

DRAFT: Institutional-Related Requirements Under Key Documents Pertaining to Federal Research Funding and Inappropriate Foreign Influence							
Key Questions/Issues	NSM-33	JCORE Recommendations	NDA 2021 Section 223	NSF Documents Re. COI & COC (2020 PAPP, FAQs, etc.)	NIH GPS & Associated Documents (Notices, FAQs, PHS Regulations on Objectivity in Research)	Key Differences	Comments
Definitions of Key Terms							
Conflict of Interest (COI)	Situation in which an individual, or the individual's spouse or dependent children, has a financial interest or financial relationship that could directly and significantly affect the design, conduct, reporting, or funding of research."	Same definition used in NSM-33.	No definition.	"COI" = When reviewer(s) reasonably determine that a significant financial interest could directly and significantly affect the design, conduct, or reporting of NSF-funded research or educational activities."	Financial COI = A significant financial interest that could directly and significantly affect the design, conduct or reporting of PHS-funded research."	*Unlike NIH & NSR the JCORE Recommendations and NSM-33: (a) do not have financial threshold requirements; (b) include affect on "funding of research."	
Conflict of Commitment (COC)	Situation in which an individual accepts or incurs conflicting obligations between or among multiple employers or other entities. Many institutional policies define conflicts of commitment as conflicting commitments of time and effort, including obligations to dedicate time in excess of institutional or funding agency policies or commitments. Other types of conflicting obligations, including obligations to share improperly information with, or to withhold information from, an employer or funding agency, can also threaten research security and integrity, and are an element of a broader concept of conflicts of commitment."	Same definition used in NSM-33.	No definition.	No definition.	No definition		NSM-33 & JCORE Recommendations definition Includes contractual non-disclosure provisions that are common in many consulting contracts as an example of a COC.
Current & Pending [Research] Support	See definition of "Other Support."	See definition of "Other Support."	All resources made available or expected to be made available to an individual in support of the individual's research and development efforts. Includes foreign and domestic sources, sources made available to applicant institution or directly to individual, w/ or w/o monetary value, and in-kind contributions requiring a commitment of time and directly supporting individual's R&D efforts (e.g., office/lab space, equipment, supplies, employees, students).	All resources made available to an individual in support of and/or related to all of his/her research efforts, regardless of whether or not they have monetary value." Includes in-kind contributions with an associated time commitment. Does not include support provided directly to postdocs from an other organization. Does not include consulting activities unless the individual is conducting research as part of the consulting.	See definition of Other Support.	*NDA 2021 and NSF define "current and pending support" v. JCORE, NSM and NIH which define "other support." *NDA 2021 definition is narrower than NSF definition because it is limited to resources "in support of the individual's research and development efforts." For this reason, it also is narrower than JCORE and NSM-33 definitions of "Other Support." *NSF definition has exclusions that are not found in the other definitions such as support provided to postdocs from another organization and consulting that does not involve research. *NSF definition also introduces the concept of time commitment with respect to reporting in-kind contributions. In-kind contribution not intended for use on the NSF project/proposal and with no associated time commitment do not need to be reported.	
