

Northwestern | RESEARCH

Research Security Training Plan SOP – Updated August 27, 2025

Research Security Training Requirements

The federal government is requiring research security training. This mandate stems from [President Trump's National Security Presidential Memo-33](#) (2021) and the [CHIPS and Science Act \(2022\)](#). The federal government requires that Northwestern certify that it has a Research Security program and one of the required elements is Research Security Training for all “covered individuals.” To meet the Research Security training requirement, “covered individuals” (i.e., Principal Investigators and Senior and Key Personnel) and anyone else mandated by a federal agency in a proposal or award are required to take Research Security training.

Rollout: The training was initially rolled out to covered personnel (PIs and senior and key personnel) on DOE awards in March 2025 and then to NSF in July 2025. In late August 2025, Northwestern rolled out the training for all covered personnel on any federal award since several other agencies (NIH, USDA) are requiring the training by October 2025.

Key personnel on active DOE awards: received a targeted email on March 25, 2025, letting them know that we are requiring completion of the research security training for DOE awardees by May 1, 2025. This training was assigned to them in myHR, and a 30-day reminder was scheduled for mid-April.

All key personnel on active federal awards or key personnel on submitted federal proposals: received an email on March 25, 2025, informing them of the research security training and that it will become required for them at a TBD date in 2025. They also received a link to the training in this email in the event they want to proactively take it.

Key personnel on active NSF awards: received a targeted email on July 14, 2025, letting them know that we are requiring completion of the research security training for NSF awardees by October 10, 2025. This training was assigned to them in myHR, with a 30-day reminder.

All remaining key personnel on any active awards: assigned the training in myHR circa late August and Early September 2025, with a 30-day reminder.

Training for Covered Individuals (Faculty who are PIs, Senior and Key Personnel):

Researchers have two training options: (1) a one-hour Northwestern-developed training meeting specific criterion (recommended) or (2) a four-hour course developed by the NSF. ***To reduce administrative burden, Northwestern's Research Security team has created the one-hour NU-training.*** For questions, please contact the [Export Controls & International Compliance](#) team.

- (1) Northwestern one hour training (recommended option):** This one-hour training course is designed to provide a comprehensive understanding of research security. The training is tailored to Northwestern and includes specific guidance, resources, and how to avoid missteps. The training focuses on mitigating risks associated with foreign interference, proper disclosure of research information, international travel & shipping, cyber threats, and more. Access the training in [here in myHRLearn](#). Participants will learn to:
1. Describe why research security is important for the U.S. Research and Development enterprise and

- what constitutes improper foreign interference and undue foreign influence.
2. Understand the importance of non-discrimination as a guiding principle of U.S. research security policy and the value of and challenges with international collaboration.
 3. Know why and how to disclose relationships and the proper use of funds.
 4. Identify, manage, and mitigate risk, particularly in the context of foreign talent programs.
 5. Understand responsible international travel practices and some export controls (shipping and OFAC sanctioned countries).
 6. Be familiar with intellectual property and data protection requirements and best practices, including basic cyber security.

The Northwestern training meets the federal government requirements to (1) provide covered individuals with explicit examples of behaviors that have resulted in a known improper or illegal transfer of U.S. government-supported R&D in the context of the research environment; and (2) communicate to covered individuals the importance of U.S. researcher participation in global discoveries, including attracting foreign talent to U.S. research institutions, as a core principle of maintaining international leadership and national security. It also meets the training requirements outlined in the CHIPS & Science Act, Sec. 10634.

- (2) NSF four hour training:** The U.S. National Science Foundation, in partnership with the National Institutes of Health, the Department of Energy and the Department of Defense, created research security training for the research community. This training provides recipients of federal research funding with information on risks and threats to the global research ecosystem — and the knowledge and tools necessary to protect against these risks. Access the training [here in myHR Learn](#) and get NU credit.

Responsible Parties

Vice President for Research and delegates (CROO and AVP)

The VPR and their delegates will provide strategic leadership to promote a culture of compliance including messaging the training requirement and supporting the enforcement efforts for non-compliance. The VPR will certify that Northwestern has a Research Security program that meets the requirements including the mandated Research Security training for covered individuals.

Authorized Official

The Northwestern Authorized Official or their delegate will certify at time of proposal or award acceptance that the covered individuals have completed the Research Security training.

Research Security Officer

The Export Controls & International Compliance (ECIC) Senior Director serves as the Research Security Officer. In this role, they are responsible for ensuring that training is updated as necessary, reviewing and reporting compliance metrics, and providing updates to senior leadership.

Deans and Associate Deans for Research

The department/school leadership will communicate the training requirement, review reports of who needs to complete the training, and support the enforcement efforts for non-compliance.

Training Manager

The Training Manager will create the training certification, course, and certificate in myHRLearn. The training team will create the training content, updates, and annual re-certification training in coordination with the ECIC team and Research Security Working Group.

Research IT (RIT) and Research Analytics: RIT will coordinate with Research Analytics, Human Resources, and ESHRS to create the system integration and data flow for myHRLearn training assignments. RIT will create and maintain a website for Sponsored Research to use to determine if someone has completed the training. Research Analytics will provide the CERES list of covered individuals to be assigned. The Research IT will send weekly report to the ECIC team.

Sponsored Research

Sponsored Research (SR) will verify covered individuals have taken the training prior to proposal submission and may remove the ability to be listed on proposals or awards for covered individuals that have not completed the training.

PI

The PI will coordinate with their team to encourage that all covered individuals complete the training prior to submitting a proposal. The PI will complete the training and refresher training, if mandated to do so.

Covered Individuals

Covered individuals will complete the training as required by federal agencies prior to applying for or receiving an award. Covered individuals will complete refresher training, if mandated to do so.

Research Administrators

Research Administrators (RAs) will review proposals and awards to see if there are research security training requirements. If so, RAs will work with the PI to ensure that all covered individuals listed in the proposal or award have completed research security training before the proposal is submitted to Sponsored Research.

Please contact the [Export Controls & International Compliance](#) (ECIC) team with any general questions regarding this training requirement. Contact the [Office for Research Training](#) team for MyHR Learn technical assistance.

Key Definitions

Covered individual: The term “covered individual” means an individual who (A) contributes in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a [research and development award](#) from a [Federal research agency](#); and (B) is designated as a [covered individual](#) by the [Federal research agency](#) concerned. (Reference: Section 10638(1) of CHIPS and Science Act and 42 U.S.C. 19237(1)).

Agency Guidance

- [DOE Announcement 7 October 2024](#)
- [America First Memorandum For USDA Arrangements And Research Security on July 8, 2025](#)
- [NSF Important Notice to Awardee Organizations, July 10, 2025](#)
- [NIH message on July 17, 2025. Additional reference on July 24, 2025](#)