



# NSF SECURE Center Research Security Briefing

*Safeguarding the Entire Community in the U.S. Research Ecosystem (SECURE)*

Issue 2 - July 10, 2025

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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

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### Department of Defense (DoD) Publishes Updated 1286 List

On June 24, 2025, the DoD published its annual (FY24) [update to the 1286 list](#). DoD reaffirmed the FY23 list of foreign talent recruitment programs that pose a threat to national security. The lists are required under the FY19 National Defense Authorization Act. Per the introduction, “Caution is advised for any researcher or institution engaging with institutions” on the 1286 list. The list is one of several DoD, DOE and NSF use in risk reviews of fundamental research proposals.

### NSF Updates to Research Security Policies

The National Science Foundation issued [Important Notice 149](#), *Updates to NSF Research Security Policies*, on June 30, 2025. The notice includes NSF implementation of six requirements in alignment with the CHIPS and Science Act and National Security Presidential Memorandum 33.

1. Research Security Assessment and Required Recipient Documentation – Effective October 1, 2025 – “NSF proposers and recipients are required to maintain supporting documentation, including copies of contracts, grants, or any other agreements specific to foreign appointments, employment with a foreign institution, participation in a foreign talent recruitment program and other information reported as current and pending (other) support for all senior/key personnel that must be available to NSF upon request,” as previously required, and to have reviewed it for compliance with NSF terms and conditions.
2. Research Security Training – Effective: October 1, 2025 – Individuals identified as a senior/key person must certify that they have completed research security training (RST) within 12 months prior to proposal submission. The Department of Energy previously implemented this requirement effective May 1, 2025.

The notice notes the four research security training modules made available on the NSF website as a resource to awardee organizations. The notice indicates that the SECURE Center has developed an updated and [condensed version](#) of the four modules designed to meet the government-wide training requirement in the CHIPS and Science Act. Per the notice, NSF, NIH, DOE, and DOD all recognize completion of the condensed module as compliant with their respective RST requirements. Consistent with previous guidance, the notice indicates that “Proposers may utilize *any training* [emphasis added] that addresses cybersecurity, international collaboration, foreign interference, and rules for proper use of funds, disclosure, conflict of commitment, and conflict of interest.”

Institution’s Authorized Organizational Representative (AOR) must also certify that all individuals identified as senior/key personnel have completed the requisite research security training and that the institution has a plan to provide appropriate training and oversight in the responsible and ethical conduct of research that meets the CHIPS Act requirements.

3. Malign Foreign Talent Recruitment Program Prohibition (MFTRP) – In Effect – Individuals who are a current party to a MFTRP are not eligible to serve as a senior/key person on an NSF proposal or any award made after May 20, 2024.
4. MFTRP Certification – In Effect – NSF requires MFTRP certifications from proposers (AORs) and individuals identified as senior/key personnel at the time of proposal and annually by individuals serving as a PI or co-PI on an active NSF award made on or after May 20, 2024 via [Research.gov](https://www.research.gov). See the description in the [June 25 SECURE Center RS briefing](#).
5. Foreign Financial Disclosure Reporting (FFDR) – In Effect – This requirement became effective in July 2024. The current reporting period is from July 1, 2024 through June 30, 2025. However, per the notice, “to provide sufficient time for finalization and submission of the requisite information, the FFDR reporting portal on Research.gov will open for report submissions September 1, 2025, and the report must be submitted by October 31, 2025.” In taking this approach, we note that NSF is maintaining consistency with the Higher Education Act Section 117 reporting period while allowing institutional staff to submit the report at a later date to avoid additional reporting during fiscal year end.

The notice indicates that “The institution will maintain a copy of the relevant records subject to the disclosure requirement until the latest of:

- the date that is four years after the end date of the award;
- the date on which the agreement terminates; or
- the last day of any period that applicable State public record law requires a copy of such agreement to be maintained.”

The notice also indicates that “upon review of a submitted disclosure, NSF may request that copies be submitted of any contracts, agreements, or documentation of financial transactions associated with disclosures submitted under this section.”

6. Certification Regarding IHEs Hosting or Supporting Confucius Institutes – Effective October 1, 2025 – Details can be found in the notice. Currently IHEs are not hosting or supporting Confucius Institutes.

## Professional Association Meetings & Resources

Video Recordings Now Available from National Academies May 2025 Workshop: Assessing Research Security Efforts in Higher Education

Video recordings are [now available](#) from the National Academies of Sciences, Engineering, and Medicine workshop held May 22-23, 2025, to consider potential measures of effectiveness and performance, and the data needed to assess research security and protection efforts in higher education by a range of Federal agencies.

Workshop sessions included:

- The US Department of Defense, Research, and the Research Security Environment
- Research Security Policies and Requirements - Scope and Measures of Effectiveness

- The Impact of Research Security Policies and Requirements on the Research Ecosystem
- Advancing Research Security in the Research Community
- The Path Forward for the U.S. Department of Defense and Other Funding Agencies

SECURE Center team members Amanda Humphrey and Lisa Nichols serve on this National Academies Working Group, and team members Lori Schultz and Jason Owen-Smith served as session panelists.