Foreign Government Sponsored Talent Recruitment Program (FGSTP)	An effort directly or indirectly organized managed or funded by a foreign government or institution to recruit S&T professionals or students (regardless of citizenship or national origin, and whether having a full-time or part time position."	Same definition used in NSM-33.	No definition.	No definition.	No definition	No definition	
Other Support	Other support, contractual or otherwise, direct and indirect, including current and pending private and public sources of funding or income, both foreign and domestic. For researchers this includes "all resources made available to a researcher in support of and/or related to all of their professional R&D efforts, including resources provided directly to the individual rather than through the research institution, and regardless of whether or not they have monetary value. Includes: foreign and domestic sources, in-kind (lab/office space, equipment, supplies, equipment; gifts with terms/conditions; financial support for lab personnel; students/visiting researchers supported by outside sources.	Same definition used in NSM-33.	See definition of Current & Pending Support.	See definition of Current & Pending Support.	All financial resources, whether federal, non-federal, commercial or institutional, available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts and/or institutional awards. Includes support provided to applicant entity or to individual investigator from foreign and domestic sources. Includes in-kind support (e.g., lab/office space, supplies, equipment, employees").	*NDA 2021 definition of Current & Pending Research Support is narrower than JCORE and NSM-33 definitions of Other Support. *NDA 2021 definition is limited to resources "in support of the individual's research and development efforts." *JCORE and NSM-33 definition extends to "all resources made available to a researcher in support of and/or related to all of their professional R&D efforts." [Emphasis added]. This may encompass consulting that does involve research.	JCORE and NSM-33 definitions may encompass consulting that does not involve research.
U.S. R&D Enterprise	Includes "researchers at academic research institutions, independent research institutes, medical centers, and private companies, and federal government research centers and laboratories, as well as those who participate in the process of allocating and awarding federal R&D funding."	No definition of this exact term. Defines "Federal Research & Development (R&D) funding" constitutes all funding for scientific research and development provided by the federal government. "Research" is defined as a "systematic investigation designed to develop or contribute to generalizable knowledge."	No definition of this exact term. Defines "research and development award" as "support provided to an individual or entity by a Federal research agency to carry out research and development activities" including grants, contracts, cooperative agreements, or other such transactions, except those for the procurement of goods or services to meet the administrative needs of a federal research agency. Defines "covered individual" as "individual who contributes in a substantive, meaningful way to scientific development or execution" of R&D project carried out with federal research agency R&D award and is designated as a covered individual by that agency.	No definition.	"R&D" is defined as "all research activities, both basic and applied, and all development activities that are performed by HHS award recipients. "Research" and "development" are further defined in the glossary of the NIH GPS.	See specific definitions for differences.	NDA 2021 has narrowest scope of coverage, followed by NSM-33 (although there is potential for expansion of its coverage, and then JCORE Recommendations with largest scope of coverage.

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Foreign Government Sponsored Talent Recruitment Program (FGSTP)	"An effort directly or indirectly organized, managed, or funded by a foreign government or institution to recruit S&T professionals of students (regardless of citizenship or national origin, and whether having a full-time or part time position.)"	"An effort directly or indirectly organized, managed, or funded by a foreign government, including state-owned enterprises, or a foreign institution to recruit science & technology professionals or students (regardless of citizenship or national origin, and whether having a full-time or part-time position.)"	No definition.	No definition.	No definition.	<ul style="list-style-type: none"> NSM-33 definition is subtly, but importantly different from JCORE definition. NSM includes a program organized/managed/funded "by a foreign government or institution." JCORE definition makes clear that the "foreign institution" is "organized, managed or funded by a foreign government." 	Given that the term includes "government-sponsored," the JCORE definition makes more sense.
Scope/Applicability							
Is federal funding required to trigger applicability to an institution or individual?	Not, necessarily. Disclosure requirements broadly apply to the "U.S. R&D enterprise," which potentially encompasses those who are not federally funded." Agencies are directed to require disclosures from participants in the U.S. R&D enterprise who "significantly influence the design, conduct, reporting, reviewing or funding of federally-funded research" in accordance with the specifications in NSM-33. Although disclosure requirements currently specified in NSM-33, apply to "participants in the Federally funded R&D enterprise," agencies may require disclosure of additional information and/or disclosure from a broader range of R&D enterprise participants as a matter or course or on request.	Recommendation dependent. The recommendations are directed to "research organizations" without specific reference to funding. Some recommendations reference NSM-33 with regard to standards that apply to recipients of federal F&D funding, but most are written in a way that they could apply to organizations, whether or not they received federal funding. Further, some specifically state that they apply regardless of funding source (e.g., Recommendations 6 & 10).	Yes. Applies to entities that apply for/receive research and development award from a federal agency and to individuals who meet the definition of "covered individual."	Yes. Applies to those applying for/receiving/working on NSF funded projects.	Yes. Applies to those applying for/receiving/working on NIH funded projects.	<ul style="list-style-type: none"> JCORE Recommendations have the largest scope with potential applicability of at least some of the recommendations to non-federally funded research organizations and individuals. NSM-33 has the next largest potential scope, at least with respect to disclosure requirements. At present, these are confined to participants in federally-funded R&D, but there is potential for agencies to expand to participants in the U.S. R&D enterprise," which encompasses non-federally funded entities/individuals. The statutory authority for such an expansion, however, is unclear. NDAA 2021 has a much narrower scope, as compared to the JCORE Recommendations and NSM-33. It applies to individuals who apply for/receive federal R&D funding and who "contribute in a substantive, meaningful way" to scientific development/execution of federally-funded R&D project AND are designated as a "covered individual" by the federal funding agency. 	
