



## **Research Security and Other Support Training Policy – Shepherd University**

### **1. Purpose & Scope**

#### **1.1 Purpose**

The purpose of this policy is to ensure that all relevant Shepherd University personnel engaged in federally funded research are aware of and trained in their obligations regarding disclosure, foreign engagements, conflict of interest/commitment, export controls, cybersecurity, foreign interference risk, and responsible use of funds. It supports the institution’s compliance with [NIH NOT-OD-25-133](#) and [NSF Important Notice No. 149](#) (and related statutes) and fosters a culture of research security.

#### **1.2 Scope**

This policy applies to all employees, contractors, visiting scholars, students, or other individuals who are or may become senior/key personnel (or “covered individuals”) on NIH, NSF, or other federally funded research proposals or awards. It also applies to authorized organizational representatives (AORs) and institutional research compliance personnel. Unless otherwise expressly stated, this policy also applies to any federally funded research performed under SERC.

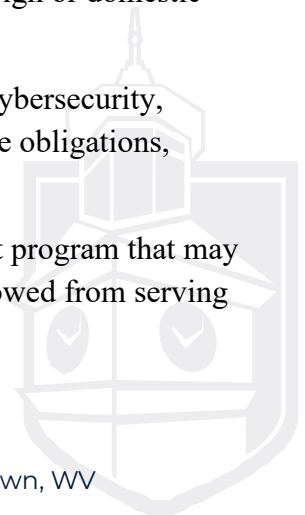
### **2. Definitions**

*Senior/Key Personnel/Covered Individual.* As defined by the sponsoring agency (e.g. NIH’s definition for NOT-OD-25-133, NSF’s definition under Important Notice 149) — individuals who are responsible for the scientific development or execution of a project in a substantive, measurable way.

*Other Support.* All financial resources (past, present, or pending) that support a researcher’s research endeavors (beyond what is reported in the proposal) — including foreign or domestic grants, contracts, gifts, in-kind contributions, or institutional support.

*Research Security Training (RST).* A training module or program addressing cybersecurity, foreign interference, international collaboration, proper use of funds, disclosure obligations, conflict of commitment/interest, and related topics.

*Malign Foreign Talent Recruitment Program (MFTRP).* A foreign recruitment program that may pose a risk of undue foreign influence; individuals participating may be disallowed from serving as senior/key personnel under NSF policy.



*Authorized Organizational Representative (AOR)*. A person authorized to sign proposals and certify institutional compliance with sponsor terms.

### 3. Roles and Responsibilities

<u>Role</u>	<u>Responsibilities</u>
RIO	Convene annual policy review committee as detailed in Research Integrity Policy for codifying annual updates as needed.
Senior/Key Personnel / Covered Individuals	Complete required training within time windows; maintain proof; make requisite certifications; comply with disclosure obligations
Authorized Organizational Representative (AOR)	Certify training completion on proposals; ensure institutional compliance
OSP	Administer training program, maintain records and tracking compliance, issue reminders, audit compliance, integrate policy changes from NSF, NIH, and other agencies, and update training content.
Department Heads / PIs	Ensure personnel under their supervision are aware of and complete training when necessary

### 4. Training Delivery & Tracking

Training will be delivered via:

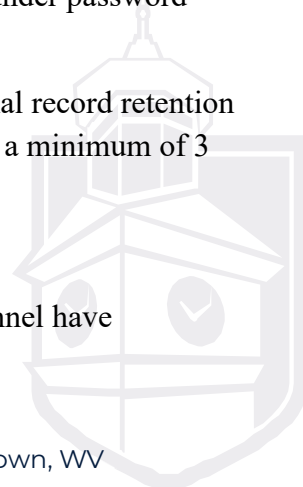
- The SECURE Center’s RST modules (condensed or full) as accepted resource [NSF - National Science Foundation](#) provided on SU’s learning management system (LMS), currently Brightspace.
- If the institutional LMS changes, the RST modules will be updated to the new LMS at least 30 calendar days prior to the institutional RST completion due date.

The institution must maintain a record of completion (e.g. certificate, timestamp, personnel name, module version) for each individual. These records will be maintained both on the LMS and in the OSP shared drive, accessible by OSP staff and Finance office and under password protection.

The training records should be retained for a period consistent with institutional record retention policies, and at least long enough to respond to audits or sponsor requests, for a minimum of 3 years from the ending date of the sponsored research activity.

