New Research Security Requirements for Federal Projects

The CHIPS and Science Act requires federal agencies to begin implementing several provisions, including those related to research security. These include establishing policies that require covered individuals to certify they are not part of a "malign foreign talent recruitment program" and mandating research security training for those listed on proposal applications.

At this time, both the Department of Energy (DOE) and National Science Foundation (NSF) have implemented new requirements that are now in effect. We anticipate all other federal agencies will implement similar requirements in the near future.

DEPARTMENT OF ENERGY

Effective May 1, 2025, the Department of Energy (DOE) requires that all covered individuals complete research security training **prior to proposal submission** and annually thereafter.

Who Needs Training?
The DOE defines "covered individuals" as those who contribute substantively to the research, including principal investigators (PIs), project directors (PDs), co-PIs, co-PDs, project managers, and anyone functionally performing these roles. FAU is interpreting this as all senior key personnel.

When to Complete Training?
The training must be completed within one year of application submission. The DOE interprets this as the 12 months immediately preceding the application date.

See DOE's definition of "covered individual" and the research security training requirements for all R&D financial assistance awards located here.

FAU has added the Research Security Training module to our CITI Program training portfolio of courses. Researchers have several training options available through the online CITI Program that will satisfy the research security training requirement. FAU will accept either the 4-hour Research Security Training course or the condensed 1-hour Research Security Training to satisfy the initial requirement.

Since this requirement must be completed prior to proposal application submission, we encourage faculty to complete this course now rather than wait until proposal application. Incomplete trainings for any key personnel on the proposal application will delay/prevent the proposal from being submitted.

NATIONAL SCIENCE FOUNDATION

Effective June 7th, 2025 all PIs or Co-PIs named on a NSF award must certify annually in Research.gov that they are not a party to a Malign Foreign Talent Recruitment Program (MFTRP). Individuals who are a party to a Malign Foreign Talent Recruitment Program are not eligible to serve as a senior/key person on an NSF project. The certification applies to awards issued on or

after May 20, 2024 and will be obtained annually when submitting progress reports via Research.gov.

What you need to know about completing the required MFTRP certification in Research.gov:

- There is no organizational certification requirement, the certification requirement is for PIs and co-PIs.
- Impacted PIs and co-PIs will be prompted to complete the MFTRP certification after signing into Research.gov using the Sign In link at the top of www.Research.gov.
- PIs and co-PIs with more than one active award made on or after May 20, 2024, are only required to certify once, annually.
- Once completed, PIs and co-PIs can view their MFTRP certification response under the Academic/Professional Information section of their profile.
- NSF is working to expand the MFTRP annual certification requirement for all senior/key personnel roles at a future date. Additionally, NSF is working to provide organizations with access to the annual certifications.
- Please see PAPPG Chapter II.D.1.d(ix) for information about Authorized Organizational Representative (AOR) responsibilities regarding senior/key personnel MFTRP certifications.
- Frequently Asked Questions and MFTRP contract examples will be available on the MFTRP section of the Office of the Chief of Research Security Strategy and Policy website shortly.

*Please be advised, it is expected the research security training requirement and MFTRP certification will become a requirement from all federal sponsors sometime in 2025.