



NSF SECURE Center Research Security Briefing

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The SECURE Center distributes research security briefings and timely alerts via its listserv. The Briefing provides a centralized resource for research security-related information, including new statutory and research funding agency requirements, new or updated federal and community resources, and significant news items and scholarly works. The Center will also assess and provide commentary, interpretation, or implementation considerations on new requirements, notices and resources, working with higher education associations, legal partners, or agencies as needed.

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Federal Agency Updates

Updated Implementation Guidance of NIH Policy on Foreign Subawards for Active Projects (Notice Number: [NOT-OD-25-130](#), issued July 18, 2025)

In keeping with its goals related to research security, NIH provided this updated guidance on the policy for existing projects and submitted applications related to the implementation of the NIH Policy on Foreign Subawards (see [NOT-OD-25-104](#)).

This updated guidance creates an alternative, short-term approach for existing grants and cooperative agreements involving human subjects research (e.g., clinical trials and clinical research) with foreign sites. The alternative approach involves removing a foreign sub-award from the primary award and having it issued as a foreign supplement award. It is noted that each foreign supplement award can only be issued to a single foreign entity.

By choosing this pathway, and so that NIH can ensure its financial management and reporting obligations:

...both the primary award and foreign supplement(s) will be removed from the streamlined non-competing award process (SNAP) and automatic carryover authority. The primary award and each foreign supplement will be issued with a distinct document number and will need to submit separate annual Federal Financial Reports (FFR, SF-425).

No re-budgeting will be allowed between the primary award and supplements within a budget period. As indicated in the prior notice, prime awardees can use the annual RPPR process to request a reallocation of funds across the entire project, provided the total cost does not increase.

NIH was careful to point out:

This supplement option is in addition to, and not in lieu of, the other options outlined in NOT-OD-25-104; namely, ICOs may renegotiate with the primary recipients to move activities to a domestic organization, remove the scope of the foreign component from the overall project scope, or bilaterally terminate the award. Additionally, this supplement option is meant to be a short-term solution, permitted only for the current competitive segment, and it does not replace the new award structure announced in NOT-OD-25-104 that will apply to upcoming applications, including any planned renewals.

NIH Announces a New Policy Requirement to Train Senior/Key Personnel on Other Support Disclosure Requirements

On July 17, 2025, NIH issued [NOT-OD-25-133](#), a new policy requirement to train senior/key personnel on the requirement to disclose all research activities and affiliations in Other Support. The training requirement is effective October 1, 2025, and notes the availability of the federal research security training (RST) modules on the [NSF website](#).

NSF's July 10, 2025 Important Notice No. 149, referencing the NSF-funded SECURE Center's [condensed version of the federal RST modules](#), indicated that "NSF, NIH, DOE, and DOD all recognize completion of the condensed module as compliant with their respective RST requirements." NSF is leading the coordination of federal research funding agency implementation of research security requirements under a memorandum of agreement, working with these and other agencies. The training includes extensive information on federal disclosure requirements for biosketches and current and pending support.

Per the NOT-OD-25-133, "recipients must implement trainings in addition to maintaining a written and enforced policy on requirements for the disclosure of other support to ensure Senior/Key Personnel fully understand their responsibility to disclose." Additional information and clarification on these requirements will be included in future briefings as they become available.

U.S. Department of Education Opens Foreign Funding Investigation into the University of Michigan

Following [two separate incidents](#) involving criminal charges against Chinese nationals with ties to the University of Michigan (UM), on July 15, 2025, the US Department of Education (ED) opened a foreign funding investigation into the university. In a [letter](#) sent to UM Interim President Domenico Grasso, ED requests a variety of documents pertaining to UM's compliance with Higher Education Act [Section 117](#) the university's international research collaborations, and research security program. Since April 2025, [similar records requests](#) have been sent to Harvard University, the University of California-Berkeley, and the University of Pennsylvania.

US Secretary of Agriculture Issues *America First Memorandum for USDA Arrangements and Research Security*

On July 8, 2025, US Secretary of Agriculture Brooke Rollins issued the *America First Memorandum for USDA Arrangements and Research Security*. The [memorandum](#) came on the same day that the US Department of Agriculture (USDA) issued its *National Farm Security [Action Plan](#)*.

In the memo, Secretary Rollins directs USDA to undertake initiatives intended to “place America First in provisioning all USDA funds, regardless of source and in accordance with any statutory or legal requirements,” and to prevent “the expenditure of American taxpayer funds to help foreign competitors out-produce, out-compete, and out-innovate the United States.” Directives include a number of research security-related measures that will impact institutions that are recipients of USDA funding and individuals involved in the design, conduct, or reporting of USDA-funded efforts (i.e., covered individuals).

Agency Review of Existing Arrangements and Justification of New Arrangements

- Within 30 days, all USDA Mission Areas, Agencies, and Offices must conduct a comprehensive review of all current USDA awards and subawards “with any foreign person or entity or any U.S. citizen or entity subject to foreign ownership, control, or influence,” including justification as to why a US recipient was not selected for all applicable awards/subawards. USDA Mission Areas, Agencies, and Offices must submit lists of applicable awards/subawards for review by the Office of Homeland Security, Office of the General Counsel, and Office of the Chief Scientist. After review, these offices will make recommendations to the Secretary on which awards, if any, “should be terminated due to potential risks to American agriculture.”
- Effective immediately, prior to issuing any awards/subawards “with any foreign person or entity or any U.S. citizen or entity subject to foreign ownership, control, or influence,” all USDA Mission Areas, Agencies, and Offices must provide justification for the arrangement to Office of Homeland Security, the Office of General Counsel, and the Office of the Chief Scientist and receive the approval of those offices prior to executing the arrangement.

