

Research Administration Practices (RAP) Sessions

COMPLIANCE: NAVIGATING NEW DEVELOPMENTS

October 9, 2025

Greg Moffatt, Chief Research Compliance Officer, VPR

Information provided in this learning session is based on information available as of the date of this presentation

Agenda

RAP Sessions: Targeted skills based educational offerings open to the Research Administration community at MIT. Information gathered and shared with attendees can be taken back to their desks and applied immediately.

- Welcome and Introductions
- Risk Mitigation for Investigators & Research Administrators
- Federal Mandates and MIT Compliance & Tools
 - Research Security Training Requirements
 - Financial Conflict of Interest & Conflict of Commitment
 - Disclosure Common Forms (Biographical, Other Support)
 - Malign Foreign Talent Recruitment Programs
 - Foreign Engagements & External Contracts
- Questions, Support & Resources

Introductions

Greg Moffatt

*Chief Research Compliance Officer,
Office of the VP for Research*

Please visit ...

Security, Integrity and Compliance
to learn more about each area,
including policies, online learning,
and contact information.

Security, Integrity and Compliance

MIT has a responsibility to ensure that its teaching and research environment fosters the generation of new knowledge and positive learning opportunities for students and preserves the integrity of its research enterprise and the public's trust.

Guidance, online training, and individual consultations are available on key security, integrity and compliance topics.

+ Export Control

+ Financial Conflicts of Interest and Conflicts of Commitment

+ Research Integrity

+ Research Security and Foreign Engagement

Related Offices and Committees

Within and beyond the VPR, other committees and offices ensure the safe, lawful and ethical operation of MIT's research activities in their respective areas of expertise.

- **Environment, Health & Safety Office:** Assists researchers in preparing proposal information on projects' environmental impact and compliance with federal, state, and local regulations.
- **Committee on Animal Care (CAC):** Oversees animal research and ensures compliance with federal, state, local and institutional regulations.
- **Committee on the Use of Humans as Experimental Subjects (COUHES):** Reviews research activities that involve human subjects, whether directly or indirectly, that will be conducted by investigators at or from MIT.
- **Committee on Assessment of Biohazards and Embryonic Stem Cell Research Oversight (CAB/ESCRO):** Reviews investigations involving potential health and safety problems associated with biological research.
- **Committee on Radiation Protection:** Reviews and approves all uses of ionizing and non-ionizing radiation sources through a system of authorization/registration programs, risk assessments, and monitoring programs managed by the Radiation Protection Program (RPP).

When engaging in any activity:

- Who are you working with?
- Giving a speech, for whom?
- Should you publish that paper as co-author?
- Did you seek advice before inviting visitors?



Why MIT engages internationally

“MIT is an American university, proudly so – but we would be gravely diminished without the students and scholars who join us from other nations.”

-- MIT President *Sally Kornbluth* (2025)

“Learning about the world, helping to solve the world’s greatest problems, and working with international collaborators who share our curiosity and commitment to rigorous scientific inquiry are core values for MIT.”

-- *A Global Strategy for MIT* (2017)

12%

International undergraduates

(AY2024)

40%

International graduate students

(AY2024)

60%

Postdocs appts held by foreign nationals

(AY2024)

47%

Internationally-born faculty

(AY2024)

70%

International ILP Members

(FY2024)

417 active awards from international sponsors in FY24, involving ~250 MIT PIs.

...while addressing global risks.

How should MIT engage globally, particularly with organizations and individuals in countries where political leaders are pursuing policies that pose security and related risks to the United States and/or that are irreconcilable with basic human rights and values?

Risks to U.S. Research Security and Integrity

Risks to the Integrity of the Research Enterprise

- Violations of responsible and ethical conduct of research
- Actions that undermine peer review and grant award processes

Risk to National Security

- Hidden diversions of research and/or resources that threaten U.S. leadership in emerging science and technology

Risk to Economic Security

- Hidden diversions of research and/or resources that weaken the innovation base and threaten economic competitiveness

Some Individuals and Foreign Governments Violate Core Principles of Integrity and Pose Risks to the Research Enterprise

OSTP “Enhancing the Security and Integrity of America’s Research Enterprise”