Is there a funding threshold to trigger applicability to individual or institution?	<ul style="list-style-type: none"> No, for individual disclosure obligations. Yes, for requirement of establishing research security program. Threshold = \$50 million per year in federal science and engineering funding. 	No.	No. [Note: There is a financial threshold \$100,000,000 extramural research expenditures for applicability to federal funding agencies.]	No.	No.	<ul style="list-style-type: none"> Major distinction between NSM-33 and JCORE Recommendations with regard to threshold at which an organization should establish a security program: "NSM- requires this for research institutions receiving >\$50 million/year in federal science/engineering support. JCORE has no financial threshold for estb. of research security program, although recommendations are supposed to be "risk-based." 	
Requirements (or Recommendations in the Case of JCORE Recommendations) & Timelines, if any							
Digital Persistent Identifiers	<ul style="list-style-type: none"> Federal funding agencies must estb. policies for researchers supported by or working on any federal research to be registered with a service that provides a DPI for that individual. <u>Due Date:</u> 1/14/22 Agencies should integrate DPis, to the extent appropriate and practicable, in standardized disclosure processes and forms for disclosure of COC and COI. <u>Due Date:</u> None 	<ul style="list-style-type: none"> Research organizations should estb. policies for research enterprise employees, contractor and affiliates to be registered with DPI service and provide "organizations" access to information disclosed via the DPI (employment, research funding, R&D affiliations, publications) in accordance with applicable laws. 	No DPI requirements.	Researchers are encouraged to use SciENcv for biosketch, which has an NSF-approved tool integrated with ORCID and facilitates connection of ORCID ID.	Persons supported by NIH training, fellowship, education or career development awards in FY 2020 and later must have an ORCID that is associated with eRA Commons Personal Profile.	NSM-33 requires funding agencies to develop policies re. registration for DPI. With exception of recipients of certain NIH-funding, current NSF/NIH requirements and JCORE Recommendations are voluntary.	

