinction or to symbolize respect, esteem or admiration unrelated to research oversight, supervision or co-authorship.
- Unrestricted gifts<sup>1</sup>.
- Training awards and prizes.
- Mentoring as part of appointment or agreement, or mentor/mentee arrangements that do not involve the individual's research activities.
- Academic year salary or salary provided to the individual by the home organization.
- Core facilities and/or shared equipment that is broadly available.
- Facilities and administrative (F&A) reimbursement provided to the proposing/home organization.

1. If an item or service meets the definition of a gift, it is not reported. A gift includes any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, license, special access, equipment time, samples, research data or other item having monetary value. A gift also includes services as well as gifts of training, transportation, local travel, lodging, meals, research hours, whether provided in-kind, by purchase of a ticket, payment in advance or reimbursement after the expense has occurred. A gift by definition is given without expectation of anything in return.