

**FACULTY UPDATES:
NEW FEDERAL SPONSORED RESEARCH
REQUIREMENTS & POLICY CHANGES**

Office of Research Services

January 28, 2026

Jennifer O'Hern

Faculty Relations and Operation Excellence Manager



Agenda

- Federal Sponsored Research Funding Updates
 - NIH
 - NSF
 - DOD
 - DOE

NIH Updates



NIH: eRA Commons & ORCID ID

- An **eRA Commons** registration is required for all individuals listed on the grant application and progress reports.
 - [Submit an eRA Commons account request](#)
- **ORCID iD Requirement:** As of Jan. 25, 2026, all senior/key personnel on the application must have an ORCID iD linked to their eRA Commons profile as part of the NIH Common Forms, which are prepared and submitted through SciENcv.

❖ **NIH is aware of some of the technical difficulties that have risen from the move to SciENcv and to eRA Commons and plan to allow for a period of leniency through May 2026**

<https://grants.nih.gov/faqs#/common-forms-biographical-sketch-current-pending-support.htm?anchor=57833>



NIH Policy on Foreign Subawards

- **Effective May 1, 2025**, NIH will not issue subawards to foreign entities (new, renewal, or non-competing continuation). Additionally, NIH will no longer accept prior approval requests to add a new foreign component or subaward to an ongoing project ([NOT-OD-25-104](#)).
- **Effective September 30, 2025:**
 - Foreign collaborations are not nested under the prime award
 - Instead, foreign work will be tracked through linked but independent awards, while scientific progress will still be reported by the prime recipient
 - Applies to all NIH grants and cooperative agreements (new, renewal, and non-competing) to both domestic and foreign entities
 - Does not apply to:
 - Foreign consultants
 - Purchases (unique equipment or supplies) from foreign vendors



NIH Financial Conflict of Interest Disclosure and Training Requirements Before Submission

- **New NIH Requirement (Effective Oct. 1, 2025):**
 - Institutions must provide training on **disclosure of Other Support**. (Policy Notice: [NOT-OD-25-133](#))
 - Training available via Navex Disclosure Management System.
- **PHS-FCOI Disclosure**
 - Required for all senior/key personnel listed on the grant application.
 - Complete through <http://ors.ou.edu/fcoi/fcoireport.asp>
- **Effective May 25, 2026 – Research Security Training**
 - All senior/key personnel must complete the Research and Security training within 12 months prior the proposal submission [NOT-OD-26-017: Research Security Training Requirements for NIH](#)



Other NIH Updates

- **NIH will no longer require Letters of Intent, nor are they accepting them**
- **Unsolicited applications requesting \$500k or more in funding will no longer require prior approval from the program official**
- **NIH is working to simplify their NOFO's to reduce complexity, reducing activity codes, and simplifying the review process efforts. More details will be provided as these changes are finalized.**



NSF Updates



NSF Financial Conflict of Interest Disclosure and Training Requirements

- **New NSF Security Training Requirement (Dec. 2, 2025)**

- All senior/key personnel must complete the Research and Security training within the 12 months **prior to proposal submission.**
- Training available via LMS OnPoint.

- **Conflict of Interest (FCOI/COI) Disclosures Required (Effective Oct. 1, 2025)**

- Required for all senior/key personnel listed on the grant application must disclose any potential conflict of interests in a disclosure at the proposal stage

- **Responsible and Ethical Conduct of Research (RECR) Training**

- Required once the project has been awarded
- Has been in effect since 2023



NSF Project Reporting System and Public Access Repository

- Data Management & Sharing Plan (DMSP) is required for all proposals and must be created using the Research.gov DMSP tool. - Available Apr 27, 2026
 - DMSPs must name specific repositories, include persistent identifiers, and state that data will be shared no later than at the time of publication.
- Author Accepted Manuscripts (AAMs) of peer-reviewed publications must be deposited in the NSF Public Access Repository (PAR) at or before publication. No embargo is permitted.
- The NSF Project Reporting System prohibits direct dataset entry into project reports within Research.gov.

