

**NATIONAL SCIENCE FOUNDATION
OFFICE OF THE DIRECTOR
ALEXANDRIA, VA 22314**

Important Notice No. 149

June 30, 2025

**IMPORTANT NOTICE TO THE PRESIDENTS OF UNIVERSITIES AND
COLLEGES AND HEADS OF OTHER NATIONAL SCIENCE
FOUNDATION Awardee Organizations**

SUBJECT: Updates to NSF Research Security Policies

The U.S. National Science Foundation (NSF) is committed to supporting the research community in safeguarding U.S. science and engineering through clear, actionable research security policies. In alignment with the CHIPS and Science Act of 2022 (P.L. 117-167) and National Security Presidential Memorandum-33 (NSPM-33), NSF has established a series of requirements to strengthen transparency and accountability across NSF-funded projects. In close partnership with NSF awardee organizations, these efforts are bearing fruit, with increased awareness of the risks, improved understanding of expectations, and a strengthened sense of shared responsibility, to name a few. But our work is not done. I request your continued partnership as NSF redoubles its efforts to advance research security.

In our ongoing work to ensure NSF-funded projects are free of malign foreign interference and misappropriation, NSF is taking the following steps. These policy updates were developed pursuant to Congressional mandates and Executive Orders and have been refined with extensive stakeholder input.

1. Research Security Assessment and Required Recipient Documentation – Effective October 1, 2025

NSF reserves the right to perform risk assessments of proposals and awards submitted to the Foundation using analytical tools to assess nondisclosures of required information from senior/key personnel, and establish other policies and procedures for identifying, communicating, and addressing security risks that may threaten the integrity of Foundation-supported research and development.

NSF proposers and recipients are required to maintain supporting documentation, including copies of contracts, grants, or any other agreements specific to foreign appointments, employment with a foreign institution, participation in a foreign talent recruitment program and other information reported as current and pending (other) support for all senior/key personnel that must be available to NSF upon request. Proposers and recipients are expected to review requested supporting documentation for compliance with NSF award terms and conditions.

2. Research Security Training – Effective: October 1, 2025

NSF requires research security training certifications from proposers and individuals identified as senior/key personnel by the proposer. Proposers may utilize any training that addresses cybersecurity, international collaboration, foreign interference, and rules for proper use of funds, disclosure, conflict of commitment, and conflict of interest.¹ NSF, in partnership with the National Institutes of Health (NIH), the Department of Energy (DOE) and the Department of Defense (DOD), have provided four online research security training (RST) modules as a resource to awardee organizations. Subsequently, the SECURE Center developed an updated and condensed version of the four modules. The condensed RST module is designed to meet the government-wide RST requirement in Section 10634 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19234). To that end, NSF, NIH, DOE, and DOD all recognize completion of the condensed module as compliant with their respective RST requirements.

Research Security Training Requirement for Federal Award Personnel: In accordance with Section 10634 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19234), each individual identified as a senior/key person must certify that they have completed the requisite research security training that meets the requirements specified in *Item 2 of Important Notice No. 149* within 12 months prior to proposal submission.

- a. *Certification Regarding Research Security Training for Federal Research Award Personnel:* In accordance with Section 10634 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19234), the Authorized Organizational Representative (AOR) must certify that all individuals identified as senior/key personnel have completed the requisite research security training that meets the requirements specified in *Item 2 of Important Notice No. 149* within 12 months prior to proposal submission.
- b. *Certification Regarding Responsible and Ethical Conduct of Research (RECR) (Applies to Institutions of Higher Education Only):* The AOR is required to complete a certification that the institution has a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduate students, postdoctoral scholars, faculty, and other senior/key personnel who will be supported by NSF to conduct research and that such training addresses mentor training and mentorship, training to raise awareness of potential research security threats, and Federal export control, disclosure, and reporting requirements.

¹ Pursuant to section 10634 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19234), NSF intends to develop training focused on foreign travel security for use by the community.

3. Malign Foreign Talent Recruitment Program Prohibition – In Effect

Individuals who are a current party to a Malign Foreign Talent Recruitment Program (MFTRP) are not eligible to serve as a senior/key person on an NSF proposal or on any NSF award made after May 20, 2024.

