

---

# OFFICE OF CONTRACT & GRANT ADMINISTRATION UPDATES

DECEMBER 2024

RESEARCH ADMINISTRATION FORUM

TRACEY FRASER, SENIOR DIRECTOR, OCGA

**UCLA** Research  
Administration

---

# RESEARCH SECURITY REQUIREMENTS: IMPACT ON CONTRACTS & GRANTS



**DIGITAL PERSISTENT IDENTIFIER**  
ORCID iD



**COMMON FORMS**  
Standardizing Disclosure Requirements



**OTHER UPDATES**  
SciENCv  
Agency Specific Risk Assessments  
Research Security Training



**AGREEMENT TERMS**  
Potentially challenging T&C

# WHAT IS RESEARCH SECURITY?

**Safeguarding** the research enterprise **against the misappropriation of research and development** to the detriment of national or economic security, related violations of research integrity, and foreign government interference

---

NSPM 33 [definition](#)

---

# MANDATORY DIGITAL PERSISTENT IDENTIFIER (DPI)

Preferred DPI is ORCID iD, a free, life-long, unique, 16-digit identifier



## ORCID ID

Federal Sponsors currently strongly recommend ORCID iD  
Mandatory for at least NIH & NSF from May 2025



## BENEFITS INCLUDE

Reliably; connects a researcher with their works, awards, and affiliations

Alleviates mistaken identity

Researcher owns and controls their record, managing what information is connected and how it is shared

Saves the researcher time – “enter once, reuse often”

Improves recognition for the researcher and their research and increases discoverability of an individual's research outputs



## REGISTER NOW TO PREVENT DELAYS

Please encourage PIs to register now to prevent potential delays with proposal submissions when it does become mandatory

**COMMON FORMS  
INCLUDING  
BIOSKETCH AND  
CURRENT AND  
PENDING (OTHER)  
SUPPORT WILL  
REQUIRE A DPI**

**NSPM 33**

# COMMON DISCLOSURE FORMS

## NSF / NASA

Already Required

## NIH

Required from May 25, 2025

Until then use [NIH Other](#)

[Support](#) and [Biosketch](#) forms

## DOD/DOE

Implementing soon (May 1<sup>st</sup> 2025?)

Check NOFOs now

Resources:

[Biographical Sketch](#)

[Current and Pending \(Other\) Support Common Form](#)

[Disclosure Table \(May 2024\)](#)

---

# DISCLOSURE REMINDERS

## Covered Individuals

- Definition may vary depending on the sponsor / NOFO (watch out for [NASA](#) and [DOE](#))
- Occasionally expanded definition of could include graduate students, postdocs, maybe even consultants

## Bio-sketch

- Must include academic, professional, or institutional appointments and positions, whether or not remuneration is received, and, whether full-time, part-time, or voluntary ([NSPM 33 Definitions](#))
- Current or pending participation in, or applications to, programs sponsored by foreign governments, instrumentalities, or entities, including foreign government sponsored talent recruitment programs

---

## COMMON FORM BIOSKETCH CERTIFICATION

*I certify that the information provided is current, accurate, and complete. This includes but is not limited to information related to domestic and foreign appointments and positions.*

*I also certify that, at the time of submission, I am not a party to a [malign foreign talent recruitment program](#).*

*Misrepresentations and/or omissions may be subject to prosecution and liability pursuant to, but not limited to, 18 U.S.C. §§ 287, 1001, 1031 and 31 U.S.C. §§ 3729-3733 and 3802.*

*Signature:*

*Date:*

# DISCLOSURE REMINDERS: CURRENT & PENDING (OTHER) SUPPORT

Active and Pending Awards



## DO INCLUDE

- ✓ Pending proposals for funding supporting a PI's research endeavors, including proposals submitted through another entity
- ✓ Current and pending awards in support of research activities, including awards received through another entity or made directly to the individual
- ✓ Startup packages from organizations outside of UCLA
- ✓ Startup companies based on non-organization-licensed Intellectual Property
- ✓ Travel supported/paid by an entity other than UCLA to perform research with an associated time commitment
- ✓ Current and pending participation in, or applications to, programs sponsored by foreign government sponsored talent recruitment program
- ✓ Consulting activities where:
  - Activity will require the investigator to perform research, or
  - Activity does not involve performing research, but is related to the individual's research portfolio and may have the ability to impact funding, alter time or effort commitments, or otherwise impact scientific integrity, or
  - Contract requires the investigator to conceal or withhold confidential financial information or other ties between the investigator to the entity



## DO NOT INCLUDE

- ✗ Training awards
- ✗ Prizes
- ✗ Startup packages provided by UCLA

[Common Forms Disclosure Table](#) (May 2024)

---

## COMMON FORM CURRENT & PENDING (OTHER) SUPPORT CERTIFICATION

*I certify that the information provided is current, accurate, and complete. This includes, but is not limited to, information related to current, pending, and other support (both foreign and domestic) as defined in 42 U.S.C. §6605.*

*I also certify that, at the time of submission, I am not a party in a [malign foreign talent recruitment program](#).*

*Misrepresentations and/or omissions may be subject to prosecution and liability pursuant to, but not limited to, 18 U.S.C. §§ 287, 1001, 1031 and 31 U.S.C. §§ 3729-3733 and 3802.*

Signature:

Date:

