



Office of the Vice Provost for Research

Research Security Training Policy

INTRODUCTION

[Section 10634 of the CHIPS and Science Act of 2022](#) (CHIPS Act) established a research security training requirement for all “covered individuals” engaged in U.S. Government-funded research. Notably, the CHIPS Act established the training requirement “as part of an application for a research and development award.” Consequently, each “covered individual” listed on an application must certify that they have completed research security training “within one year of such application.” Since the CHIPS Act was signed into law, federal funding agencies have established policies to implement an annual research security training requirement as part of their grant application process.

POLICY

In compliance with the CHIPS Act, National Security Presidential Memorandum 33 (NSPM-33), and federal policies, all Boston College “covered individuals” (as defined in this policy) are required to complete Research Security Training within 12 months prior to submitting a proposal for federal research funding. Principal Investigators are responsible for determining which personnel on their project meet the criteria of a “covered individual.” **Any “covered individual” who fails to complete Research Security Training will not be allowed to submit proposals to federal funding agencies.**

DEFINITIONS

Covered Individual: someone who (a) contributes in a substantive, meaningful way to the development or execution of the scope of work of a project funded by the U.S. Government or proposed for funding by the U.S. Government and (b) is designated as a covered individual by the U.S. Government. At a minimum, covered individuals include any principal investigator (PI); project director (PD); co-principal investigator (Co-PI); co-project director (Co-PD); project manager; and any individual, regardless of title, that is functionally performing as a PI, PD, Co-PI, Co-PD, or project manager.

RESPONSIBLE OFFICES

This policy will be implemented by the VPR’s Office of Research Security, Integrity, and Compliance, and the VPR’s Office of Sponsored Programs.