

To: Researchers on Federally-Funded Projects

From: Marcia L. Smith, Associate Vice Chancellor for Research Administration

Date: October 7, 2025

Subject: Review of Federal Training Requirements for PIs and Senior Key Personnel - “Research Security” and “Disclosure of Other Support”

In accordance with provisions of the CHIPS and Science Act, federal agencies are implementing research security training requirements for Grantee Institutions and Senior Key Personnel (SKP) on federally-funded awards. Below is a summary of current and upcoming training requirements by agency.

If you have questions about the NIH Other Support Training requirement, please contact Marcia Smith at marcia.smith@research.ucla.edu.

If you have questions about Research Security Training, please contact UCLA Research Security at Research.Security@research.ucla.edu.

National Science Foundation (NSF)

Requirement:

All Senior Key Personnel (SKP) must complete **Research Security Training** within **12 months before the submission of proposals**.

- Individual and institutional certifications are required.
- Proposals **cannot be submitted** until all required training is completed.

Subawardees:

Subrecipient institutions must certify to UCLA that their SKP have completed the training.

Effective Date:

Applies to proposals submitted **on or after October 10, 2025**.

Applicability:

Applies to all SKP named in an NSF proposal and/or on an NSF award. Senior/key personnel include the individuals who contribute in a substantive, meaningful way to the scientific development or execution of the proposed project. This includes the Principal Investigator (PI) and/or Co-PI(s). SKP may

also include Faculty Associates, an individual considered to be faculty equivalent or who holds an appointment as a faculty member at another institution, and who will participate in the project being supported.

Training Details:

- UCOP-developed Research Security Training (approx. 40 minutes) is available via CITI. Use this [Job Aid](#) to access the training.
- NSF [Consolidated Research Security Training Module](#) (approx. 1 hour) is available on the [NSF SECURE Center site](#).

Frequency:

Annual training and certification will be required. NSF will provide further guidance on the annual certification process.

More Information:

See NSF Important Notice [No. 149](#)

National Institutes of Health (NIH)**Requirement:**

Training on the NIH requirements for disclosing current and pending support must be completed by all Senior Key Personnel **before submitting Other Support (OS) disclosures**, including:

- Just-in-Time (JIT) submissions
- Research Performance Progress Reports (RPPRs)
- Grant applications requiring OS disclosures.

Effective Date:

Applies starting **October 1, 2025**.

Applicability:

All individuals identified as [Senior Key Personnel](#).

SKP include the PD/PI and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they receive salary or compensation under the grant. SKP must devote measurable effort to the project. "Zero percent" effort or "as needed" are not acceptable levels of involvement for those designated as **Senior/Key Personnel**.

Training Options at UCLA:

This requirement can be satisfied by completion of one of the "Research Security"

or “Ethics and Compliance” training requirements already in place. If SKP have completed any of the options below, please provide the name and date of the completed training. SKP must complete **one** of the following trainings before responding to an NIH requirement for reporting “Other Support”:

- UCOP-developed “Research Security Training” (approx. 40 minutes) is available via [CITI](#) and satisfies both the Research Security and the Other Support training requirement.
- NSF [Consolidated Research Security Training Module](#) (approx. 1 hour) available on the [NSF SECURE Center site](#) may be used to satisfy the NIH Other Support training requirement.
- The “[UC Ethics and Compliance Briefing for Researchers](#)” (approx. 1 hour) also satisfies the Other Support training requirement.
 - This training is required for all UC extramurally funded researchers, including faculty and staff researchers, as well as postdoctoral scholars. If SKP have already completed this training, please provide the name and date of completion for each SKP.

Implications:

JIT, RPPRs, and grant applications **cannot be submitted** until training is completed by all named SKP.

Frequency:

Ongoing; NIH may incorporate this into future annual Research Security Training requirements.

More information:

See NIH Notice [NOT-OD-25-133](#).

Department of Energy (DOE)**Requirement:**

All “[Covered Individuals](#)” must complete **Research Security Training** within **12 months prior to proposal submission**.

- Individual and institutional certifications are required.
- Proposals **cannot be submitted** until training is completed.

Subawardees:

Subrecipient institutions must certify to UCLA that their SKP have completed the training.

Effective Date:

Applies to proposals submitted **on or after May 1, 2025**.

Applicability:

All Covered Individuals listed in DOE proposals.

“Covered Individual” is an individual who contributes in a substantive, meaningful way to the development or execution of the scope of work of a project. This includes the principal investigator (PI); project director (PD); co-principal investigator (Co-PI); co-project director (Co-PD); or project manager. Covered individuals may also include roles specified in the Notice of Funding Opportunity (NOFO) and/or terms and conditions of the award.

Training Details:

- UCOP-developed Research Security Training (approx. 40 minutes) is available via CITI. Use this [Job Aid](#) to access the training.
- NSF [Consolidated Research Security Training Module](#) (approx. 1 hour) is available on the [NSF SECURE Center site](#).

Frequency:

Annual training and certification required. DOE will provide additional guidance.

More Information:

See DOE [FAL 2025-02](#) and VCR Wakamoto’s May 2025 [communication](#). [UC-EC-23-0625 Mandatory Training.pdf](#)