



EMORY
UNIVERSITY

NATIONAL SECURITY PRESIDENTIAL MEMORANDUM 33 (NSPM-33)

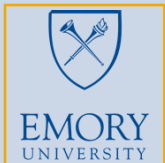
ASK RCRA
AUGUST 2026



National Security Presidential Memorandum 33



National Security Presidential Memorandum 33 (NSPM-33) **obligates research institutions that receive in excess of \$50m per year in total federal funding to establish research security programs**, to protect against foreign government interference and exploitation.



Emory's Research Compliance and Regulatory Affairs Office (RCRA) is spearheading the initiative to prepare the institution for the upcoming compliance requirements, in partnership with operational units including Office of Global Engagement, Office of Information Technology, local IT units, and others.



National Security Presidential Memorandum 33

- **January 2021:** Office of Science and Technology Policy (OSTP) released National Security Presidential Memorandum 33, intended to protect federally-funded U.S. research data from foreign government interference and exploitation.
- **January 2022:** Implementation guidelines released.
- **July 2024:** Further clarifications released.
- **September 2025:** Draft updates to the cybersecurity requirements circulated and released on Educause website. Subsequently removed.
- **TBD 2026:** Release of finalized guidelines.
- **January 2027:** Current compliance date.



NSPM-33: High-Level Overview

- 1. Disclosure Requirements and Standardization**
- 2. Consequences for Violations of Disclosure Requirements**
- 3. Digital Persistent Identifiers**
- 4. Research Security Programs**
 - a. Research security training**
 - b. Export control training**
 - c. Cybersecurity program**
 - d. Foreign travel security**



NSPM-33: How is Emory meeting compliance?

1. Disclosure Requirements and Standardization (complete)

- a. Policy requirements
- b. Insight disclosures

2. Consequences for Violations of Disclosure Requirements (complete)

- a. Policy sanctions

3. Digital Persistent Identifiers (complete)

- a. ORCID iD registration, tracked via Research Security Compliance Dashboard

4. Research Security Programs (in progress)

- a. **Research security training:** Deployed in Brainier, completion required by policy and tracked via dashboard
- b. **Export control training:** Deployed in Brainier, completion required by policy and tracked via dashboard
- c. **Cybersecurity program:** Evolving in accordance with newly released requirements
- d. **Foreign travel security:** Implementation of travel registry, use of loaner device program required via policy

NSPM-33: Completed to Date





Research Security Program: Initiatives in Progress

- **Research Security Compliance Dashboard**
- **Cybersecurity Advisory Committee**
- **Cybersecurity Gap Analysis and Implementation**
- **Travel Registry Implementation**
- **International Travel Loaner Device Program**



Research Security Compliance Dashboard

- Available in production environment to anyone with an Emory NetID.
- Provides a view for researchers, Research Administration Services, Office of Sponsored Projects, and the Office of Research Compliance & Regulatory Affairs to monitor compliance by covered individual or study.
- Provides references for completion of outstanding requirements activities.
- Assists with institutional NSPM-33 compliance audits.



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Research Security Compliance

To meet evolving federal requirements, Emory will launch mandatory Research Security (RS) training starting [December 1, 2025](#). This training aligns with federal mandates and will coincide with the Annual Certification Cycle (December 1, 2025 – February 29, 2026).

Who must complete it: All Covered Individuals (those responsible for the design, conduct, or reporting of research).

How to comply: Complete the Research Security training in Brainier and update your COI disclosure profile in Insight.

Emory's Research Security Compliance Dashboard displays the current status of various training and other requirements for personnel on research projects for ease of tracking compliance completions in a central location.

For questions or comments regarding content, please contact researchsecurity@emory.edu. For technical issues, please submit a help ticket through ServiceNow.

My Research Security Compliance

- ✖

ORCID Registration [\(More Info\)](#)
- ✔

Research Security Training (Completed: 04/01/2024, Expires: Not Found)

Please note: Required training can be found in Brainier. Log into Brainier via PeopleSoft Self Service Learning Management prior to clicking on the links provided below to access the training.

- Research Security Training: <https://emory.brainier.com/#/object/2076>

Alternatively, you can log into Brainier via PeopleSoft Self Service Learning Management and search for training modules by subject matter to access the training modules.

Search for Research Security Compliance Data by Individual or EPEX Number

To look up an individual's compliance status, please search by **full last name** or **EPEX number**.

Rows per page	10					Showing 1-1 of 1 records		< 1 >
Last Name ↑↓	First Name ↑↓	Role	Department/Division	Project Title	RAS	EPEX	Research Security	ORCID
sundvall	Search	Search	Select...	Search	Select...	Search		
Sundvall	David W.	Co-Investigator	Rsch Compl & Reg. Affairs/Research Administration	CENTER: The SECURE C...	Office of Research	0000077556	✔	✔



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Export Search Results

Rows per page 10 ▾

Showing 0 of 0 records

< 1 >

Last Name ↑↓

Search

First Name ↑↓

Search

Role

Search

Department/Division

Select... ▾

Project Title

Search

RAS

Select... ▾

EPEX

Search

Research Security Export Control ORCID

No Records Found



Research Security Compliance Dashboard

In QA environment for testing:

- Export of filtered search results to spreadsheet
- Status of Export Control training
- Display of full ORCID iD number
- Removal of “My Research Security Compliance” section for users not required to meet NSPM-33 compliance

Dashboard work remaining:

- Updates to verbiage in alignment with December 2026 disclosure cycle.
- Incorporation of additional compliance requirements needed for the December 2026 disclosure cycle (Disclosure Profile Completion Date, research security “refresher” training status).
- Integration with Insight to gather up-to-date study team data and remediate gaps in prior data set.
- User testing and rollout to production.

NSPM-33: Work Remaining



¹Blocked pending resources to establish connection to Insight study team data.

²Blocked pending release of revised NSPM-33 guidelines.

Questions?





Links

- [National Security Presidential Memorandum 33](#) (January 2021)
- [Guidance for Implementing NSPM-33](#) (January 2022)
- [RCRA National Security Presidential Memorandum 33 overview](#)
- [Insight](#)
- [ORCID at Emory](#)
- [Research Security Compliance Dashboard](#)
- [International Travel Loaner Device Program](#)
- [U.S. Department of State Travel Advisories](#)
- [Generic Service Request Form](#) (ServiceNow)
- Policies
 - [7.11 Export Control](#)
 - [7.12 Visiting Scholar and Visiting Student](#)
 - [7.24 Research Institutional Conflict of Interest](#)
 - [7.38 Conflict of Commitment](#)
 - [7.7 Financial Conflicts of Interest in Research](#)
 - [7.82 Research Data Protection](#)
 - [7.9 Responsible Conduct of Research Training](#)
 - [10.18 Emory-Sponsored International Travel](#)
 - Research Compliance Training (in approval pipeline)
 - Information Security Program Management (draft in progress)