#### 4.1 Certification & Proposal Submission

When a proposal is submitted, the AOR must certify that all senior/key personnel have completed the required training within 12 months.



Senior/key personnel must provide proof of training (e.g. certificate) that covers the submission date.

Personnel added after proposal submission must complete training before being formally added to the award or project - subject to sponsor rules.

#### **4.2 Non-Compliance & Enforcement**

Those charged with completing the training should complete the training within 2 weeks of the annual training alert. At the 2-week mark from the reminder date, a reminder will be sent including that person's direct supervisor (Director or Dean). At the 4-week mark from the reminder date, a reminder will be sent including that person's senior supervisor (VP or Provost). At the 6-week mark from the reminder date, steps will be taken to remove the noncompliant personnel member from the funded project team. If the personnel member is not currently committed to a funded project, they will be placed on an internal probationary list and excluded from future applications until the training is completed and documented with the OSP.

Failure to complete required training on schedule may result in ineligibility to serve as senior/key personnel on proposals or awards.

### **5. Training Requirements & Schedule**

#### **5.1 NIH / NOT-OD-25-133 — Other Support Disclosure Training**

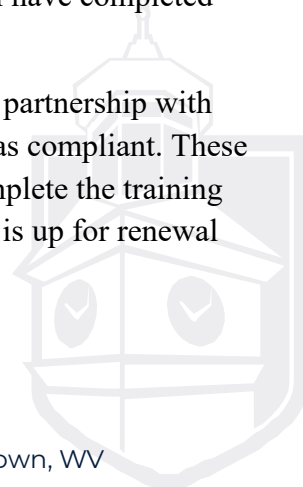
Effective October 1, 2025, all senior/key personnel must complete training regarding Other Support disclosure. [NIH OD 25-133](#). Other Support Disclosure applies to 1) Existing awards with RPPRs due on or after 10/1/2025 and 2) New proposal applications submitted on or after 10/1/2025. Training must be completed at least once every 12 months (or as required by new NIH guidance).

#### **5.2 NSF / Important Notice No. 149 — Research Security Training**

Effective October 10, 2025, all senior/key personnel must certify that they have completed research security training meeting NSF's expectations within the prior 12 months. [NSF Important Notice No.149](#).

The AOR must certify on all submitted proposals that all senior/key personnel have completed this training.

SU has adopted the SECURE Center's condensed RST modules developed in partnership with NSF, NIH, DOE, and DOD; those modules are recognized by those agencies as compliant. These modules are available on SU's LMS, Brightspace. Individuals required to complete the training per each agency will receive a notice facilitated by the OSP that their training is up for renewal and that the RST training has been added to their courses on Brightspace.



The training addresses:

- Cybersecurity and IT safeguards
- International collaboration, foreign travel, foreign appointments
- Foreign interference and undue influence risks
- Disclosure obligations, conflicts of commitment/interest
- Proper use of funds

The frequency of renewal is annually (or more frequently, if institutional policy demands) to ensure currency.

### **5.3 Combined or Cross-Agency Recognition**

SU has adopted consolidated training via the condensed RST modules so that a single completed module satisfies both NIH Other Support and NSF research security training obligations ([NIH Other Support](#)).

The institution should monitor evolving federal guidance (e.g. NIH's rescindment of certain research security policies) to update requirements accordingly.

## **6. Related Obligations & Policy Integration**

### **6.1 Other Support Disclosure Policy**

The institution must maintain a formal, written policy on Other Support disclosure, with clear expectations, procedures, and sanctions for non-disclosure, per NIH requirements.

### **6.2 Recordkeeping & Documentation**

In line with NSF Important Notice No. 149, the institution must maintain supporting documentation (e.g. contracts, agreements, foreign appointments, foreign talent recruitment program participation) related to foreign engagement and “other support” disclosures.

These records must be available for review by NSF or relevant agencies upon request.

### **6.3 Foreign Talent Recruitment Program (MFTRP) Certification (NSF)**

As required by NSF, individuals participating in a Malign Foreign Talent Recruitment Program may be disallowed from senior/key personnel roles.

Senior/key personnel must certify non-participation in MFTRP when required by sponsor proposals.

## **7. Referenced Policies**

[NIH Other Support](#)

[NIH NOT-OD-25-133](#)

[NSF Important Notice No. 149](#)

