



EMORY
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Research Security Program Requirements

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AskRCRA

15 August 24

July 2024 new requirements

Research Security Program Requirements

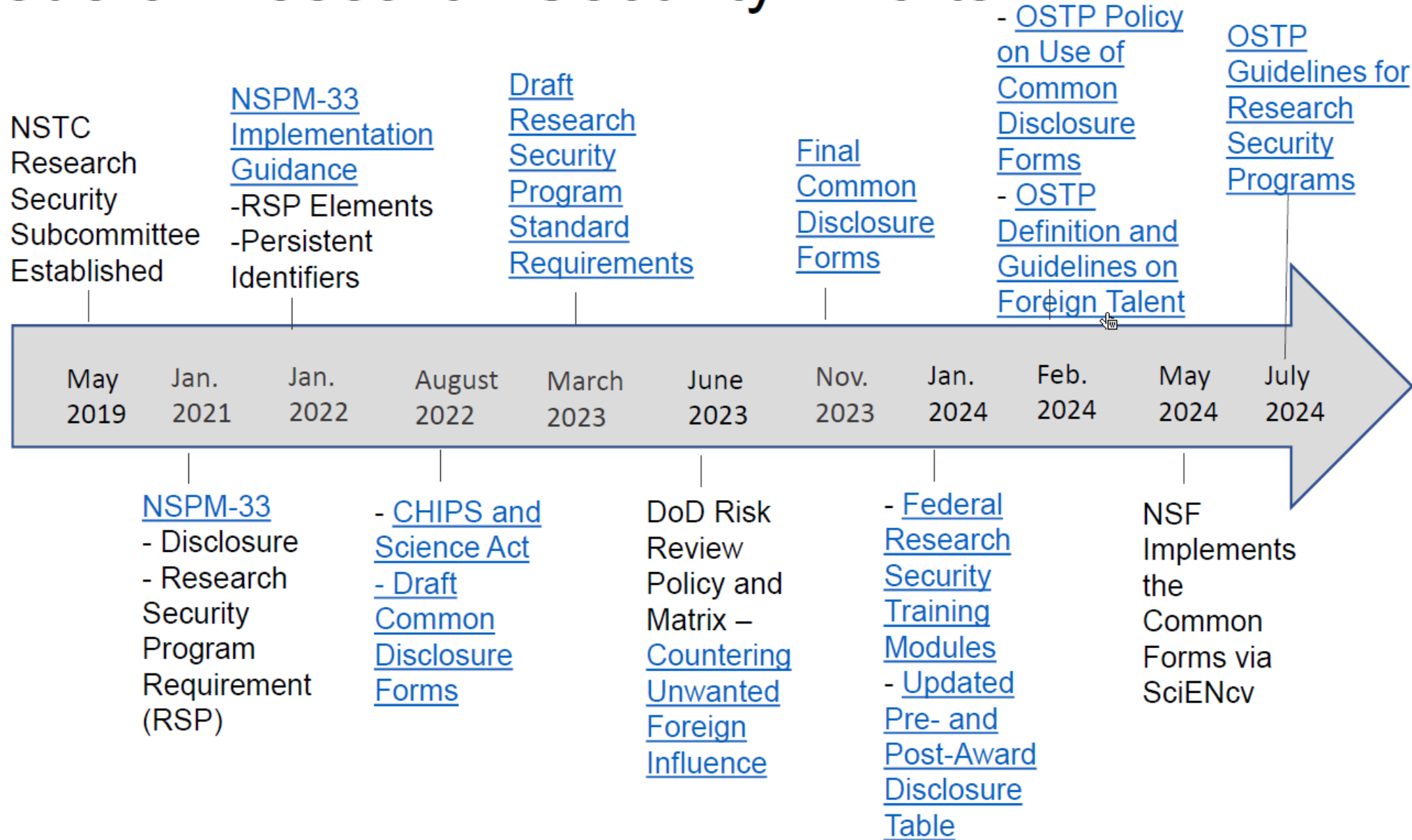
- Cybersecurity
- Foreign Travel Security
- Research Security Training
- Export Controls Training
- Additional Requirements
- Implementation Timeline



EMORY
UNIVERSITY

Research Compliance and Regulatory Affairs
Research Administration

Federal Research Security Efforts



Research Security Program OSTP Guidelines July 9, 2024

OSTP Issued standardized requirements for research security programs that federal funding agencies must require of recipient research institutions.

Federal research agencies shall require covered institutions to certify that their research security programs include elements relating to (1) cybersecurity; (2) foreign travel security; (3) research security training; and (4) export control training.



Research Compliance
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Research Administration

Research Security Program Requirements

Research Security Program OSTP Guidelines July 9, 2024

Previous Requirement:

Compliance with 12 of 15 requirements of FAR 52.204-21 *Basic Safeguarding of Covered Contractor Information Systems*.

New Requirement:

NIST is in the process of revising its NIST Interagency Report NIST IR 8481 ipd which will serve as the standard for cybersecurity for research organizations.

Emory's cybersecurity program is well established and will be updated as necessary for compliance the NIST standards.



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Research Security Program Cybersecurity

Research Security Program OSTP Guidelines

July 9, 2024

Previous Requirement:

Maintain org record of international travel by individuals

Advanced disclosure and authorization

Mandatory security briefings and advice regarding electronic device security prior to international travel including electronic devices utilized/bought for federally funded R&D.

New Requirement:

Federal agencies are creating a foreign travel security training program.

Individuals engaging in international travel must complete training at least every six years

Research institutions are required to have an organizational record of foreign travel.

Emory is proactively working on implementing a foreign travel tracking system.



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Research Security Program Foreign Travel Security

Research Security Program OSTP Guidelines July 9, 2024

Previous Requirement:

Very specific requirements for research security training and export controls training

New Requirement:

Recipients of federal funding must certify that researchers have completed research security training either from NSF's modules, or from Emory's training module in Brainier that covers the same elements.



Research Compliance
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Research Security Program Research Security Training

Research Security Program OSTP Guidelines July 9, 2024

Previous Requirement:

Specific criteria for export controls training

New Requirement:

Recipient institutions of federal funding must certify that individuals with research involving export-controlled technology must complete export controls training either from BIS administered training sessions, or from Emory's training module in Brainier that covers the same elements.



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Research Security Program Export Controls Training

Research Security Program OSTP Guidelines July 9, 2024

Federal funding agencies are permitted to develop additional research security program requirements (i.e. CUI, classified, highly restricted), but must justify the need and seek prior permission from OSTP



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Research Security Program Additional Requirements

Research Security Program OSTP Guidelines July 9, 2024

Federal funding agencies must submit their requirements to OSTP by January 9, 2025. The new requirements must be implemented by federal funding agencies prior to July 9, 2025.

Federal funding agencies must give recipient institutions up to 18 months (from the agency's requirements effective date) to implement the new requirements.



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Research Security Program Implementation Timeline

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