HARVARD UNIVERSITY

Office of the Vice Provost for Research

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Research Security Training FAQs

1. What is Research Security Training?

Research Security Training is designed to create awareness of, and protect against, external threats and risks to U.S. funded research and the values of responsible conduct of research, research ethics, and rigor & reproducibility, which underpin our research enterprise. According to the federal government, the policies and practices of some foreign governments may threaten the research integrity of U.S. funded research. Additionally, some research results from U.S. funded research can be used in ways that contribute to human rights abuses, surveillance, and military aggression. The aim of research security training is to raise awareness of such risks among funded researchers and research institutions and to highlight resources to guard against the same.

2. Why is Research Security Training Required?

Research Security training is listed as one of four elements of a Research Security Program required by National Security Presidential Memorandum 33 (NSPM 33), issued on Jan. 14, 2021, to safeguard our research ecosystem. The "CHIPS and Science Act of 2022," codifies the requirement for research security training for federal research award personnel into law. The required elements of Research Security Training are:

- The benefits and risks associated with **International Collaborations**
- **Cybersecurity** risks
- **Travel Security** risks, and
- The Importance of Transparency and **Disclosure** of potential outside funding and potential influence.

Harvard developed a Research Security Training that covers these elements, and highlights Harvard resources to facilitate responsible and beneficial international research collaboration.

3. Who must take Research Security Training?

Per Section 10634 of the "CHIPS and Science Act of 2022," **Covered Individuals** (senior/key personnel) at **Covered Institutions** listed on the application for a federal award are required to take Research Security Training. **Covered Institutions** are required to certify annually that these individuals have completed training that meets the guidelines in the act.

4. **What is a Covered Institution?**

The Office of Science and Technology interprets "**Covered Institution**" under NSPM-33 to include:
   a. **Institutions of higher education**, federally funded research and development centers (FFRDC), or nonprofit research institutions, that
   b. Receive **more than $50 million per year**, in U.S. federal funding.

Harvard falls squarely within this definition.

5. **Who is a Covered Individual?**

Per Section 10638 of the "CHIPS and Science Act of 2022," a **Covered Individual** is defined as "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."

   Note: The definition of a Covered Individual is based on their contribution to the project as defined above and is not related to the title of the individual. At Harvard, a Covered Individual could be a faculty member, research scientist, researcher, visiting scientist, student (undergraduate or graduate), post-doctoral fellow, etc., regardless of whether they are paid or unpaid. Similarly, Congressional Legislation and Federal Agencies use different terms such as PI, Co-PI, Investigator, Project Director, Project Co-Director, "Key performer", "Key personnel", "Senior personnel", "Named Researcher", "Named Individuals", "Sponsored Researcher", etc.

6. **When will the Research Security Training be Available?**

The training will be launched on 31 January 2025 and will be assigned to all **Covered Individuals** at Harvard University to complete.

Research administrators are not included in the definition of **Covered Individuals** but are highly encouraged to take the training when it becomes available in the Harvard Training Portal, starting January 1, 2025, to understand the contours of the Research Security landscape and help guide and assist **Covered Individuals** in complying with Research Security requirements.

7. **When do I take Research Security Training?**

Training must be completed and reported in **GMAS** prior to Federal award set-up, and annually thereafter during the life of the federal award. The annual renewal will be in the form of an update/refresher.

8. **How do I access Research Security Training?**

Harvard's Research Security Training is available through the Harvard Training Portal here. You can log-in using your HarvardKey. If you are a **Covered Individual,** the training will be assigned to you and appear in your trainings queue for completion.

9. **I do not have an HUID—how do I take the training?**

Currently, Research Security Training is a requirement for active HUID holders who are **Covered Individuals** as defined above. If you are a **Covered Individual** under a subaward, the subaward terms will flow down to your home institution implementing requirements to take Research Security Training. If your home institution does not offer Research Security Training, then you are directed to the National Science Foundation's (NSF) Research Security Training. NSF has developed and made available research security training modules which meet the requirements of NSPM-33 and the CHIPS and Science Act of 2022. Each module should take about 60 minutes and a certificate can be downloaded and printed as a record of completion.

10. **I work in a field that does not involve critical or emerging technologies strategically important to U.S. national security. Why do I have to take the training?**

Research security is a shared responsibility across all academic disciplines and university functions. Faculty often work on cross-disciplinary research and scholarly endeavors, including teaching activities. Through these activities, an individual may be exposed to

critical or emerging activities. In addition, many of the research security concepts are portable to general research and daily life, such as cybersecurity and recognizing when an individual's stressors (e.g., finances) could adversely impact their decision-making in the workplace, threatening the integrity of the individual or the institution. Therefore, it is important for all **Covered Individuals** to complete Research Security training.

11. **What is being done to ensure that this training does not discourage vital international engagements and collaborations necessary to solve the world's most pressing problems?**

    Harvard encourages international collaboration and maintains an Openness in Research policy to guard against discrimination in access to, and participation in, University facilities and activities. The training developed by Harvard is intended to balance research security with promoting international collaboration, leaning into our core research principles of research ethics, responsible conduct of research, and rigor and reproducibility to encourage and focus on **responsible** international collaboration to address pressing global problems.

12. **Where can I find more information on research security and research security training?**

    The Office of the Vice Provost for Research (OVPR) hosts a Research Security Program website with additional Research Security Training and research security resources.

13. **Whom do I contact for more information?**
    OVPR: Melissa_Lopes@harvard.edu

    School Contacts:

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