4. Malign Foreign Talent Recruitment Program Certification – In Effect

NSF requires MFTRP certifications from proposers and individuals identified as senior/key personnel.

a. *Pre-Award Certifications:*

- In accordance with Section 10632 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19232), the AOR must certify that all individuals identified as senior/key personnel have been made aware of and have complied with their responsibility under that section to certify that the individual is not a party to a malign foreign talent recruitment program.
- In accordance with Section 10632 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19232), each individual identified as a senior/key person must certify that they are not a party to a malign foreign talent recruitment program.

b. *Post-award Certification:* Individuals serving as a PI or co-PI on an active NSF award made on or after May 20, 2024, must certify annually via Research.gov to their participation or non-participation in an MFTRP.² Additional information regarding the annual certification process can be found at [nsf.gov/research-security](https://www.nsf.gov/research-security).

5. Foreign Financial Disclosure Reporting (FFDR) – In Effect

In accordance with Section 10339B, *Foreign Financial Support*, of the CHIPS and Science Act of 2022 (42 U.S.C. § 19040) each “recipient institution of higher education” **must annually report** all “current financial support, the value of which is \$50,000 or more³, including gifts⁴ and contracts⁵, **received directly or indirectly** from a foreign source” which is “associated with a foreign country of concern.”⁶

² NSF intends to expand the post-award annual MFTRP certification requirement to all senior/key personnel at a future date.

³ The \$50,000 reporting requirement is an aggregate threshold by source per reporting period.

⁴ For purposes of FFDR reporting, a gift means any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, license, special access, equipment time, samples, research data, or other item having monetary value. A gift also includes services as well as gifts of training, transportation, local travel, lodging, meals, research hours, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has occurred. A gift by definition is given without expectation of anything in return.

⁵ For purposes of FFDR reporting, a contract means a source of financial support that does not fall under the definition of a gift for the purposes of the FFDR.

⁶ Foreign countries of concern are not the same as Countries of Particular Concern. Countries of Particular Concern is a designation by the Secretary of State, which refers to countries that have engaged in or tolerated

- a. *Applicability:* This requirement applies only to direct recipients of NSF funding. The determination of a direct recipient of NSF funding is based on the entity receiving NSF awards through its own Unique Entity Identifier (UEI). Satellite, branch or regional campuses that are not direct recipients of NSF funding must report any financial support via the main campus of the institution of higher education (IHE). This does not include entities that receive subawards or individuals that are the beneficiaries of the award.

Per section 10339B(a) (42 U.S.C. § 19040(a)), the report also must include financial support received by “a foundation of the institution, and related entities such as any educational, cultural, or language entity.”⁷ Also, financial support received from or contracts with an “agent” of a foreign source associated with a foreign country of concern are reportable. NSF is aware that the stated purpose and/or function of some legal entities (as articulated in articles of incorporation, for example) is to serve as an intermediary⁸ for foreign source gifts to or contracts with an institution. Allowing foreign sources and institutions to avoid disclosure by using intermediaries to transfer funds and benefit would be contrary to the plain statutory language, context, and purpose of 42 U.S.C. § 19040. Therefore, foreign source financial support comprised of gifts to or contracts with an intermediary that benefit an institution is reportable.

Financial support is attributable to the country of citizenship, or if unknown, the principal residence for a foreign source who is a natural person, and the country of incorporation/establishment, or if unknown, the principal place of business, for a foreign source which is a legal entity.

- b. Tuition payments for a specific student(s) are excluded from the reporting requirement (e.g., parent payment for child/children or other relatives). However, if tuition payment is received from a foreign source in the form of a grant, scholarship, or other form of financial aid, the payment is reportable when the cumulative threshold is \$50,000 or more per foreign source. *Reporting Period and Record Retention Requirements:* The report will cover the reporting period from July 1, 2024,

“particularly severe violations of religious freedom” as outlined in the International Religious Freedom Act (IRFA) of 1998. Pursuant to Section 10638 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19232), for the purposes of this notice, the term “foreign country of concern” means the People's Republic of China, the Democratic People's Republic of Korea, the Russian Federation, the Islamic Republic of Iran, or any other country determined to be a country of concern by the Secretary of State.

⁷ NSF expects each IHE to coordinate with their related entities and expressly state, when completing its required annual report, which entities are included in that report.