Risk Categories For ELEVATED RISK REVIEWS*

U.S. national security risk	What is the risk that MIT discoveries and inventions created in the engagement will be used against the national security interests of the US? What is the risk that foreign partners will gain access to unrelated MIT knowledge and technology that could be used against US national security interests?
Political, civil, and human rights risk	What is the risk that research outcomes will be used in ways that would infringe on political, civil, or human rights in the foreign country or elsewhere? What is the risk that the engagement will indirectly legitimize actions that are inconsistent with the values of the MIT community?
U.S. economic security risk	What is the risk that the collaboration will strengthen the competitiveness of the foreign entity relative to its U.S. rivals? Will the foreign entity benefit from unpublished know-how that MIT researchers have developed during previous U.S. government-funded research? Will the foreign entity benefit from access to MIT equipment or facilities that were funded by the U.S. government?
Risk to MIT community and core values	Does the engagement pose a risk to MIT's campus culture and values? Is there a risk that it will lead to discrimination or bias against MIT individuals or groups? Does it involve biometric, genetic, or other datasets whose provenance is inconsistent with MIT ethical or informed consent standards? Is there a risk of undue external interference in the direction of research or education?

Export control risk	Will the project comply with all relevant export control laws and regulations?
MIT IP risk	What is the risk that MIT will be unable to retain control of MIT-generated IP and know-how?
Data access/publication risk	Is there a risk that publication will be restricted? Are there restrictions on the use of data that MIT investigators will participate in generating?
Termination risk	Will MIT be able to terminate the engagement if necessary? Are the termination risks acceptable?
Misrepresentation risk	Are the individuals involved who they say they are? Where is the funding coming from and can we trace it to the source?
Reputational risk other than in other risk categories	Are the cooperating entities under investigation by the U.S. government? Are they on USG watch lists? Are individuals/entities involved that are controversial in-country or in the U.S.?
What are the risks of NOT accepting this engagement?	If we do not accept the engagement, what will be the implications for MIT's core academic mission, our competitiveness, the education of our students, the professional goals of our faculty?

* In addition to standard compliance reviews in regular Research Administration Services (MIT's OSP) and Office of Strategic Alliances, Transactions & Translation offices' review process (e.g., export controls, COI, etc.), travel safety and security, etc.

Research Security and Foreign Engagement

Discussion Guide on Research Security and Compliance

Use the [discussion guide for PIs](#) to talk with advisees and members of your research group about research security.

PIs should use this guide to review important research security and compliance topics with team members.

MIT Office of the Vice President for Research

Notes for Principal Investigators Discussing Research Security and Compliance with Research Groups and Advisees

This document is intended to provide guidance on research security and compliance topics to Principal Investigators (PIs) and their research groups.

Specifically, these notes are intended for PIs, in approaching and discussing research security and compliance with their research groups. Such discussions should foster ongoing, open discussion and transparency within the research group, and the word group refers to the group of individuals (including individual advisees) who are working on research projects under the PI's supervision.

This document may be used in a variety of ways, including as a starting point for discussion with research groups, as a reference for PIs, or as a resource for research groups.

Suggested Overview

- Our group works to carry out world-class research, and we want to ensure that our peers and the global public, as appropriate, have access to our research.
- At the same time, we need to be aware of the risks to our research and the support of our sponsors.
- What do we mean by **research security**? The research enterprise against the risk of the detriment of national or economic foreign government interference.
- What do we mean by **research integrity**? Honest and verifiable methods in producing research results with particular attention to following commonly accepted professional practices.
- Our group works hard and takes pride in our research. If we have a clear-eyed view of the challenges we face, we can do our best work.
- Our colleagues in Research Administration, Environment, Health & Safety Office, and others are aligned with MIT's research goals and follow prudent and commonsense practices.

Key Compliance Requirements

Transparent Reporting

- To guard against undue external influence, the U.S. government imposes mandatory disclosure and reporting requirements on federally funded projects. It's crucial that we record the time spent working on federally funded efforts in a timely and accurate way. Those considered to be in key roles must also accurately report to government sponsors concerning any outside financial interests and professional commitments.
- Separately, and regardless of the source of funding for our research, including gifts provided to support research, MIT policy requires each of us to report to the Institute any personal financial interests or outside professional activities that have the potential to pose a conflict of interest or conflict of commitment to our responsibilities here.
- Remember that our internal processes for reporting to MIT are separate and distinct from reporting to the government sponsors of our research. It is important to make sure that what we each report to MIT and to sponsors is **transparent, complete, and consistent**. Discrepancies in reporting can cause serious problems.

