

Quick Reference Table - Research Security & Compliance Requirements

Agency	Stage	Research Security (RS) Training	Sponsored Research & Compliance (SRC) Training	Responsible and Ethical Conduct of Research (RECR) Training	FCOI/COI Disclosure	FCOI Training	Current & Pending Support and Biographical Sketch	Malign Foreign Talent Recruitment Program Certification (MFTRP) Certification ²	Other Training Requirements	Notes
NSF	Proposal	Senior/key personnel must complete RS training within 12 months before submission (effective Oct 10, 2025; AOR certifies)	-	-	All financial disclosures required at proposal submission (effective Oct 1, 2025).	-	Common Forms required in SciENcv (effective May 20, 2024).	Certification of non-participation included in Current & Pending and Biosketch.	-	https://www.nsf.gov/notices/important/important-notice-no-149-updates-nsf-research-security/in149?utm_source=
	Award	Required	Required	Required for students, postdocs, faculty, and senior/key personnel supported by the award.	Required — verify current/updated and within 30 days of new SFI (effective Oct 1, 2025).	-	Updates reported in annual technical reports.	Annual certification required in Research.gov for awards made after May 20, 2024 (effective June 7, 2025).	-	https://www.nsf.gov/policies/biopro/24-11ch-9-recipient-standards?utm_source=
DOE	Proposal	Covered individuals must complete RS training within 12 months before submission (effective May 1, 2025).	-	-	Required—proposal specific.	-	Common Forms required in SciENcv.	Certification of non-participation included in Current & Pending and Biosketch.	-	
	Award	Required	Required	-	Required — verify current/updated and within 30 days of new SFI.	Required every 4 years (DOE FCOI).	Changes must be disclosed within 30 days or per program office guidance.	-	CUI training is required if the award includes CUI. Must be completed prior to the award release.	-
NIH	Proposal	RS certification collected through SciENcv Biosketch (effective May 25, 2026).	-	-	Required	-	Common Forms required for applications, RPPR, JIT, and Prior Approval (effective Jan 25, 2026; leniency through May 2026).	MFTRP certification implemented with Common Forms (effective Jan 25, 2026).	Senior/Key Personnel must complete "Other Support" disclosure training before proposal submission (effective Oct 1, 2025).	-
	Award	Required (effective May 25, 2026).	Required	Required for specific mechanisms (training, career development, fellowships, research education); ≥8 contact hours with in-person component at least once per career stage (~every 4 yrs).	Required — verify current/updated and within 30 days of new SFI.	Required every 4 years (PHS FCOI).	Changes included in annual RPPRs (leniency through May 2026).	-	Senior/Key Personnel must remain current on "Other Support" disclosure training.	-
NASA	Proposal	Effective Aug 5, 2026.	-	-	Required	-	Common Forms required as of Oct 2024.	Certification of non-participation included in Current & Pending and Biosketch.	-	https://public-inspection.federalregister.gov/2024-14170.pdf?1719492320
	Award	Effective Aug 5, 2026.	Required	-	Required — verify current/updated and within 30 days of new SFI.	-	Changes must be submitted to the NASA Program Officer within 30 days.	Annual certification required.	CUI training is required if the award includes CUI and must be completed prior to the award release.	-
DoD	Proposal	Not announced	-	-	-	-	-	Participation in MFTRP is prohibited; certifications will be implemented with Common Forms.	-	-
	Award	Required on a project-by-project basis	Required	-	-	-	-	-	CUI training is required when the contract includes CUI requirements and must be completed prior to the award release.	-
USDA	Proposal	Must complete within the 12 months before submission	-	-	-	-	Common Form are optional.	Certification of non-participation included in Current & Pending and Biosketch.	-	https://www.usda.gov/directives/s/m-1078-014
	Award	Must recertify annually for the duration of the award.	Required	RCR training required for PIs/Key Personnel/Investigators on NIFA programs	-	-	-	Must recertify annually for the duration of the award.	CUI training is required if the award includes CUI and must be completed prior to the award release.	-
All Other Agencies	Proposal	-	-	-	-	-	-	-	-	-
	Award	-	Required	-	-	-	-	-	-	-

*Updated 3/18/2026

Covered Individual Definition:

A "covered individual" is anyone who contributes meaningfully to the scientific development or execution of a federally funded research project. This includes:

- Principal Investigators (PIs)
- Co-PIs and Co-Investigators
- Postdoctoral Associates
- Faculty Associates
- Project Managers

Agencies may define this differently; always refer to the specific solicitation or award terms.