



Responsible Office	Grants and Sponsored Projects	Adoption Date	02/25/2026
Responsible Official	Associate Provost for Research and Sponsored Projects	Last Revision	02/25/2026

NSF RESEARCH SECURITY POLICY

I. POLICY STATEMENT

Fairleigh Dickinson University is committed to fostering an environment in which research conducted under a grant provided by the National Science Foundation (NSF) is done securely and in accordance with the Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act of 2022 (P.L. 117-167) and National Security Presidential Memorandum-33 (NSPM-33).

II. PURPOSE OF POLICY

The purpose of this Policy is to assist members of the FDU community who may be conducting NSF-funded research to meet the legal and security requirements required by the NSF in the 2025 Important Notice No. 149. The full text of this notice may be found at <https://www.nsf.gov/notices/important/important-notice-no-149-updates-nsf-research-security/in149>.

III. SCOPE OF POLICY

Fairleigh Dickinson University requires all faculty and staff who may be involved in conducting NSF-funded research to adhere to this Policy.

IV. POLICY STATEMENT

A. Required Training

All parties listed as senior or key personnel must complete research security training within 12 months prior to any proposal submission.

To complete this training, affected personnel should consult the Office of Grants and Sponsored Projects' Announcement web page which may be found at <https://www.fdu.edu/academics/research/grants-sponsored-projects/announcements/>.

B. Prohibition of Participation with any Malign Foreign Talent Recruit Program

A Foreign Talent Recruitment Program (FTRP) is a program organized, managed or funded by a foreign government to recruit science and technology professionals or students in targeted fields. Malign Foreign Talent Recruitment Programs (MFTRPs) encourage, or even require, unethical or criminal behavior or contain requirements that may conflict with the terms of federal research or development awards. A foreign talent program is considered “malign” when it offers cash or in-kind compensation (complimentary foreign travel, honorary appointments, promised future compensation, research funding, etc.), in exchange for one of the following:

- i. Engaging in the unauthorized transfer of intellectual property, materials, data, or other nonpublic information;
- ii. Recruiting or training other talent recruitment program members, circumventing merit-based processes;
- iii. Establishing a laboratory or company or accepting a faculty position or other employment in a foreign country in violation of terms and conditions of a Federal research award;
- iv. Applying for and receiving research funding from the foreign institution’s government funding agencies with the foreign institution as the awardee, without disclosure to and approval from Fairleigh Dickinson University;
- v. Attributing awards, patents, publications, and projects to the foreign institution, if conducted under a Federal research award, omitting Fairleigh Dickinson University and/or the Federal funding agency;

OR is characterized by contracts or agreements with:

- i. Oppressive termination clauses that restrict a researcher’s ability to leave a foreign talent program contract except in extraordinary circumstances;
- ii. Non-disclosure requirements; or
- iii. Duplication of effort under Federal awards or conflicts of commitment with Federal awards (P.L. 117-167 Section 10638)

AND is sponsored by:

- i. A foreign country of concern or an entity based in a foreign country of concern
 - a. The term “foreign country of concern” is a country that is a covered nation (as defined in 10 U.S.C. 4872(d)) and any country that the Secretary, in consultation with the Secretary of Defense, the Secretary of State, and the Director of National Intelligence, determines to be engaged in conduct that is detrimental to the national security or foreign policy of the United States (15 CFR 231.102)
 - b. Countries of Concern include but may not be limited to China, Russia Federation, North Korea and Iran;

- ii. An academic institution on the National Defense Authorization Act (NDAA) 2019 Section 1286(c)(8) List, p.2; or
- iii. A foreign talent recruitment program on the NDAA 2019 Section 1286(c)(9) List, p.9.

Individuals participating as senior or key personnel in any NSF-funded research or proposal are prohibited from being involved with a MFTRP.

Annually, all Principal Investigators (PIs) and Co-PIs are required to certify via Research.gov that they are not a party to a MFTRP.

C. Required Documentation

All individuals who may be participating in NSF-funded research must retain documentation for all foreign appointments, talent programs, and current/pending support. The NSF may require disclosure of such documentation at its discretion.

DRAFT