Export Controls

- Engagements with colleagues outside the U.S. are subject to export control laws. Before sending any materials (including prototypes, technology, and software) outside the U.S., which violate export control laws, we need to check with MIT's Export Control Team. (If your research group has a Technology Control Plan, discuss the requirements.)
- Some research institutions outside the U.S., including universities, are subject to country-specific or institution-specific sanctions. We must check with the Export Control Team to assure that no such sanctions apply to our research. This can be coordinated through the Director of Administration or other administrative officer for our DICI. More generally, any of MIT's **Informal International Collaborations tool** to learn who concerns about an individual collaborator or their institution.
- Some agreements specifically call out restrictions on exports. Please assist your understanding of any such agreement-specific restrictions.

Cyber Security

- Our work needs to be kept secure from cyber threats that can derail our research.
- If you see something that looks odd in a system, tell the administrator.

Institutional Tools Supporting Compliance

Guidance for Risk Management

The “[Ten Key Points for MIT Faculty & PIs When Engaging Internationally](#)” help faculty and PIs navigate international collaborations while minimizing risk. This is part of the [MIT GLOBAL SUPPORT RESOURCES](#)

Compliance Reporting Tools

[MyCOI-OPA+](#), the consolidated FCOI/OPA reporting tool, simplifies disclosure of outside activities and conflicts of interest for researchers.

Collaboration and Visitor Monitoring

The [Informal International Collaborations \(IIC\) Tool](#) assesses informal collaborations, and visitor monitoring manages risks from individuals from elevated-risk countries.

External Contract Depository

NIH and NSF require researchers to provide copies of their non-MIT international agreements (OPAs) for submission to the agency. MIT collects these in the [External Contract Depository](#) (ECD).

Register Travel and Secure Device Program

[Register your travel](#). MIT strongly encourages traveling with loaner devices. IS&T provide pre-configured [secure laptops and mobile devices to researchers traveling internationally](#).

Informal International Collaborations

- MIT's [Informal International Collaborations \(IIC\)](#) tool provides MIT researchers guidance needed to navigate federal laws, regulations, and agency requirements for their collaborations with international peers and entities.
- Informal collaborations include activities such as **conversations, speaking engagements, sharing of ideas or data with researchers from other institutions where there is no agreement to which MIT is a party, no required deliverable, and no funds exchanged** between the participants to pay costs of the collaboration, or for any other purpose.
- Informal or unofficial collaborations may be subject to the same regulations, restrictions and reporting requirements as formal agreements (grants, contracts, DUAs, etc.).
- These ARE NOT considered formal or legal reviews.



Financial Conflict of Interest & Conflicts of Commitment Compliance

MIT Conflict of Interest Policies & Disclosure

MIT Conflict of Interest Policies

Office of the Vice President for Research

Search

Overview Financial COI in Research Conflicts of Commitment (COC, OPA) Using MyCOI-OPA+ Contact Us

MIT Conflict of Interest Policies

MIT has a responsibility to generate positive learning opportunities for its students, preserve the integrity of its research enterprise and maintain the public's trust. The discussion, disclosure, review and management of real or perceived financial conflicts of interest (FCOI) and conflicts of commitment (COC) is an important part of that responsibility.

Resources

- SBIR/STTR Awards
- Sponsor-Specific Disclosure Requirements
- Assessing and Mitigating Risk

Quick Links

- FCOI Policy
- COC Guidance
- OPA Guidance
- MyCOI-OPA+
- CITI Training

MIT Conflict of Interest Policies (coi.mit.edu/):

- [Financial Conflict of Interest in Research \(FCOI\)](#)
- [Conflict of Commitment \(COC\) and Outside Professional Activities \(OPA\)](#)
- [Using MyCOI-OPA+](#)
- [MyCOI-OPA+ Resources](#)

FCOI Disclosure Triggers

Proposal Stage Disclosures

Investigators complete Kuali Coeus (KC) proposal certification including 3 COI screening questions, triggering disclosure if a potential conflict with a Significant Financial Interest is identified.

Award Stage Disclosures

FCOI Award disclosure is required before award activation if no disclosure at proposal was submitted or as required by sponsor.

Rolling Update Requirements

FCOI Disclosures must be updated within specific timeframes after financial interest changes or yearly to ensure timely conflict management.

