

About This Policy

Effective Dates:

07/01/2026

Last Updated:

07/01/2026

Responsible University Administrator(s):

Assistant Provost for Research

Approving Body:

Office of the Provost

Policy Contact:

Office of the Provost, The Citadel

Purpose and Scope

The purpose of this policy is to ensure that The Citadel fulfills its responsibilities as a recipient of federally sponsored research funding by establishing requirements for Research Security Training for individuals engaged in applicable sponsored research activities. Pursuant to Subtitle D of the CHIPS and Science Act of 2022 and related federal agency implementation requirements, including requirements established by the National Science Foundation (NSF) and other federal research sponsors, institutions receiving federal research funding are required to establish processes for providing Research Security Training to individuals identified by the sponsoring agency or applicable federal requirements. This policy establishes the institutional requirements and framework for assigning, completing, documenting, and retaining records of Research Security Training to promote awareness of research security risks, protect the integrity of the research enterprise, and ensure compliance with applicable federal requirements. This policy applies to Principal Investigators (PIs), Co-Principal Investigators (Co-PIs), senior/key personnel, and other individuals identified by federal sponsors or institutional requirements as requiring Research Security Training. The corresponding procedures define the roles and responsibilities of investigators and the Office of Research & Grants in determining training requirements, assigning appropriate training modules, verifying completion, and maintaining documentation. Individuals are expected to complete required Research Security Training within the applicable timeframe, and the Office of Research & Grants will work with investigators to address outstanding training requirements and support compliance with applicable sponsor requirements.

Policy Statement

The Citadel requires individuals engaged in sponsored research activities to complete Research Security Training when required by external sponsors. Covered individuals shall complete the appropriate Research Security Training modules within the timeframe established by the Office of Research & Grants and/or the sponsoring agency. The Office of Research & Grants is responsible for establishing processes to assign, monitor, document, and retain records of required Research Security Training. Individuals who do not complete required Research Security Training within the applicable timeframe may experience delays in proposal submission or award/amendment activation or may be restricted from participating in applicable sponsored research activities until the training requirement is satisfied.

Process and Procedures

The Office of Research & Grants shall administer Research Security Training requirements in accordance with applicable federal sponsor requirements and institutional policy. The following procedures shall be followed to ensure appropriate assignment, completion, documentation, and retention of Research Security Training records.

Determination of Training Requirements

During proposal review, award acceptance, or award management activities, the Office of Research & Grants shall determine whether Research Security Training is required based on applicable sponsor requirements, award

terms and conditions, or institutional policy. The Office of Research & Grants shall identify the individuals required to complete training, including Principal Investigators (PIs), Co-Principal Investigators (Co-PIs), senior/key personnel, or other covered individuals.

Training Assignment

When Research Security Training is required, the Office of Research & Grants shall assign the appropriate training module through the NSF Research Security Training Resource Center housed in the institution's Learning Management System (e.g. Canvas). Individuals completing Research Security Training for the first time shall be assigned the initial training module, while individuals requiring subsequent training may be assigned refresher training, as appropriate. Investigators shall be notified of the training requirement and expected completion timeframe.

Completion Verification and Tracking

The Office of Research & Grants shall monitor completion of assigned Research Security Training and verify that required training has been successfully completed. Documentation of completion shall include the individual's name, training module completed, completion date, and completion status or score, when applicable. The Office of Research & Grants shall maintain a centralized tracking record to monitor training assignments and completion status.

Record Retention

Documentation verifying completion of Research Security Training shall be retained electronically within the official sponsored project records maintained by the Office of Research & Grants. Training documentation shall be stored with the applicable award records and retained in accordance with the institution's sponsored research record retention requirements and any applicable sponsor-specific requirements.

Noncompliance

Individuals who fail to complete required Research Security Training within the established timeframe may be restricted from participation in applicable sponsored research activities until the training requirement has been satisfied. The Office of Research & Grants may notify the Principal Investigator, Department Head, Dean, or other appropriate institutional officials regarding outstanding training requirements.

Roles and Responsibilities

Office of Research & Grants

The Office of Research & Grants is responsible for administering the institution's Research Security Training requirements and ensuring compliance with applicable federal sponsor requirements and institutional policies.

Responsibilities include:

- Reviewing sponsor requirements to determine when Research Security Training is required;
- Identifying individuals required to complete training;
- Assigning appropriate Research Security Training modules;
- Monitoring completion of required training;
- Maintaining documentation of completed training; and
- Communicating outstanding training requirements to investigators and appropriate institutional leadership.

Individuals Identified as Requiring Research Security Training

Principal Investigators (PIs), Co-Principal Investigators (Co-PIs), senior/key personnel, and other individuals identified as requiring Research Security Training are responsible for:

- Completing assigned Research Security Training within the timeframe established by the Office of Research & Grants and/or the sponsoring agency;
- Applying the principles and practices addressed through Research Security Training to their sponsored

- research activities; and
- Providing any additional information or documentation needed to verify compliance with training requirements.

Department Heads and Deans

Department Heads and Deans are responsible for supporting institutional compliance with Research Security Training requirements by encouraging timely completion of required training and assisting the Office of Research & Grants in addressing unresolved training deficiencies when necessary.

Related Policies/Documents

H.R.4346 - CHIPS and Science Act

<https://www.congress.gov/bill/117th-congress/house-bill/4346>