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Disclosures	<ul style="list-style-type: none"> Require disclosure of information related to potential COI and COC from "participants in the federally funded R&D enterprise" based on role. [NOTE: There is an internal inconsistency in terms of applicability. The "Roles and Responsibilities" section references disclosures from "participants in U.S. R&D enterprise who significantly influence the design, conduct, reporting, reviewing or funding of federally-funded research" while the section on specific disclosure requirements requires disclosures from "participants in federally funded R&D enterprise."] <ul style="list-style-type: none"> Must ensure federally-funded research organizations have policies/processes re. COI and COC. Due Date: Research funding agency heads must have disclosure policies by 1/14/22 Timing: Initial (part of proposal/award process, assigned relevant duties as contractor) and updates (annually or more often per change in circumstances) Categories of information to be disclosed: <ul style="list-style-type: none"> Other Support Organizational Affiliations & Employment <ul style="list-style-type: none"> FGSTP or Other Programs - Current or pending participation in (applicants to FGSTP or programs sponsored by foreign governments, instrumentalities, or entities. Institution or funding agency may require copy of contract. Positions, Appointments & Affiliations - foreign and domestic - with foreign entities, including titled, un-titled, academic, professional, institutional, with or without remuneration, FT, PT, voluntary, adjunct, visiting or honorary. Persons within "Federally Funded R&D Enterprise" Covered by Disclosures: <ul style="list-style-type: none"> PI/PI, Sr. & Key Personnel, Program Officers, Researchers at Federal Labs and Facilities (whether or not federally employed) - Must disclose all of the above categories of information. Peer reviewers, Advisory Committee or Panel Members - Must disclose all of the above except "Other Support." Other Requirements: <ul style="list-style-type: none"> Agencies must standardize disclosure processes, definitions and forms to extent practicable - coordinated by OMB, OSTP and Office of Government Ethics. Agencies may require broader disclosures or disclosures from a broader range of R&D enterprise participants. 	<ul style="list-style-type: none"> Recommends disclosures that will enable "reliable determinations" of whether/where COI and COC exist (i.e., "all information necessary to identify and assess potential" COI/COJ), and development of appropriate risk mgmt. plans. Timing: Initial disclosures on hiring/assignment of relevant duties and annual updates (with consideration of more frequent updates to reflect changes.) Categories of information to be disclosed: Categories largely mirror NSM-33 categories, and include Other Support, organizational affiliations and employment, current/pending participation in FGSTP programs, and positions/appointments/affiliations that are "relevant to the individual's relationship to the research organization." Persons Required to Disclose: Recommends requiring disclosures from researchers (including postdocs and other staff), grad students, visiting scholars performing research over extended period, contractors. Other Requirements: <ul style="list-style-type: none"> Research organizations should assist employees, affiliates and students with disclosures that are required to comply with federal funding agency requirements. Institutions should require that copies of associated contracts be disclosed on request. 	<ul style="list-style-type: none"> Requires federal research agencies to require as part of application for an R&D award that each "covered individual" disclose information about resources made available, or expected to be made available to the individual "in support of the individual's research and development efforts." Timing: At time of application for award and update at request of agency prior to award and at any time subsequent, as determined by agency. Categories of information to be disclosed: Amt., type and source of all Current and Pending Support (See definition above)/received by or expected to be received by the Covered Individual. Persons Required to Disclose: Individual who contributes in a "substantive, meaningful way to the scientific development or execution" of a R&D project proposed to be carried out with federal R&D funding AND is designated as a "covered individual" by the federal funding agency. Other Requirements: <ul style="list-style-type: none"> Individual must certify that disclosure is current, accurate and complete. Individual must agree to update disclosure on request and as determined by agency. Research institution applying for the federal funding must certify that each "covered individual" employee who is listed on funding application has been made aware of the requirements. Recommends that research organizations maintain repository of disclosure filings whether individuals are supported by federal funding. Research organizations should report COC and COI to funding agencies when appropriate, particularly when they can't be managed. Law enforcement should be notified if nondisclosure suggests illegal activity. 	<ul style="list-style-type: none"> Requires disclosure of Current & Pending Support as defined above and as detailed in NSF FAQ on Current and Pending Support at https://www.nsf.gov/bfa/dias/policy/papp/papp20_1/faqs_cps20_1.pdf NSF terms and conditions provide process for post-award disclosure of undisclosed current support and in-kind contribution information. (Article 38) 	<ul style="list-style-type: none"> Requires disclosure of Other Support as defined above and as elaborated on in NOT-OD-19-114 and NIH webpage on Protecting U.S. Biomedical Intellectual Innovation. 	<ul style="list-style-type: none"> Key Differences <ul style="list-style-type: none"> NDAAs 2021 has narrower scope because it applies to fewest people and institutions; JCORE Recommendations have the largest scope because it is potentially applicable to research institutions and their employees regardless of funding, as well as to post-docs and graduate students and visiting scholars. See comparison of differences between definitions of Other Support and Current and Pending Support above. NDAAs has additional certifications from institution and individual making disclosure that are not present in the other documents. 	
