

 Research & Sponsored Programs UNIVERSITY OF DENVER	Office of Research and Sponsored Programs Policy Manual Research Security
	Policy Number: ORSP-32
Recommended By: Director of Sponsored Program Administration; SPARC Approved By: Senior Vice Provost for Research and Graduate Education	Effective Date: 10/1/2024

1. PURPOSE

Science, technology, and innovation have been integral to U.S. leadership in the world for many decades, supported by the strength of the U.S. research community. Today, the global strategic environment is characterized by fierce military and economic competition among many actors. This marks a significant change from the global environment 10 years ago. To address risks to research security, the US implemented NSPM33 and research security provisions of the CHIPS and Science Act to align with American values. NSPM-33 recognizes that the open and collaborative nature of the U.S. R&D enterprise underpins America’s science and technology leadership, economic competitiveness, and national security. We must preserve this open and collaborative environment to compete effectively. This includes prioritizing attracting global talent to the United States to conduct R&D.

Importantly, federal research agencies must implement research security policies that treat everyone equally under the law, without xenophobia, prejudice, or discrimination, a principle reinforced by the CHIPS and Science Act. The law also requires that research security activities be carried out that does not target, stigmatize, or discriminate against individuals based on race, ethnicity, or national origin.

As a standardized requirement, federal research agencies shall require covered institutions to certify that their research security programs include elements relating to (1) cybersecurity; (2) foreign travel security; (3) research security training; and (4) export control training, as appropriate.

2. DEFINITIONS

- (1) Classified information – The term “classified information” has the meaning given such term in Section 10339(b)(1) of the CHIPS and Science Act (42 U.S.C. 19038(b)(1)). 10
- (2) Covered individual – The term “covered individual” has the meaning given such term in Section 10638(1) of the CHIPS and Science Act (42 U.S.C. 19237(1)).
- (3) Covered institution – The term “covered institution” is defined in section (II) of this memorandum.
- (4) Federal research agency – The term “federal research agency” has the meaning given the term “Federal research agency” in Section 10002(10) of the CHIPS and Science Act (42 U.S.C. 18901(10)).
- (5) Foreign country of concern – The term “foreign country of concern” has the meaning given such term in Section 10638(2) of the CHIPS and Science Act (42 U.S.C. 19237(2)).
- (6) Institution of higher education – The term “institution of higher education” has the meaning given such

term in Section 101(a) of the Higher Education Act of 1965 (20 U.S.C. 1001(a)).

- (7) Non-covered institution – The term “non-covered institution” means a participant in the U.S. R&D enterprise that is not a covered institution.
- (8) Participants in the U.S. R&D enterprise – The term “participants in the U.S. R&D enterprise” has the meaning given the term “participants in the United States R&D enterprise” in section 2(a) of NSPM-33.
- (9) R&D award – The term “R&D award” has the meaning given the term “research and development award” in section 10002(25) of the CHIPS and Science Act (42 U.S.C. 18901(25)).
- (10) Research and development and R&D – The terms “research and development” and “R&D” have the meaning given such terms in 2 C.F.R. §200.1.
- (11) U.S. government-supported R&D – The term “U.S. government-supported R&D” has the meaning given the term “United States Government-supported R&D” in Section 2(b) of NSPM-33.

3. POLICY

- 3.1. Every Principal Investigator and co-Principal Investigator on internally or externally funded research grants/contracts are required to take online training through CITI in the areas below once every four years.
 - 3.1.1. Introduction to Research Security
 - 3.1.2. Risk Mitigation and Research Security
 - 3.1.3. Cybersecurity and Research Security
 - 3.1.4. International Collaboration
 - 3.1.5. International Travel
 - 3.1.6. Foreign Interference
 - 3.1.7. Federal Funding and Foreign Gifts and Contracts
 - 3.1.8. Disclosures and Transparency
 - 3.1.9. Export Control
- 3.2. Every Principal Investigator and co-Principal Investigator on internally or externally funded research grants/contracts are required to participate in an updated, annually scheduled training at the DU ORSP Research Policy Relay.
- 3.3. All University employees engaged in research, scholarship, and creative work projects will comply with the federal government's research security regulations.

4. PROCESS

- 4.1. Each year as Principle and co-Principal investigators complete their research conflict of interest disclosure, their CITI certificates will be verified for completion of the research security training outlined above. Those who have not completed the training in the last four years can submit their research conflict of interest disclosure once such training is complete.
- 4.2. The University will not open a fund for a new research grant or continuation without having a completed research conflict of interest disclosure.
- 4.3. Every five years, the Vice Provost for Research and the IT Security Officer send a letter to the General Counsel, Provost, and CFO certifying that the research security program is operating and has been audited to be compliant.

5. RESOURCES

- 5.1. Executive order July 2024 <https://www.whitehouse.gov/wp-content/uploads/2024/07/OSTP-RSP-Guidelines-Memo.pdf>