

Federal Research Security and NIH Other Support Disclosure Training

I. Overview

In alignment with National Institute of Standards and Technology (NIST) security requirements for agencies covered under the [CHIPS and Science Act](#) (C&S) and National Institutes of Health (NIH) notice [NOT-OD-25-133](#) on other support disclosure training, the Grants and Contracts Office (GCO) is pleased to report that Icahn School of Medicine at Mount Sinai (ISMMS) is compliant through the CITI Program course titled “Research Security Training (Combined)”, a single-module, condensed training based on the NSF Research Security Training framework. The time required to complete the course is at least 1 hour.

This course meets the requirements outlined in the CHIPS and Science Act and is recognized by the NIH and other agencies.

We encourage covered individuals of sponsored project agencies covered under the C&S Act and senior/key personnel of NIH sponsored projects submitting other support to complete this training as soon as possible. The training must be completed prior to submission of a competitive C&S federal application or submission of Other Support to NIH.

II. Resource Document Sections

- [Overview](#)
- [Covered Individuals and Senior/Key Personnel Definitions](#)
- [NIH Other Support Disclosure Training Requirements under Notice NOT-OD-25-133](#)
- [NIST Security Training Requirements for Agencies under the CHIPS and Science Act](#)
includes a listing of federal agencies
- [CITI Course Completion Instructions](#)
- [Submission of Research Security and Other Support Disclosure Training Certification to the GCO](#)
includes subrecipient instructions

III. Covered Individuals and Senior/Key Personnel Definitions

Covered Individual:

Source: [National Defense Authorization Act for Fiscal Year 2021](#) used in [CHIPS and Science Act](#)

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.

Senior/Key Personnel:

Source: [National Institutes of Health Grants Policy Statement](#)

The PD/PI and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they receive salaries or compensation under the grant. Typically, these individuals have doctoral or other professional degrees, although individuals at the masters or baccalaureate level may be considered senior/key personnel if their involvement meets this definition. Consultants and those with a postdoctoral role also may be considered senior/key personnel if they meet this definition. Senior/key personnel must devote measurable effort to the project whether or not salaries or compensation are requested. "Zero percent" effort or "as needed" are not acceptable levels of involvement for those designated as Senior/Key Personnel.

IV. NIH Other Support Disclosure Requirements under Notice NOT-OD-25-133

Starting October 1, 2025 under [NOT-OD-25-133](#) senior/key personnel when submitting Other Support to the NIH, whether for Just in Time (JIT), as part of a Research Performance Progress Report (RPPR) submission, or as part of a prior approval request, must complete the training.

V. NIST Security Requirements for Agencies Covered under the CHIPS and Science Act

For deadlines on or after October 10, 2025, all covered individuals on applications in which the agency is covered under the [CHIPS and Science Act](#) must complete the training. The following agencies are covered under the Chips and Science Act:

- National Science Foundation (NSF) Click here for additional information on covered individuals. Additional Information for [covered individuals](#)
- National Aeronautics and Space Administration (NASA)
- Department of Defense (DOD)
Additional information for [covered individuals](#)
- Department of Energy (DOE)
Additional information for [covered individuals](#) | [DOE Research Security Training Requirement](#)
- Department of Commerce (DOC)
- Department of State (DOS)
- National Institute of Standards and Technology (NIST)

Please check the agency website and the notice of funding opportunities for the most up to date information on requirements for covered individuals.

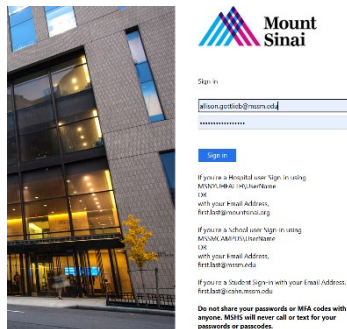
You may also refer to this [CHIPS and Science Act of 2022 Summary Fact Sheet](#) for the agencies listed and for further information.

VI. CITI Course Completion Instructions

To access the Federal Research Security and NIH Other Support Disclosure Training course:

1. Click [here](#) to auto-enroll.

2. Sign in SSO.



3. Go to Courses Ready to Begin > Research Security Training (Combined) > Start Now.



Please be sure that your [CITI profile is affiliated with ISMMS](#) before attempting to add the course. If you are new to CITI, please click [here](#) for additional instructions.

VII. Submission of Research Security and Other Support Disclosure Training Certification to the GCO

Provide to the GCO a copy of the CITI disclosure training certificate(s) with your submission. GCO will announce when Research Administration IT (RAIT) has linked the CITI training to Huron so that the certification appears in the investigator's eDMS profile. When that occurs, providing individual certificates will no longer be required.

Subrecipient Senior/Key Personnel Submitting NIH Other Support:

Provide certificate(s) of other support training completion or provide documentation from the subrecipient AOR that they have completed the training.

Subrecipient Covered Individuals in C&S Federal Sponsored Projects:

Compliance will be verified through the standard SOI language.