[Policy Notice: Implementation of Policy Changes to Proposal and Award Policies and Procedures Guide \(PAPPG\) 24-1, Supplement 2 | NSF - U.S. National Science Foundation](#)



NSF Biosketch, Current and Pendings, and Disclosures

- Effective May 20, 2024 NSF requires submitted proposals to provide **biosketches and current and pending** funded programs in a specific format through **SciENcv**.
- Through SciENcv you will also certify you have completed the **Research Security Training** and certify that you have no current affiliation with the Malign Foreign Talent Recruitment Program (**MFTRP**).
- **FCOI/COI Disclosure**
 - Required for all senior/key personnel listed on the grant application.

<https://www.nsf.gov/policies/pappg/24-1/ch-2-proposal-preparation#ch2D2h>



DOD Updates



DOD Updates

- As of January 7th, 2025 the Academic Research Memorandum came out with an updated **1268HS List of prohibited affiliates**
 - [Federal Register :: Notice of Availability of Designation of Chinese Military Companies](#)
- DOD is conducting **Research Security Reviews** – where they will be spot checking for policy adherence in existing awards. DOD will be reaching out to the institutions directly if there are any questions
- **Future Changes:**
 - DOD’s long-term goal is to move their Biosketches and Current and Pending to the Common Forms template utilizing SciENcv in the future. A timeline to this transition is not yet available.
 - DOD is also working to standardize how their grant numbers are cited. A policy regarding these changes is forthcoming



DOE Updates



DOE Common Forms for Biosketches and Current and Pending

- **SciENcv Requirement:** As of Jan. 1st, 2026, all senior/key personnel on the application must use SciENcv to generate DOE Biosketches and Current and Pending.
- Through SciENcv you will also certify you have completed the Research Security Training and certify that you have no current affiliation with the Malign Foreign Talent Recruitment Program (**MFTRP**).



DOE Research Security Training Requirements

- **New DOE Security Training Requirement**
 - **Effective May 25, 2025**
 - All senior/key personnel must complete the Research and Security training within the 12 months **prior to proposal submission.**
 - Training available via LMS OnPoint.
- <https://www.energy.gov/ia/research-security-training-requirement>



DOE Data Management Requirement Updates

Data Management Plan (previous)		Data Management and Sharing Plan (FY 26)
<ul style="list-style-type: none">• Scope is “Research Data” to validate research findings	➔	<ul style="list-style-type: none">• Scope is “Scientific Data” to validate and replicate research findings
<ul style="list-style-type: none">• Data underlying publications should be made as accessible as possible	➔	<ul style="list-style-type: none">• Data underlying publications should be made available at time of publication
<ul style="list-style-type: none">• No explicit requirement regarding other research data	➔	<ul style="list-style-type: none">• Timeline for sharing other scientific data is required
<ul style="list-style-type: none">• No explicit requirement regarding repository selection	➔	<ul style="list-style-type: none">• Repository selection should align with <u>NSTC Desirable Characteristics</u> guidance

- Effective April 27, 2026

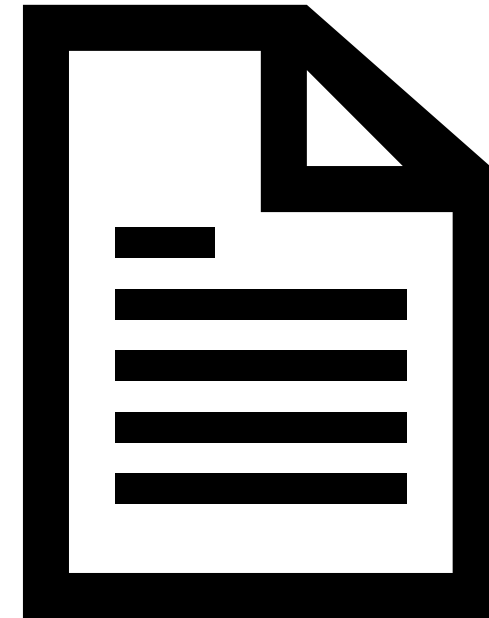
- [Full Text Available:](#)