⁸ NSF has expanded the definition of “intermediary” to include:

- i. an individual or entity other than an Institution of Higher Education that receives a gift from or enters into a contract with a foreign source and then passes part or all of the support from the gift or contract to the Institution of Higher Education, or
- ii. an individual or entity that sends financial support on behalf of a foreign source to an Institution of Higher Education.

through June 30, 2025. To provide sufficient time for finalization and submission of the requisite information, the FFDR reporting portal on Research.gov will open for report submissions September 1, 2025, and the report must be submitted by October 31, 2025. Subsequent years' reporting periods will run from July 1 of the previous year to June 30 of the reporting year. Negative reports are required to be submitted. The institution will maintain a copy of the relevant records subject to the disclosure requirement until the latest of –

- i. the date that is four years after the end date of the award;
 - ii. the date on which the agreement terminates; or
 - iii. the last day of any period that applicable State public record law requires a copy of such agreement to be maintained.
- c. *Copies of Contracts, Agreements, or Documentation:* Upon review of a submitted disclosure, NSF may request that copies be submitted of any contracts, agreements, or documentation of financial transactions associated with disclosures submitted under this section.
- d. *Award Term:* Each NSF award includes as part of the award general terms and conditions a term and condition that implements the annual reporting requirement specified in *Item 5 of NSF Important Notice No. 149*.
- e. *Public Release of FFDR Disclosures:* It is NSF's intention to make public the information provided or collected in the FFDR disclosures to the extent required or permitted under applicable Federal law. However, if an IHE considers the name and address of the foreign source, intermediary, or agent acting on behalf of a foreign source to be exempt from public disclosure under federal law, due to privacy, privilege, confidentiality or other interest, the IHE may request that NSF withhold the publication of those data elements. NSF anticipates that this will be a rare occurrence. A listing of the updated data elements for the 2024-2025 reporting period may be found [here](#).

6. Certification Regarding IHEs Hosting or Supporting Confucius Institutes^{9, 10} – Effective October 1, 2025

In accordance with Section 10339A of the CHIPS and Science Act of 2022 (42 U.S.C. § 19039), no NSF funds may be awarded to an IHE that maintains a contract or agreement between the institution and a Confucius Institute. The NSF Director, after

⁹ "Confucius Institute" means a cultural institute established as a partnership between a U.S institution of higher education and a Chinese institution of higher education to promote and teach Chinese language and culture that is funded, directly or indirectly, by the Government of the People's Republic of China.

¹⁰ This section does not apply to an IHE if that institution has fulfilled the requirements for a waiver from the Department of Defense as described under section 1062 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (10 U.S.C. § 2241 note).

consultation with the National Academies, may issue a waiver for an IHE that maintains such a contract or agreement if such contract includes clear provisions that:

- 1) protect academic freedom at the institution;
 - 2) prohibit the application of any foreign law on any campus of the institution;
 - 3) grant full managerial authority of the Confucius Institute to the institution, including full control over what is being taught, the activities carried out, the research awards that are made, and who is employed at the Confucius Institute; and
 - 4) prohibit co-location with the institution's Chinese language, history, and cultural programs and require separate promotional materials.
- a. *Waiver:* An IHE may submit a request for a waiver or a waiver renewal that includes a description of the Confucius Institute, including at a minimum how the contract or agreement provisions satisfy each of the four criteria above. Waiver requests must be sent to NSF at researchsecurity@nsf.gov.

NSF encourages consideration of the following reports by the National Academies of Sciences, Engineering, and Medicine in preparing waiver requests: *Confucius Institutes at U.S. Institutions of Higher Education: Waiver Criteria for the Department of Defense* and *Foreign-Funded Language and Culture Institutes at U.S. Institutions of Higher Education: Practices to Assess and Mitigate Risk*. An IHE not granted a waiver will be provided a written explanation of the reason(s) for the denial.

- b. *Certification Regarding IHEs Hosting or Supporting Confucius Institutes:* In compliance with Section 10339A of the CHIPS and Science Act of 2022 (42 U.S.C. § 19039), the AOR must certify that, absent a waiver granted by the NSF Director, the IHE does not maintain a contract or agreement between the institution and a Confucius Institute.

NSF cannot achieve its mission without the contributions and world-class talent of the U.S. research community. Science holds enormous promise for solving our most pressing challenges and it is through this lens that the importance of safeguarding research comes into focus. As stewards of precious public funding, we must ensure it is the American people who benefit from their investments and trust in us.

I thank you for your leadership in this effort.

Brian Stone
Chief of Staff, Performing the duties of the NSF Director