Investigation of Violations of Disclosure Requirements, Including Consequences for Violations & Information Sharing	<ul style="list-style-type: none"> Investigation: Federal funding agencies and their Inspector Generals, General Counsel, and law enforcement are to work with universities program offices and security officers and private sector to improve mechanisms/capabilities to identify and investigate violations of agency disclosure requirements. Due Date: None. Consequences: Agencies shall ensure appropriate and effective consequences for violation of disclosure requirements and other activities that threaten research security, including termination of contract/grant; removal of individual from contract/grant; suspension/sebarment/declaration of ineligibility to participate in certain activities; suspension/sebarment from receipt of federal funding; suspension/denial of Title IV funds; civil/criminal penalties. Due Date: None Information Sharing: <ul style="list-style-type: none"> Consistent with privacy laws/legal restrictions. Funding agencies will share information from researcher disclosures. Funding agencies will share information about individuals who violate disclosure and other policies or "whose activities clearly demonstrate an intent to threaten research security and integrity" with federal law enforcement, DHS, & Dept. of State. Agency heads may provide notice to other federal funding institutions in cases "where significant concerns have arisen, but a final determination has not yet been made." Funding agencies will include grant terms/conditions that allow for information sharing. 	<ul style="list-style-type: none"> Investigation: Research organizations should develop mechanisms to identify incomplete/inaccurate disclosures or policy violations, including documenting and reporting violations to authorities, including law enforcement where appropriate. Employment Agreements: Research organizations should include provisions in employment agreements that promote research security/integrity, including: <ul style="list-style-type: none"> Expectations regarding conducting/reporting activities outside of the employment period (e.g., summers for faculty with 9-month appointments) Expectations re. security training/policy adherence; Permit organizations to take effective action against violators. Consequences: <ul style="list-style-type: none"> Ensure appropriate penalties for violations of laws, agency standards, ethical standards and organizational policies, including the replacement on grant/contract, termination of grant funding, probation, revocation of tenure, termination, expulsion, civil & criminal penalties. Information Sharing: To extent consistent with law, research organizations should share information about violators with funding agencies and otherwise as required by law. 	<ul style="list-style-type: none"> Consequences for Violations: Federal funding agency may reject applications for R&D awards for violation of law or agency terms/conditions including disclosure requirements. "If covered individual "knowingly fails" to disclosure required information federal agency may: <ul style="list-style-type: none"> Reject application Suspend/terminate R&D award to individual or entity Temporarily or permanently discontinue any or all funding from agency for individual/entity Temporarily or permanently suspend/sebar individual/entity; refer matter to appropriate IG for investigation; Place individual/entity in federal awardee performance and integrity information system for noncompliance to alter other agencies. Take other action as authorized by law. Restrictions on Actions Against Entities: Action may only be taken against entities if: <ul style="list-style-type: none"> entity did not make employed covered individual aware of disclosure and certification requirements; and entity knew covered individual failed to disclosure required information and did not take steps to remedy nondisclosure before application was submitted; or head of research agency determines entity is owner/controlled/substantially influenced by covered individual and individual knowingly failed to disclose required information. Process: Federal funding agency must provide notice to individual/entity prior to enforcement action and provide opportunity and process to contest proposed action. 	Policy violations handled per agency processes.	Polices violations handled per agency processes.	The potential consequences set forth in NSM-33 and the JCORE Recommendations for non-disclosure are much broader than those contained in NDAAs 2021. Further, NDAAs 2021 contains very specific parameters for holding an entity responsible non-disclosures by a covered individual.	