[DOE Requirements and Guidance for Digital Research Data Management | Department of Energy](#)



DOE Transparency for Foreign Connections

- DOE suggests using their version of a Transparency for Foreign Connections (TFC) form when identifying applicants or subrecipients disclosing work with any foreign entities
- This includes any TFC changes to existing awards
- Download the form at:
www.energy.gov/ia/transparency-foreign-connections



ORS Training Requirements

- The Sponsored Research and Compliance Training
 - Covers eight research-related compliance topics and is required for all faculty and staff involved in sponsored research ([OnPoint](#))
 - Required every 4 years
- CITI Financial Conflict of Interest (FCOI) Training
 - Mandatory for PHS/DOE awardees prior to expenditure of funds
 - Required every 4 years
- NSF Responsible Conduct of Research (RCR) Training Requirements
 - Required for PI's, Sr/Key Personnel, Students and postdoctoral researchers, funded by NSF grants are required to complete online training
- NIH Other Support Training Requirement
 - Effective October 1, 2025
 - The training is available through OU's Navex Disclosure Management
 - All Senior/Key Personnel must complete the training prior to proposal submission.
- <https://www.ou.edu/research-norman/research-services/training>



CoRA for Frequently Asked Questions and Website Navigation



VICE PRESIDENT FOR RESEARCH AND PARTNERSHIPS
The UNIVERSITY of OKLAHOMA

HOME ABOUT ▾ RESEARCH SERVICES ▾ RESEARCH SUPPORT ▾ CORPORATE PORTAL CENTERS & INSTITUTES ▾ NEWS & EVENTS ▾

Office of Research Services

Federal Grant and Assistance Directives FAQ Now Available

In a recent **communication**, President Harroz acknowledged questions and concerns raised by recent federal executive orders and Executive Branch communications related to federal assistance and grants essential to the university's research enterprise. **Additional information is now available online** and will be updated as needed.

The goal of the Office of Research Services (ORS) under the Vice President for Research and Partnerships (VPRP) is to function as a highly trained, customer service-oriented organization whose primary purpose is to support externally funded research and sponsored activities within the university community. ORS has responsibility for pre-award and award administration on the Norman campus and Norman campus-related programs on the Tulsa campus. ORS is the institutional unit authorized by the Board of Regents to submit proposals to and accept awards from external entities for financial support in the form of grants, contracts, and cooperative or other agreements.

For general questions, call the ORS main phone number, (405) 325-4757, or contact us at ris@ou.edu.

Calculate Your Submission Processing Timeline(MM/DD/YYYY):

Quick links

[Submit Proposal Information Sheet](#)

[Cayuse Research Administration](#)

[Staff Directory](#)

[Obtaining Accounts and Registrations](#)



<https://www.ou.edu/research-norman/research-services/research-services-home>



The UNIVERSITY of OKLAHOMA
OFFICE OF RESEARCH SERVICES

Contact Information

- **Research Information Services**
(ris@ou.edu) can answer general questions or direct you to the appropriate person
- **Sogol Rasouli**, Associate Director of Research Information Services
(Sogol.rasouli@ou.edu)
- **Bonnie VanWinkle**, Associate Director, Proposal Services (bvanwinkle@ou.edu)
- **Leslie Flenniken Kelly**, Associate Director of Award Administration
(lflenniken@ou.edu)
- **Jennifer O'Hern**, Faculty Relations and Operational Excellence Manager
(jennifer.ohern@ou.edu)



Thank you!



The UNIVERSITY *of* OKLAHOMA
OFFICE OF RESEARCH SERVICES