- Within 90 days of acquiring or changing a [Significant Financial Interest \(SFI\)](#)
 - PHS and some other federally sponsored investigators must disclose within 30 days, and include [Sponsored Travel](#) in their disclosure

Disclosures in MyCOI-OPA: DLCI Overview [View course on Atlas](#) or [view slides](#)

Conflict of Commitment – OPA Disclosure

Conflict of Commitment

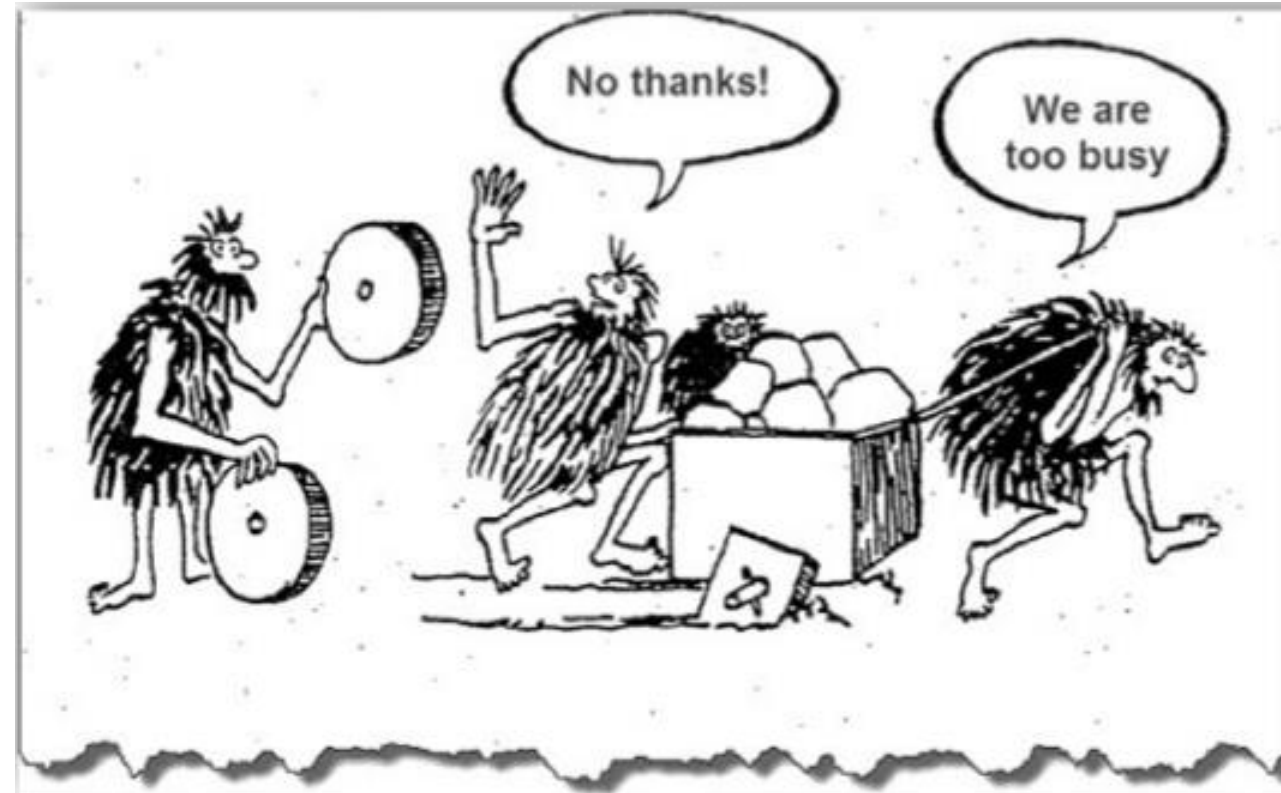
Lack of Formal CoC policy created confusion and inconsistency. See the updated [Conflict of Commitment Guiding Principles](#).

- New definitions and standards clarify expectations for faculty, researchers, and staff
 - Standard of *Reasonably Related* to Institutional Responsibilities, not reporting on all activities outside of MIT
 - Shared responsibility between VPR, Provost and HR

Disclosure Triggers and Rolling Update Requirements

OPA Disclosures must be updated within 30 days of starting a new engagement, renewing an existing one, or yearly to ensure timely conflict management.