Impacts on Applicants

Similar to requirements that have been implemented by other federal funding agencies, the memo requires USDA research and development (R&D) and science and technology (S&T) awards to include a number of research security-related terms and conditions for applicants. While not specifically defined in the memo, it is presumed that “applicants” has a definition similar to that of “covered individual” in NSPM-33 and other federal agency guidance (i.e., an individual who significantly contributes to the scientific development or execution of a research and development project funded or proposed for funding by the U.S. government).

Applicants are required to:

- Complete the [Common Forms](#) for Biographical Sketches and Current and Pending (Other) Support, and provide updated information annually throughout the duration of the award,



- Certify that research security training has been completed not more than one year prior to the date of application. Per the memorandum, USDA is requiring an annual recertification.
- Certify they are not a participant in a malign foreign talent recruitment program (MFTRP), and recertify annually.

Unlike research security-related requirements implemented by other federal funding agencies, USDA will also require applicants to:

- “Certify that they are not contracting, entering into arrangement with, or otherwise providing material or non-material benefit through the provision of funded or unfunded work to any foreign person or entity or any U.S. citizen or entity subject to foreign ownership, control, or influence by a country of concern or other foreign adversary unless appealed to and approved by the Secretary of Agriculture.” “Certify that they are not party to utilizing forced labor, or partnering with universities who are party to utilizing forced labor;”
- “Complete a disclosure (updated annually) of contracts associated with participation in programs sponsored by foreign governments, foreign instrumentalities, or foreign entities including FTRPs;”
- “Seek approval from USDA to subaward any portion of a funded arrangement, including but not limited to university students, post-doctoral fellows, [and] visiting researchers.”

Impacts on Employing Entities

The Secretary’s memo includes requirements for certifications from “Employing Entities” like those implemented by other federal funding agencies, including certification of applicants’ completion of research security training and awareness of the requirements outlined in the memo.

Unlike requirements from other federal funding agencies, the USDA memo also requires that Employing Entities:

- “Prohibit applicants who either are currently or have in the past 10 years participated in malign FTRPs from working on projects supported by R&D and S&T awards.” The 10-year timeframe of this requirement may necessitate that Employing Entities collect data from their faculty from a period that *predates* widespread national awareness of malign foreign talent recruitment programs (MFTRPs). Since most Employing Entities did not become aware of or begin requiring specific disclosure information regarding MFTRPs until roughly 2019 and, per the USDA requirement, Employing Entities must prevent *past* participants in MFTRPs back to 2015 from working on USDA projects, then those entities may need to implement mechanisms to collect this specific information (i.e., request “retroactive” disclosure of MFTRP participation).



- “Provide any supporting documentation, including copies of contracts, grants, or any other agreement, specific to foreign appointments, employment with a foreign institution, participation in a FTRP, and other information reported as current and pending support for all applicants in an application.” To date, only the National Institutes of Health (NIH) have required that this type of supporting documentation be provided as part of the application process. Other agencies, such as NSF, require that it be provided on request.
- “Review any documents required under this memorandum for compliance with USDA award terms and conditions, including guidance on conflicts of interest and conflicts of commitment.”

Regarding implementation, per the memo, “Each Mission Area, Agency, or Office that administers arrangements shall be responsible for implementing and ensuring compliance with all aspects of this memorandum.”

Research Security News and Reports

*Please note, articles linked below may require a subscription to view.
NSF SECURE Center cannot distribute copies of subscription-based articles.*

UT Knoxville Cuts Chinese Scholarship Program Under Pressure From House (*Inside Higher Ed*, 7/22/2025): “Under threat from Republican lawmakers, the University of Tennessee, Knoxville ended a scholarship partnership for Chinese students. ([more](#))

US farm agency fires 70 foreign researchers following national security review (*Reuters*, 7/18/2025): Reuters reports the USDA stated it had fired 70 foreign contract researchers as part of its efforts to secure the US food supply. The contractors, mostly post-docs, had worked at the Agricultural Research Service within the USDA. ([more](#))

Danish universities reject foreign researchers amid espionage fears (*Euronews*, 7/17/2025): Danish universities are conducting a higher scrutiny of proposed foreign researchers focusing on Russia, Iran and China, with Aarhus University rejecting 24 researchers so far this year. ([more](#))

Upcoming Research Security-Related Events & Conferences

NCURA Annual Meeting:

Registration is open for the 67th annual NCURA meeting in Washington DC, August 10 - 13, 2025. The event includes a number of research security-related offerings, including concurrent sessions and a pre-meeting workshop. ([more](#))

Research-Security Related Sessions at Upcoming NCURA Annual Meeting:

- Research Security and Export Controls for the Research Administrator
- Research Security Programs: Agency Implementations and the Road to Compliance
- Managing Compliance in the Proposal Process
- Leveraging ORCID in Research Administration
- Building Capacity to Manage RISC: Investing in Research Integrity, Security, and Compliance at Mid-Sized and Smaller MSIs and HBCUs

Additional details and meeting registration information are available [here](#).

FDP Virtual Meeting:

Registration is now open for the Federal Demonstration Partnership (FDP) Virtual September 2025 meeting, taking place Monday, September 15th (11 AM ET – 5 PM ET), Tuesday, September 16th (11 AM ET – 5 PM ET) and Wednesday, September 17th (11 AM ET - 2 PM ET). ([more](#))

COGR October Meeting:

Registration is now open for our October 23-24, 2025 meeting in Washington D.C. at the Washington Marriott in Georgetown. ([more](#))

Save the Date for ASCE 2026:

Mark your calendars now for the 2026 Academic Security and Counter Exploitation Program. Next year is the 10th anniversary of the largest research security conference in the world: February 24 - 26, 2026. through noon (CST) on August 31, 2025. Proposals are being accepted through noon (CST) on August 31, 2025 ([more](#))

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