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To: Research Faculty <ResearchFaculty@westernu.edu>, University Executive Operations Team <UEOT@westernu.edu>

Cc: Directors of Operations <DirectorsofOperations@westernu.edu>, Andrea Giuffrida <agiuffrida@westernu.edu>, Matthew Katz <mkatz@westernu.edu>, Jennifer Baker <jbaker@westernu.edu>

Subject: Important: NIH Notice 133 & NSF Notice 149 — Required Training, Disclosures, and Deadlines for Senior/Key Personnel on Federally-funded Proposals or Awards

(Sent on behalf of Dr. Andrea Giuffrida, Senior Vice President-Office of Research and Biotechnology)

Dear Research Faculty,

I would like to bring to your attention new compliance requirements outlined in *NIH Notice OD-25-133* and ***NSF Important Notice No. 149***:

NSF: https://www.nsf.gov/notices/important/important-notice-no-149-updates-nsf-research-security/in149?utm_source=chatgpt.com

NIH: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-133.html>

These updates introduce critical obligations for all senior/key personnel on federally funded proposals and awards. Please review the following key requirements and associated deadlines carefully:

NSF Requirements (Effective October 10, 2025)

1. Research Security Training:

All senior/key personnel (e.g., PIs, co-PIs, project personnel, and senior/key staff) must complete the **approved research security training¹** (see **below**) within **12 months prior to each NSF proposal submission**. This must also be certified by the Authorized Organizational Representative (AOR) at the time of proposal.

2. Research Security Assessment & Documentation:

Our Institution must retain, and have available upon request, supporting documentation for all covered senior/key personnel listed on NSF-funded proposals or awards. This includes records of foreign appointments, employment with foreign institutions, participation in foreign talent programs, and any current or pending (other) support. Please, maintain proper records of your documentation related to foreign activities and share it with the Office of the Vice President for Research & Biotechnology.

3. Malign Foreign Talent Recruitment Program (MFTRP) Prohibition & Certification²:

- **Prohibition:** Anyone actively engaged in a MFTRP is ineligible to serve as senior/key personnel on NSF proposals or awards. (This prohibition has been in effect since May 20, 2024.)

- **Certification:**

- *Pre-Award:* The AOR and each senior/key individual on NSF proposals or awards must certify non-participation in an MFTRP².
- *Post-Award:* PIs and co-PIs must certify annually via Research.gov their participation - or non-participation - in an MFTRP².

4. **Foreign Financial Disclosure Reporting (FFDR)³:**

WesternU must report, on an annual basis, all foreign financial support of **\$50,000 or more** (including gifts or contracts) received directly or indirectly from foreign sources associated with countries of concern. The **deadline for this year is October 1, 2025. Countries of concern are defined as** the People's Republic of China including Hong Kong and Macau, the Democratic People's Republic of Korea, the Russian Federation, the Islamic Republic of Iran, or any other country determined to be a country of concern by the Secretary of State.

NIH Requirements (Notice OD-25-133)

1. **Training on Other Support Disclosure Requirements:**

Effective October 1, 2025, the NIH will require all covered senior/key personnel on NIH proposals to complete the **approved research security training¹** (see **below**) within **12 months prior to proposal submission**. In addition, all covered senior /key personnel on NIH proposals must accurately disclose "Other Support" (**Other Support form**), including foreign and domestic activities, prior to submitting proposals or progress reports. For more information, click here: https://grants.nih.gov/grants/policy/nihqps/HTML5/section_2/2.5.1_just-in-time_procedures.htm?Highlight=%22other%20support%22

2. **Foreign Justification: NIH requires all applicants to include a "Foreign Justification" in "Other Attachments" when the project involves activities outside the United States or partnerships with international collaborators.**

NIH applicants and research administrators should carefully review and follow all SF424 instructions and requirements prior to submitting proposals. Note: Many instructions have been updated, and applicants should check federal sponsor websites frequently for changes to Notices of Funding Opportunity (NOFOs) and guidance to ensure they are following the most recent versions

3. **Updated Biosketches and Other Support Documentation:**

All foreign appointments, affiliations, or support must be disclosed. Documentation (e.g., contracts, agreements) may be requested by the sponsor in English.

Action Items & Next Steps

¹Complete Research Security Training: To ensure comprehensive compliance, all senior/key research personnel listed on federal grants must complete the required Research Security Training Module in CITI before submitting NIH or NSF or other federal grant proposals. This training complies with requirements from the CHIPS and Science Act of 2022, NSPM-33, and directives from the Department of Energy (DOE), the National Science Foundation (NSF), and the National Institutes of Health (NIH). The Research Security Training requirement can be met by completing the Research Security Training Module in CITI covering:

- Introduction to Research Security
- The Importance of Disclosure
- Risk Mitigation and Management
- The Importance of International Collaboration

Research Security Training Enrollment Steps:

- Follow the link to CITI (<https://www.citiprogram.org/index.cfm?pageID=668>)
- Select “LOG IN THROUGH MY ORGANIZATION” and select Western University of Health Sciences
- Login using your WesternU credentials
- At the bottom of your profile screen, click on “ADD A COURSE”
- Select Question 11 and choose Research Security Basic Training
- Complete the Research Security Course

If you have not registered for CITI, need assistance with adding the course to your profile, or any other questions, please email ORRA or Matt Katz (mkatz@westernu.edu).

Research Security Training Verification

The Office of Sponsored Programs and Contracts Management (OSPCM) will verify that individuals named in federal proposals have completed training in alignment with sponsor policies.

Update and Retain Documentation: Gather and securely store documentation concerning relevant foreign affiliations, employment, talent program participation, and current/pending support.

²Certify Non-Participation in MFTRP: Each senior/key individual planning to submit a federal grant application, should complete a **pre-award non-participation certification** signed by the AOR. The Pre-Award Certification Form will be provided by

OSPCM. PIs and co-PIs should plan to certify annually **post-award** through Research.gov. **Instructions on how to submit post-award certification are attached to this email.**

³Prepare FFDR: Notify the Research Office immediately if you received any qualifying foreign support (\geq \$50,000), so we can capture it in the upcoming annual report due on October 1, 2025.

Institutional Policy Development: The University is in the process of developing a formal policy on foreign fund sources to address new regulatory requirements. This policy will be shared with the campus community once it has been finalized.

Contact & Resources

Our Office of Research is here to support you. If you have questions, need help accessing training modules, or require assistance gathering documentation, please reach out to:

- **Matt Katz, Office of Sponsored Programs and Contracts Management, mkatz@westernu.edu**
- **Jennifer Baker, Office of Research Regulatory Affairs, jbaker@westernu.edu**

We appreciate your attention to these crucial obligations, which help safeguard the integrity of our institution's research and comply with federal requirements.

Thank you for your prompt cooperation.

Andrea Giuffrida

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