Don't delay administrative requirements:



Let's take a pause so we can get this done faster!

Key Federal Mandates and Institutional Responses

Recent updates influenced by the CHIPS Act and NSPM-33 to enhance research integrity

Mandatory Research Security Training

New rules require Covered Individuals (senior and key personnel) to complete mandatory research security training programs.

Standardized Disclosure Forms

Standardized disclosure forms, Common Forms, are adopted to improve transparency and accountability in federally funded research.

Foreign Collaboration Disclosure

NIH and NSF require supporting documentation for foreign engagements that are external to MIT sponsored programs. Sponsors also have varied requirements to provide information on foreign activity, including subawards.

Malign Foreign Talent Recruitment Program Restrictions

Agencies impose restrictions on malign foreign talent recruitment programs (MFTRP) and increase scrutiny of foreign collaborations.



Research Security Training

Research Security Training (RST)

Federal Agency Mandated Training

Research Security Training is required for **Covered Individuals (senior/key personnel)** on **NSF**, and **DOE** proposals within 12 months prior to submission (NIH and other Federal agencies will implement requirements in coming months).

MIT Research Security Training (RST) Implementation and Deadline

MIT provides a four-module course covering disclosure, risk mitigation, and secure collaboration via Atlas Learning Center. **MIT mandates training completion by December 31, 2025, with earlier deadlines based on sponsor specified deadlines.**

Certification and Validation

Completion is recorded in Atlas and Kualu Coeus (KC) **Person Training Details**. Validation is performed in KC at proposal submission and Award/Modification set up to ensure compliance. **Learn more:**

Role of Research Administrators

Research Administrators use KC to confirm training completion at Proposal stage, remind investigators of deadlines, and prevent proposal submission delays. **Learn more:** [Research Security Compliance: DLCI Role](#)

Research Security Compliance: DLCI Role

eLearning [Research Security Compliance: DLCI Role](#) explains importance of reading sponsor and solicitation guidance on 'Covered Individuals' to be added to a proposal Key Personnel and provides an overview of regulations.

MIT Research Security Training

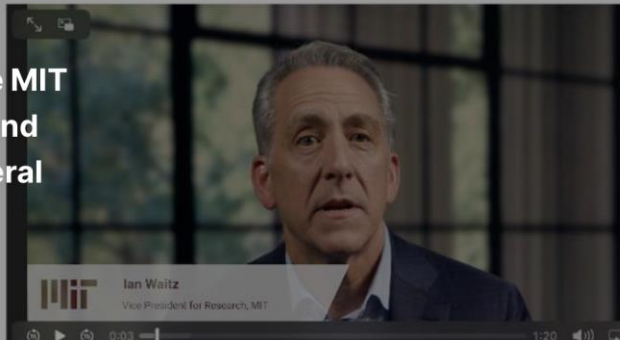
The MIT Research Security Training program ensures compliance with federal regulations [NSPM-33](#) and [42 USC sec. 19234](#) of the CHIPS and Science Act, and promotes secure research practices. It is mandatory for MIT Covered Individuals involved in federally-funded research to complete this training.

While you may not be required to take this training, doing so will be valuable for providing you a clear picture of the relevant issues and will better enable you to provide the best assistance to PIs and other members of MIT's research community, of which research administrators are a vital part.

MIT Research Security Training

modules were developed to provide MIT specific guidance, best practices, and resources for compliance with Federal regulations and MIT policy.

A Message from MIT Vice President for Research Ian Waitz



0:03 1:20

It's recommended for Research Administrators to complete RST training (taken in order):

[Research Security Module 1 of 4](#)

[Research Security Module 2 of 4](#)

[Research Security Module 3 of 4](#)

[Research Security Module 4 of 4](#)

KC validation: RST Training Compliance

Kuali Coeus (KC) validations at Development Proposal and Award stage are designed to ensure compliance with federal agency *Research Security Training* mandates. Learn how to identify and use KC features, verify training completion, and meet compliance requirements. **Learn more:** [View KC validation: RST Training Compliance on Atlas](#)

KC validation for Research Security Training Compliance: A Guide for DLCI Administrators

100% COMPLETE

KC Features for Research Security Training Compliance

Data Validation

Proactively validate RST status of Key Personnel

Turn on Data Validation. Error(s) will indicate PI, Co-I, or KP needs to complete their Research Security training. This hard error prevents the proposal from routing if those listed on Key Personnel that have not completed Research Security Training.