---

## OTHER UPDATES

### SciENcv

- Mandatory now for NSF
- Mandatory for NIH from May 25, 2025
  - UCLA confirmed as a tester for SciENcv

### MFTRP Certs

- **Covered Individual Certs**
  - Already required for NSF, NASA and some incoming subawards
  - NIH from May 25, 2025
  - DOD / DOE , Others coming soon
  - An annual MFTRP certification will be required
    - Goal to move from a manual to an automated process in 2025
- **Institutional Certs**
  - Certify that information on MFTRPs has been made available to the covered individuals
  - During transition to mandatory research security (MFTRP) training for covered individuals, if an institutional cert is required, OCGA is providing MFTRP information to, and collecting additional certifications from, the covered individuals

---

## OTHER UPDATES: RESEARCH SECURITY TRAINING



### Why is research security training required?

Required by NSPM-33 'to safeguard our research ecosystem'

CHIPS & Science Act of 2022 codifies the requirement for research security training



### When will it be required?

Already included in some NOFOs / awards

Will become mandatory during 2025 for many Federal sponsors



### Who is required to take it?

Covered individuals listed on the application for a R&D award

(Remember: sponsors / NOFOs may have different definitions of covered individual)

Institution will certify annually that these individuals have completed research security training

---

## OTHER UPDATES: RESEARCH SECURITY TRAINING

Currently manual certifications, but move to a more formal process in 2025

From May 1, 2025, DOE will require verification that training has been completed by all covered individuals at proposal stage

- NSF hosted [training modules](#) (NSF,NIH, DOE and DOD co-funded)
  - Four sessions (each 60-minute)
- UCOP Research Security Training [Modules](#) (being updated to meet Federal requirements– updates available in the New Year)

## RESEARCH SECURITY RISK MITIGATION REVIEWS

Many Federal sponsors now use information included in the Biosketch and Current & Pending (Other) Support reports, as well as information from other sources, to assess if disclosures are complete and to flag associations, funding or collaborations that might increase the research security risk

Some sponsors have published their risk matrices including [NIH](#); [NSF](#); [DoD](#); [DOE](#)

In addition, in some circumstances, a [UCOP mandated](#) Internal Enhanced Review and Approval Process is required:

- Country of Concern (Qatar, Saudi Arabia, UAE, China, Iran, Russia & North Korea) AND emerging Technology
- Flag early to allow for extra review time

---

# AGREEMENT TERMS: POTENTIALLY CHALLENGING TERMS AND CONDITIONS

1

## Cybersecurity T&Cs

- CUI / FISMA / CMMC – requiring high security environment
- Data breach reporting
- Cybersecurity review deliverables

2

Citizenship restrictions – reporting/ approvals/ prohibitions

3

Far reaching confidentiality clauses / Right to publish / Approvals to publish / Fundamental research challenges

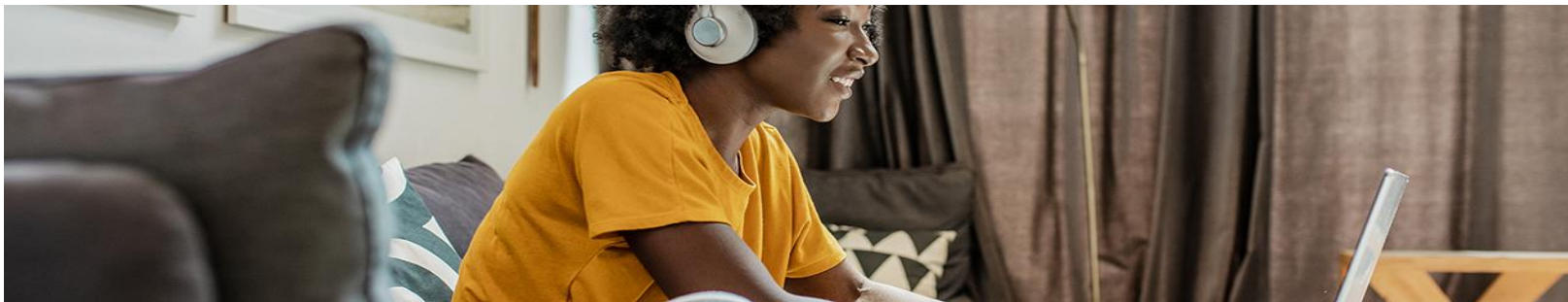
4

Reporting of covered individual personal international travel in advance of taking the travel (some Army grants)

# CLOSING THOUGHTS

Take extra care in listing a lot of individuals in proposals as Senior Key Personnel (SKP)

There will increasingly be extra administrative burden on SKP (covered individuals) including reporting, certifications, disclosures, prior approvals, research security training, etc.



## 2025 OCGA Monthly Training

### Preparing & Submitting a Proposal for OCGA Review

January 15, 2025

### S2S Grants Basics

February 19, 2025

### Preparing an NIH Multiproject Application in NIH ASSIST

March 19, 2025

### Budgets 101

April 16, 2024

### Completing the EPASS

May 21, 2025

### NSF Research.gov Basics

June 18, 2025

### Post-Submission/Pre-Award Requirements

July 16, 2025

### Award Processing

August 20, 2025

### S2S Grants Basics

September 17, 2025

### Requesting New and Amendment Subawards

October 15, 2025

### Completing the EPASS

November 19, 2025

[Register for OCGA Monthly Training](#)

*Separate registration for each session is required*