Research-Security Related Sessions at Upcoming NCURA Annual Meeting  
The National Council of University Research Administrators (NCURA) will hold its 67<sup>th</sup> Annual Meeting in Washington DC, August 10-13, 2025.

Research-security related sessions include:

- 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](#).

## U.S. Congressional Activities

House Committee Chairs Send Letters to University of Michigan, NSF, NIH Following Arrest of Chinese Nationals

Following two separate incidents involving Chinese nationals with ties to the University of Michigan (UM), the Chairs of three US House of Representatives Committees recently issued records request letters to both UM and the heads of [NIH and NSF](#).

On June 3, 2025, the Justice Department [announced charges](#) against two Chinese nationals, Yunqing Jian and Zunyong Liu, accusing the pair of conspiracy, smuggling goods into the United States, false statements, and visa fraud. According to the complaint, Mr. Liu smuggled *Fusarium graminearum*—a fungus that causes “head blight” in wheat and other grains — into America to further study the pathogen at the UM lab where Ms. Jian worked as a research fellow.

In a separate incident, Chenxuan Han — also a Chinese national — arrived at Detroit Metropolitan Airport on June 8, 2025, to begin work at UM as a visiting scholar from the College of Life Science and Technology in the Huazhong University of Science and Technology (HUST) in Wuhan, China, where she is pursuing her PhD. Upon arrival in Detroit, Han was arrested and charged with smuggling goods into the US and making false statements. [According to the complaint](#), from 2024 to 2025 Han sent four packages addressed to recipients at UM that contained concealed biologic material. On June 18, 2025, US House of Representatives Committee Chairs John Moolenaar (Select

Committee on the CCP), Tim Walberg (Committee on Education and Workforce), and Brian Babin (Committee on Science, Space, and Technology) [sent a letter](#) to NIH Director Jay Bhattacharya and NSF Interim Director Brian Stone. The letter expresses concern about the incidents and, in particular, Jian, Liu, and Han's alleged ties to the Chinese Communist Party (CCP). It also poses several questions to NIH and NSF regarding the funding the agencies provided in support of professors Libo Shan and Ping He, the faculty members with whom Jian and Liu worked while at UM.

The letter requests NIH and NSF to “conduct a full review of all grants awarded to the UM’s Molecular Plant-Microbe Interaction Laboratory, including Professors He and Shan, to determine whether any restrictions or prohibitions—pursuant to grant terms and conditions, agency policy and regulations, or federal statutes—have been violated.” The letter also requests that the agencies respond to specific questions regarding:

- The agencies’ due diligence risk analysis for awards to Professors Shan and He
- Proposal and program review documents for awards to Professors Shan and He
- The agencies’ knowledge or review of the faculty members’ potential dual affiliations with China Agricultural University while simultaneously holding positions at Texas A&M University
- Travel expenses paid by the agencies for Jian or Liu, and any travel to China by Professors Shan and He during the time that Jian or Liu worked under them

In addition, the letter poses broader questions to the agencies regarding:

- Compliance, monitoring, and additional due diligence pre-award, post-award, and during the period of performance
- Dual use research of concern (DURC) and potential weaponization of fundamental research
- Protection of intellectual property and scientific expertise
- Coordination/information-sharing across federal agencies

On the same day, the Committee Chairs [sent a similar letter](#) to UM President Domenico Grasso. The letter to UM requests information and documentation in response to a series of 24 questions covering many of the same topics included in the letter to NIH and NSF. However, the UM letter also includes topics specific to UM’s policies, processes, and procedures regarding:

- Physical access and security, including how potential biohazards may arrive on campus
- Vetting of visiting scholars/researchers
- Review and approval of dual appointments
- Disclosure requirements, including consequences for noncompliance
- Compliance, monitoring, and additional due diligence on faculty during their employment
- The status of the university’s establishment of a research security program office as outlined in the [Guidelines for Research Security Programs at Covered Institutions](#)
- If and how UM shares information with external entities including federal agencies and the US Intelligence Community

In addition to the Chairs, the letters were co-signed by 22 other Members of Congress from the three committees.

Congress requests GAO report on Research Security Program implementation  
On June 24, 2025, the House Committee on Science, Space and Technology sent a [letter](#) to the Government Accountability Office (GAO) Comptroller General. The letter requests that GAO conduct a review of federal agencies' and research institutions' implementation of research security guidelines, as well as agencies efforts to measure the effect of research security requirements.

## 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 several research security-related offerings, including concurrent sessions and a pre-meeting workshop. ([more](#))

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 the 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. Proposals are being accepted through noon (CST) on August 31, 2025 ([more](#))

## Other Research Security News

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

How Harvard's Ties to China Helped Make It a White House Target (*New York Times*, 7/7/2025): "Harvard turned to international donors, including China, as one way to help save it from financial troubles. That money is dwindling, but Republicans are questioning the relationship." ([more](#))

Grand Jury Indicts Russian Scientist on Smuggling Charges (*New York Times*, 6/25/2025): "A federal grand jury in Boston on Wednesday indicted Kseniia Petrova, a Russian researcher who works in a laboratory at Harvard Medical School, on criminal charges of smuggling goods into the United States and lying to customs officials." ([more](#))

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