Note: the error will not list the name of the person with incomplete research security training, only their role.

Data Validation

Turn Off

Show 10 entries

Search:

Area	Section	Description	Severity	Actions
Error				
Key Personnel		The Investigators are not all certified. Please certify Cariolo, Ian C.	Error	Fix It
Key Personnel		The Investigators are not all certified. Please certify Trainor, Carole A.	Error	Fix It
Personnel		KP needs to complete their Research Security training.	Error	Fix It

Completion of the *Research Security Training* modules is recorded in the Atlas Learning and Kuali Coeus (KC) following an overnight feed. Verify Key Personnel training completion to route the proposal and meet agency compliance requirements.

Biographical Sketch Current & Pending (Other) Support Common Disclosure Forms

Common Disclosure Form Implementation



Adoption of Common Forms in SciENCv

NSF requires use of SciENCv to generate and certify *Biographical Sketch* and *Current & Pending (Other) Support* disclosures. NIH is planning to transition to SciENCv and the common forms and will announce an implementation date in the future.

NIH SciENCv Implementation

NIH announced plans to mandate use of SciENCv and **ORCID IDs** for senior personnel, and then rescinded the notice. The date for implementation has not been announced. The current forms and FAQs on disclosure requirements

RAS Sponsor Disclosure Tools





See RAS Sponsor Disclosure page and guidance on [Using SciENCv](#). SciENCv (Science Experts Network Curriculum Vitae) is an electronic system available through NCBI. Researchers and delegated administrators can use SciENCv to create and maintain biosketches for submission with NIH and NSF grant applications and annual reports. Furthermore, SciENCv can be used to create and update Current and Pending Support documents in NSF-approved format required by NSF and DOE (check solicitation to confirm).

What you can do to prepare: NIH & SciENcv

Sign in to [SciENcv](#) see [Access SciENcv using MIT Touchstone](#)

NIH has Preview formats available. Log in, click + **New Document**, and select the NIH Biographical Sketch PREVIEW Common Form or the NIH Other Support PREVIEW Common Form. You can import data from either eRA Commons or ORCID, from a previous document in SciENcv, or start from scratch manually.

What to Know About the Preview Forms:

-  You can save, reopen, and edit preview forms in SciENcv.
-  PDF-download functionality is **disabled**.
-  Preview form data **will not be transferred** to the official forms —**preview content will be deleted once official forms are released**.
-  Do not use preview forms for NIH submissions. **Continue using the current NIH Biosketch and Other Support formats until the Common Forms are officially implemented.**

Current NIH Disclosure Forms

NIH: Disclosure and Reporting Requirements

This training is provided to inform MIT researchers about NIH disclosure and reporting requirements, as well as the tools and resources that MIT has put into place to assist researchers in complying with these requirements. [View on Atlas](#)



▼ INTRODUCTION

Science & Security: A Changing Landscape

▼ NEW NIH REQUIREMENTS

What Researchers Need to Know

Biosketch: What's New?

Other Support: Overview

Other Support: Significant Changes

Foreign Component Disclosure



Agreements external to MIT with a foreign institution must be disclosed

- Unredacted copies of all outside contracts or agreements with foreign entities must be submitted as part of all Other Support documents, either at Just-In-Time (JIT) or in the Progress Report (RPPR) (these are agreements between the PI/KP and a foreign entity directly).
- Documents must be in English (machine translations are acceptable).
- Prior to submitting to NIH, researchers must upload appropriately formatted documents to the MIT [External Contract Depository](#) (ECD) to receive a review for compliance to NIH requirements.
- Only contracts that have been uploaded to the ECD and reviewed should be included in submissions to NIH.

EXIT

E-signatures are now required on Other Support submissions

- Other Support documents submitted as part of JIT or RPPR must have the principle investigator and/or senior/key person's electronic signature, using the electronic signature software of their choice, and in alignment with institutional



Sponsor Specific Disclosure

RAS Sponsor Specific Disclosure Requirements

Federal sponsors require full disclosure of project support and are continually updating their requirements for how and when that information is disclosed in proposals and progress reports. Because requirements vary from sponsor to sponsor, RAS has created resources to help researchers and research administrators comply with the requirements for each sponsor.