Outreach & Awareness	<ul style="list-style-type: none"> OSTP, DNI and agency heads shall engage with US R&D Enterprise to increase awareness of risks to research security and integrity and policies/measures to mitigate risks. This include promulgations of guidelines for research institutions to mitigate risks to research security and integrity. Due Date: None 	Research organizations should partner with local FBI field offices to strengthen research security program and protect research organizations.	No requirements.	No requirements.	Research organizations should work with faculty and other staff to make sure that all applications, progress reports and JIT submissions include accurate and complete disclosures.		
Participation in FGSTP	<ul style="list-style-type: none"> Federal funding agencies shall establish (or clarify existing) policies that prohibit federal personnel who are also participants in U.S. R&D enterprise from participating in FGSTP. Agency heads may implement policies to extend this prohibition to some/all agency contractor personnel. Due Date: 1/14/22 	Research institutions should assist researchers who are considering participation in FGSTP by helping them with review of contracts and understanding their commitments and implications of those commitments.	No specific requirements.	See definition of Current and Pending Support	See definition of Other Support	Appears that there will be a federal-agency wide ban on participation in FGSTP. May potentially apply to researchers who have part-time appointments with federal agencies.	

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Security Program(s)	<ul style="list-style-type: none"> Guidelines for research institutions to mitigate risks to research security/integrity to be promulgated by OSTP, et. al. See Awareness Outreach. <u>Due Date:</u> None Research institutions that receive >\$50 million/year in federal science and engineering support must certify to funding agency that institution has established and operates research security program. <u>Due Date:</u> 1/14/22. Elements include: <ul style="list-style-type: none"> Cyber security, foreign travel, insider threat awareness/identification, & export control training. Agencies may have additional requirements for institutions with R&D in "critical and emerging technology areas" with implications for national and economic security. 	<ul style="list-style-type: none"> Research organization leadership should demonstrate and communicate importance of research security. Research organizations should have written research security implementation plan and designate chief research security officer or equivalent to oversee research security mgmt. Program should be comprehensive, including development of risk profile and has elements of cyber security, foreign travel security, insider threat awareness and education, and export control training. Depending on risk profile may also include robust cyber-security access and device registration protocols, hardware encryption and use of commercial threat mgt and compliance solution in internal due diligence. Research organization should estb. cross-organizational research security and integrity working groups and tasks forces to develop and implement research security policies/processes. 	No requirements.	No requirements.	No requirements.	<ul style="list-style-type: none"> NSM-33 requires research security program for institutions with >\$50million/year in federal science and engineering funding. JCORE Recommendations have no dollar threshold for program recommendation. All JCORE recommendations are supposed to be applied in a risk-based manner, but there is no specific risk stratification for each recommendation (e.g., certain recommendations apply only to classified or controlled research). JCORE Recommendations include recommendation of research security officer. 	
Vetting Foreign Students/Researchers/Travel, etc.	<ul style="list-style-type: none"> Secretary of State (SOS) and DHS shall ensure vetting process for foreign students/researchers "reflect the changing nature of the risks to U.S. R&D." SOS shall ensure consular officials can collect and consider the following information re. visa applicants: employment/employment history; sources of financial support, education history (institutes, degrees, research advisors), current/prior R&D affiliations/projects; FGTP participation/recruitment; program of study/research; facility/location of work. <u>Due Date:</u> None Relevant institutions will need to report information detailed above in SEVIS and provide SEVIS updates annually, or more frequently, when appropriate. <u>Due Date:</u> By 4/14/21, SOS must assess SEVIS system to determine what updates are necessary to ensure this reporting. By 7/14/21, SOS must provide an implementation plan to the Assist. to the President for National Security Affairs. DHS & SOS will assess feasibility and utility of including foregoing information in a searchable/centralized database, including flagging of connection to entities listed in Dept. of Commerce's Entity List. <u>Due Date:</u> 1/14/22 	SEVIS Related Requirements: <ul style="list-style-type: none"> Research organizations should ensure foreign student and foreign researcher information in SEVIS meets all requirements and is kept updated. Research organizations should ensure that foreign students/researchers understand disclosure requirements and adhere to disclosure processes. Failure to comply may lead to declassification, revocation of funding and loss of immigration status. Foreign Travel Review: <ul style="list-style-type: none"> Research organizations should estb. risk-based security process for reviewing foreign travel for export compliance, software use restrictions and other security concerns. Applies to researchers & administrators. Possible program elements include notification of foreign travel; secure loaner laptops/phones; cybersecurity protections for equipment used abroad; policies re. safeguarding of research information; and security briefings. Hosting Foreign Visitors: <ul style="list-style-type: none"> Research organizations should estb. processes for vetting and hosting foreign visitors to mitigate research security risks including alerting organization officials of visitors (e.g., export control office); require justification of research value of long-term visitors; required training for visitors on research security and ethical conduct of research; screening against restricted/denied parties; measures to prevent unauthorized information gathering. Data Security: <ul style="list-style-type: none"> Research organizations should implement data and cybersecurity measures and NIST Cybersecurity Framework may be useful in this regard. 	N/A	N/A	N/A	<ul style="list-style-type: none"> NSM-33 has detailed requirements about information that should be collected and requires DHS to ensure SEVIS system can collect information. 	
Section 117	Sec. of Dept. of Education (DOEd) will continue to promote balance between academic freedom and national security by promoting financial transparency of foreign funding sources and IHES via disclosures collected under Sec. 117. DOEd will continue to provide updates and clear public guidance on compliance with Sec. 117 and ensure information disclosed is made publicly available in accessible/useable format. <u>Due Date:</u> None	Research organizations should ensure compliance with Section 117 requirements.	No requirements.	No requirements.	No requirements.	NSM-33 spells out requirements for DOEd v. requirements for research organizations in JCORE Recommendations.	

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Training	<p>•Director of National Intelligence with agencies heads will develop information and intelligence products related to research security that can be provided to research institutions and others. Materials will include counterintelligence awareness training. <u>Due Date:</u> None</p> <p>•Federal agencies will develop initial and annual refresher training for federal agency personnel conducting R&D activities or participating in process of allocating federal R&D funding re. research security. <u>Due Date:</u> None</p> <p>•Research institutions research security programs should include export control training as an element. Due Date 1/14/22</p>	<p>•Research organizations should offer Research Ethics & Compliance (RECR) training to all researchers, including new students, visiting scholars, employees and affiliates regardless of funding.</p> <p>•Research organizations should ensure that all organization members are aware of circumstances and behaviors that pose research security risks, including:</p> <ul style="list-style-type: none"> *specific common provisions of FGSTP contracts *obligations to conduct R&D activities for other entities without knowledge/permission of home institution *foreign travel related to R&D activities, particularly when paid for by foreign entities, without justification regarding benefits *extended travel that is inconsistent with organizational obligations *collaborations with researcher on consolidated screening list *gifts with terms/conditions. 	<p>•NDAA 2021 requires entities to make covered individuals aware of their disclosure and certification requirements.</p>	N/A	N/A	<p>•NDAA 2021 has very defined training requirements for entities.</p> <p>•NSM-33 training requirements focus on federal agencies.</p> <p>•JCOPE Recommendations have very broad training requirements for research organizations.</p>	
Access to Government Research Facilities	<p>•Agency heads must have processes for controlling/tracking physical access to government research facilities including processes for vetting and securely hosting foreign visitors and evaluating research partnerships/contracts with outside entities. <u>Due Date:</u> None</p>	N/A	N/A	N/A	N/A	N/A	
Evaluation of Research Partnerships	N/A	<p>•Research organizations should establish a centralized review and approval process for evaluating formal research partnerships/contracts with outside entities for research security/integrity risks.</p> <p>•Consider affiliations/ownership; value of IP; planned research activities; information sharing and publication rights; personnel exchanges; export control considerations; funding; contract terms.</p>	N/A	N/A	N/A	N/A	