Annual Federal Agency Research Security Training Requirements

Background

National Security Presidential Memo 33 (NSPM33) was issued in January 2021. The memo directs agencies to focus on improving research security in several areas, including research security programs for research institutions.

The National Science and Technology Council of the Office of Science and Technology Policy (OSTP) released guidance for Implementing NSPM33 on January 4, 2022. The document provides agencies with guidance on implementing research training programs.

The Chips and Science Act is legislation signed into law in August 2022. The legislation includes authorization for funding in semiconductors. In addition, the act also has many research security provisions, including training requirements.

Forms

Covered Individuals Form

Overview

Federal Agencies will begin requiring research security training by all "Covered Individuals" listed in a proposal application. The **Department of Energy** implemented this requirement in **May 2025**. **National Science Foundation** requires this training for proposals submitted after **October 10, 2025.** The **U.S. Department of Agriculture** implemented this requirement in **December 2025**. All federal funding agencies are required to implement training requirements, and we can expect similar guidance for other agencies to be shared in the coming months.

Why is Training Required?

The United States Government provides significant support for basic and applied research to a variety of research institutions and programs. Some foreign governments have demonstrated an increased threat to the open and collaborative nature of the United States R&D Enterprise. Therefore, the federal government continues to take steps to protect its investment in R&D. As a result of that effort, federal agencies have been directed to require covered individuals to take an annual training on research security prior to submitting applications for funding.

Who must take the training?

A "Covered Individual" is defined as anyone who contributes in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a research and development award from a Federal research agency; and is designated as a covered individual by the Federal Research Agency.

Sections

I. At Proposal

SECTION I. AT PROPOSAL

Procedure

Covered Individuals (Senior/Key Personnel) that are MU personnel:

(1) Complete the "Research Security Training Combined" course in CITI prior to the submission of a proposal.

(2) If the Covered Individual is unable to access the CITI training module, they should contact grantsdc@missouri.edu to get access to an alternative training module located in eCompliance prior to the submission of the proposal.

Covered Individuals (Senior/Key Personnel) that are non-MU personnel:

(1) If the non-MU Covered Individual is part of a subcontract, their institution should confirm, via the Subcontract Commitment Form, that the Covered Individuals from their institution have completed Research Security Training within the last year.

(2) If the Covered Individual will not be part of a subcontract, they should contact grantsdc@missouri.edu to get access to an alternative training module located in eCompliance.

Departmental Research Administrator (DRA) – At proposal, the DRA will:

(1) Work with the PI to complete the Covered Individual Form.

(2) Verify that all MU Covered Individuals have completed Research Security Training through eCompliance.

(3) If there are non-MU Covered Individuals on the proposal, confirm the Subrecipient has checked the box that they confirm that their Covered Individuals have completed the Research Security Training requirement.

If the subrecipient indicates that their Covered Individuals have not completed the Research Security Training requirement, they should contact grantsdc@missouri.edu to get access to an alternative training module located in eCompliance.

(4) Submit to SPA the Covered Individual Form, eCompliance documentation showing all Covered Individuals and the date of their completed research training, and Subcontract Commitment Form(s) (if applicable) with the grant application and ePSRS.

SPA – At proposal, the SGCA will:

(1) Review the Covered Individual Form for completeness and accuracy compared to the proposal application forms.

(2) Review the documentation submitted by the DRA verifying that all MU Covered Individuals listed on the Covered Individuals form have completed Research Security Training within the last 12 months.

    If an MU Covered Individual has not completed training, the SGCA should immediately alert the PI and DRA to have that person complete the training.

SECTION II. AT AWARD

If there are additional Covered Individuals added to the project after proposal, the Principal Investigator (PI) needs to ensure that individual(s) complete Research Security Training.

No additional steps are needed to process the award for this certification.

SECTION III. DURING THE PROJECT

All Covered Individuals must complete training annually.