Department of Energy / Office of Science Disclosure Guidance

Last updated: November 6, 2023

The following information is excerpted from the [DOE Office of Science \(DE-FOA-10-001\)](#). However, investigators are advised to refer to the funding notice for any additional requirements.

Biographical Sketch

What to disclose

A biographical sketch (biosketch) is to provide information that can be used by reviewers to evaluate the PI's potential for leadership within the scientific community. Examples of information of interest are invited and/or public lectures, awards received, scientific publications, committees, conference or workshop organization, professional society activities, international or industrial partnerships, reviewing or editorship activities, or other leadership experiences.

The biographical information (curriculum vitae) must include the following items page limit:

- **Education and Training:** Undergraduate, graduate and postdoctoral training institution, major/area, degree and year.
- **Research and Professional Experience:** Beginning with the current position in chronological order, professional/academic positions with a brief description of the position, volume number, page numbers, year of publication, and website address if electronically. Patents, copyrights and software systems developed may be included in addition to or substituted for publications. An abbreviated style such as the Physical Review Letters (PRL) convention for citations (list only the first author) may be used for publications with more than 10 authors.
- **Synergistic Activities:** List no more than 5 professional and scholarly activities related to the effort proposed.

In addition, the biographical sketch must include information to permit DOE to identify individuals who are conflicted with or potentially biased (favorably or unfavorably) as an investigator. Include a section entitled "Identification of Potential Conflicts of Interest in Selection of Reviewers" that will not count in a page limit.

National Institutes of Health Disclosure Guidance

Last updated: March 9, 2022

NIH requires the disclosure of biographical, other support and foreign component information as part of the grant application process and, as requested, in post-award progress reports. The information below summarizes key NIH disclosure requirements and provides links to more detailed information.

Effective January 25, 2022:

- Supporting documentation for outside contracts, agreements and other working arrangements with foreign entities must be submitted with *Other Support*. See "Supporting Documentation" in the *Other Support* section below for instructions on how to comply with these requirements at MIT.
- The new FORMS-G for *Other Support* has an added signature block for the PI/KP to certify the accuracy of the information submitted. Each form must be **electronically signed** by the PI/KP and submitted as a flattened PDF. Electronic signatures can be generated using [DocuSign](#) or [Adobe Pro DC](#) (requires external license); **wet signatures and image files are not acceptable**. RA Support has prepared instructions for preparing and flattening PDF attachments.

Biographical Sketch

What to Disclose

The biographical sketch (biosketch) provides an opportunity for each senior/key person listed in an NIH grant application to describe why they are well-suited for their role(s) in the project. All senior/key personnel are required to provide biosketches. Senior/Key personnel includes Investigators, Other Significant Contributors (OSC), plus could include consultants and technical staff if they meet the definition of senior/key personnel. Senior/Key personnel do not necessarily need to be paid from the grant, but they do require effort. The only exception is the role of OSC, they do not need to commit effort by definition of that particular role. OSCs should also certify in the MIT Quali Coeus (KC) system. Required information in the biosketch may vary depending on the solicitation type, so please review the solicitation details.

When to Disclose

Biographical sketches (biosketches) are required in new and competing grant applications. See [NIH Biosketch Format Pages, Instructions and Samples for details](#).

National Science Foundation Disclosure Guidance

Updated October 3, 2025

NSF requires full disclosure of current and pending support, which includes domestic support and any foreign support or engagement.

The new [NSF Proposal & Award Policies and Procedures Guide \(PAPPG 24-1\)](#) went into effect on May 20, 2024.

Biographical Sketch

What to Disclose

NSF requires a biographical sketch for each individual identified as Senior Personnel. Detailed information about the content is available in the [NSF Proposal and Award Policies and Procedures Guide](#).

Of particular note, the PAPPG requires Senior Personnel to list "all the individual's academic, professional, or institutional appointments, beginning with the current appointment." With regard to professional appointments, Senior Personnel must identify all current domestic or foreign professional appointments outside of the individual's academic, professional, or institutional appointments at the proposing organization.

When to Disclose

Required biographical sketch information must be disclosed to NSF when grant applications are submitted.

How to Disclose

The biographical sketch is currently limited to three pages for each individual identified as Senior Personnel.

The only approved format for creating a biographical sketch is [SciENcv](#), which will produce an NSF-compliant PDF version of the biographical sketch. Proposers must save these documents and submit them as part of their proposals via Research.gov.

