Office of Research & Graduate Studies — Central Michigan University

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Purpose:

To outline the requirements for research security training mandated by the federal government and implemented by Central Michigan University (CMU).

Definitions:

- **Covered individual** – An individual who 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 is designated as a covered individual by the Federal Research agency concerned. This includes Principal Investigators (PIs), Co-Principal Investigators (Co-PIs), key senior personnel (KSP), and any additional personnel identified by a federal agency within a specific solicitation or award.

General Background Information:

Federal agencies are beginning to require research security training. This requirement originates from the National Security Presidential Memo-33 (2021) and the CHIPS and Science Act (2022). Because of this requirement, CMU is obligated to certify that it has a Research Security program, with a key component being a mandatory research security training for all covered individuals.

As detailed in an email from the Executive Director for Research and Innovation (EDRI) in May 2025, a new policy officially went into effect on Thursday, May 1, 2025 in which the Department of Energy (DOE) is requiring covered individuals and key personnel on DOE proposals (and potentially other researchers depending on the specific notice of funding opportunity) to complete a Research Security Training within the 12 months immediately preceding submission of a proposal to DOE. In addition, Research and Development (R&D) financial assistance agreements, including technical assistance to support R&D, that are issued on or after October 7, 2024, will carry the provision of completing the required training.

In addition, the Office of Sponsored Programs (OSP) will be requiring covered individuals on active federal awards, or recently submitted federal proposals, to complete research security training.

Narrative/Details:

1. Effective October 10, 2025, for new proposals, covered individuals (or anyone with an additional role identified in the solicitation) must complete research security training within the 12-month period prior to proposal submission.
2. For active awards, covered individuals must complete research security training if their award is modified to include this requirement. OSP will communicate with individuals if research security requirements are added to an active award.
3. In order to fulfill this requirement, OSP will require that covered individuals complete the Research Security Training available through CITI.
    a. Though it will not be required, OSP will also consider completion of the NSF Research Security training to fulfill this requirement.
4. Training completion will be tracked in Cayuse.