- [FAQs on using SciENcv](#)
- [SciENcv Guidance on Creating an NSF Biographical Sketch](#), including step-by-step instructions and screenshots for each of the four required sections

[Creating an NSF Biographical Sketch](#), including step-by-step instructions and screenshots for each of the four required sections

MIT Resources and Tools

- [NIH: Disclosure Reporting Requirements Training](#) (training for MIT researchers – requires MIT certificate) – Jan 25, 2022
- [MIT External Contract Depository](#) (requires MIT certificate)
- [Awards and Pending Proposals Report](#) (requires MIT certificate and KC roles)
- [VPR/RAS NIH Checklists and Preparation Guide](#)
- [NIH Disclosure and Compliance Checklist \[PDF\]](#) – October 2022

NIH and Federal Resources

- [NIH Grants Policy Statement](#)
- [NIH Application Guide](#)
- [NOT-OD-19-114: Reminders of NIH Policies on Other Support and on Policy](#)

NSF and Federal Resources

- [NSF PAPPG 24-1 – Effective May 20, 2024](#)
- [Current and Pending Support FAQs \[PDF\]](#)
- [NSF Pre-Award and Post-Award Disclosures](#)
- [SciENcv](#)

MIT Resources and Tools

- [NSF Proposal Prep Checklists](#)
- [NSF Disclosure Guidance Checklist \[PDF\]](#) – September 22, 2021
- [External Contract Depository](#)
- [Awards and Pending Proposals Report](#) (requires MIT certificate and KC roles)

Malign Foreign Talent Recruitment Program (MFTRP)



Motivation for prohibiting MFTRP: Protect our work and Intellectual property

Protecting Intellectual Property

Policies aim to mitigate foreign influence risks and safeguard intellectual property in federally funded projects.

Roles of Research Administrators

Administrators be aware of sponsor restrictions and certifications to maintain funding eligibility.



Prohibition of MFTRPs Participation

Federal agencies ban participation in **Malign Foreign Talent Recruitment Programs** to prevent unethical or illegal activities. Note: Not all Foreign Talent Recruitment Programs as considered **Malign**. **Research Security Training** modules assist researchers in identifying concerns that may indicate that an offer or opportunity could be an MFTRP.

Certification and Compliance

NSF mandates certification of non-participation through Research.gov, and in the certification on Current & Pending (Other) Support. DOE also requires certification of non-participation with Current & Pending (Other) Support. Other agencies vary in implementation method.

Certification

I certify that the information provided is current, accurate, and complete. This includes but is not limited 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 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.

CANCEL

CERTIFY

Foreign Collaborations

NSF Supporting Documentation Requirements

- Effective **October 10, 2025**, NSF requires supporting documentation for foreign engagements. This has been a requirement for NIH since 2022.
- MIT developed the [External Contract Depository](#) (ECD) to assist researchers and administrators. ECD stores contracts, grants, and agreements related to foreign appointments and talent programs.
- Documents undergo high-level review by MIT's VPR and General Counsel offices.
- Supporting documentation will be made available to NSF upon request
- Log in: [External Contract Depository](#) (Touchstone required)
- For more information: [NIH Sponsor Information](#), [NSF Sponsor Information](#)

NSF International Activities – What to Disclose

- PIs should consult with [RAS liaison](#) before submitting proposals with international components, including research, training, and/or education carried out in cooperation with foreign counterparts either overseas or in the U.S. using virtual technologies.
- On proposal cover sheet list primary countries involved (max 5), including countries for participant engagement and budgeted international conference travel.
- Enter country names for foreign subawards or consultant arrangements.

Questions – Support & Resources

- See [VPR Security, Integrity, and Compliance](#) for contact information and learning, including **Research Security and Foreign Engagement** (research-compliance-help@mit.edu)
- RAS [Sponsor Information](#) and [Sponsor Disclosure Requirements](#)
- Your RAS Contract Administrator
 - [By DLC](#)
 - [By Sponsor/Agency](#)
- RA Support Team – ra-help@mit.edu

We Appreciate Your Feedback

Please use one of the following methods to share your feedback:

- **QR code** below to access the survey using your phone or mobile device



- Click this link (copied to the chat)

https://mit.co1.qualtrics.com/jfe/form/SV_1Lz9aabnzdKIQAC

The link will also be provided in a follow-up email