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Spring-Summer 2026 Office of Research Policy Newsletter

The Office of Research Policy (ORP) includes Caltech's Office of Research Compliance, Office of Research Security, and the Office of Laboratory Animal Resources. Regulatory Committees supported by this office include the [IACUC](#), the [IRB](#), the [IBC](#), the [RSC](#), and the [HESC](#). ORP also oversees Caltech's Research Security Program, including Conflicts of Interest and Export Control, Caltech's Research Integrity Program, and Caltech's Controlled Substances Program.

This newsletter is issued two-three times per year, highlighting important regulatory changes, changes in Institute policy, and upcoming educational events and committee meetings. It has been a very busy year this year, so this newsletter is a bit longer than usual. Please use the index on the left to navigate to sections that are relevant to you.

Important Grantee Regulatory Updates

This year has been a very busy year for changes in grantee proposals and post award terms and conditions. Please carefully review the highlighted changes.

- Risk Mitigation.** Since 2024, federal agency sponsors have been implementing several changes with regard to mitigating foreign risk. [Dept. of Defense/War \(DoD\)](#), the [Public Health Service \(NIH\)](#), [Dept. of Energy](#) and [NSF](#) have issued their risk assessment frameworks and NASA plans to issue theirs soon. These matrices require implementing processes for reviewing researcher and institutional risk and developing risk mitigation plans. The Caltech process includes review of a researcher's past 5 years of publications, patents, collaborators, co-authors, funding and more. A short slide presentation overview can be found [here](#).
- Publication.** Federal sponsors are becoming increasingly concerned about foreign collaborations giving rise to publications funded by the US. In the past year, the US Government has issued several reports citing US co-authorship or co-funding with Chinese co-authors as evidence of undue foreign influence: DoD - [Fox in the Henhouse | Select Committee on the CCP](#), DoE- [Containment Breach: US DoE Failures in Research Security and Protecting Taxpayer-Funded Research from Foreign Exploitation](#) and NASA- [Research Security for America's Future in Space: NASA's Enforcement of the Wolf Amendment](#). Caltech authors and awards were cited in the DoD report.

We are developing a guidance document to aid you in navigating collaborations and co-authorships which will be available soon. As a general rule, researchers should take care not to include authors (foreign or

EVENTS

IACUC Meetings

June 9, 2026
July 8, 2026
August 12, 2026

IBC Meetings

July 7, 2026
September 1, 2026
October 6, 2026

IRB Meetings

July 10, 2026
September 11, 2026

HESC Meetings

Fall, 2026

RSC Meetings

June 25, 2026

ECLC Meetings

TBD

domestic) who have not contributed substantially to the paper and should not include anyone gratuitously as an author or in the acknowledgements if they have not contributed. Likewise, authors should not cite gratuitously to federal funding if none was used in support of the reported research. Several sponsors have issued new terms and conditions (even on renewals of existing awards) restricting collaborators in foreign countries from conducting or collaborating on research or collaboratively writing a publication stemming from the federally funded research. If you have questions or concerns about your research collaboration, please contact researchsecurity@caltech.edu.

- (3) **Disclosures.** All agencies have implemented a requirement that grantee applicants and awardees complete an annual financial interest and commitment disclosure (see below) and that they appropriately and accurately report appointments and commitment in their Biosketch, and any Other Support as required by their sponsor. NIH issued a requirement for Institutions to have an Other Support Policy and ensure that researchers were aware of their obligations to report other sources, both monetary and in-kind, received for research. Please visit this [Other Support Policy Page](#) and the revised [Transparency in Research Page](#). There have been some updates to the Biosketch and Other Support Application (BSOS) found in access.caltech.edu that may help you and your grants management team to navigate disclosures.
- (4) **Controlled Unclassified Information (CUI) or Export Controlled Data or Items.** Unless previously approved by the Office of the Provost, [Caltech may not receive CUI](#) or Export Controlled Data or Items. Caltech, on campus, does not generate CUI or Export Controlled Data, Items or Research Results. If receipt and use of such materials is approved, it must be used and stored in compliance with US Government cybersecurity requirements, including abiding by the [Cybersecurity Maturity Model Certification \(CMMC\) Program](#) requirements (effective 11/10/25) and University Research Cybersecurity Requirements (Pending).
- (5) **Foreign Travel Reporting Requirements.** Federal awards may have a requirement to report business travel, personal travel, or both, to countries of concern (China-PRC-including Hong Kong, Russia, North Korea, Iran, and others as the list may change) or to all foreign countries, prior to travel. The requirement may apply to senior/key personnel only or to all personnel (including graduate students, postdocs, staff) working on a project. PIs must be aware of their specific reward requirements and ensure compliance. The Office of the Provost must approve travel reporting as a term or condition of award if the requirement includes travel reporting for students and postdocs. Please visit the [International Travel Webpage](#) and/or contact the Office of Research Security (ResearchSecurity@caltech.edu) for guidance.
- (6) **Foreign Person Restriction from Participation on a Project.** Caltech does not accept restrictions on personnel eligible to conduct research. If an award has a restrictive term, Caltech will normally include an additional award term allowing us to terminate the project should Caltech personnel be denied participation. Acceptance of any term restricting foreign personnel from participation must be approved by the Office of the Provost.
- (7) **Training.** Over the last several months multiple agencies have increased their training requirements. Training includes Research Security Training, Conflict of Interest Training, Research Integrity Training, and more. A [Training Matrix](#) is available for researchers to check, by agency for current training requirements.
- (8) **Research Misconduct Policy.** Caltech updated its [research misconduct policy](#) in accordance with federal regulations. The new policy will be used for all cases beginning 1/1/2026 or later.

Conflict of Interest Updates

- (1) **Annual COI Disclosure Period:** Caltech's annual Disclosure of Financial Interests and Commitments (DFIC) submission period for researchers began on June 1, 2026, and will run through June 30, 2026. During this period, all researchers are required to disclose all outside commitments and activities, and, when applicable, financial interests that are or may be perceived as related to their institutional responsibilities. Faculty will notice that the disclosure system changed this year. If you are in need of assistance, please contact caltechcoi@caltech.edu.
- (2) **The DFIC Continues to Accept New Disclosures:** While new disclosures and/or updates to disclosures are accepted, effective July 1, 2026, researchers who have not submitted their initial annual disclosure

have been restricted from submitting sponsored research proposals and PTAs for new awards will not be set up until disclosures are complete for all senior/key personnel.

Import & Export Compliance Regulatory Updates

- (1) **Caltech Openness in Research and Export Control Policies.** Copies of these policies are found [here](#) and in the Faculty Handbook.
- (2) **Personnel Screening and Research Security.** To ensure compliance and safeguard Institute research, all collaborators, visiting scholars, visitors, volunteers, guests and external affiliates, whether domestic or foreign, who are visiting for more than 2 weeks, should be onboarded and screened using the **Visitors Access Request (VAR)** system, found in the access.caltech.edu suite of applications. If you are planning to host a visitor in your lab or with your research group for a short term (less than 2 weeks), you should, at a minimum, run a Restricted Party Screening (RPS). Caltech has a subscription to [Descartes Visual Compliance](#) and anyone with a Caltech email can create, or the Office of Research Security can run an RPS for specific entities.
- (3) **Tariffs.** U.S. Customs processing of tariff waivers for the importation of scientific instruments has been significantly impacted by last year's government shutdown and reductions in the federal workforce. As a result, approval timelines are currently taking approximately eight months. Project teams should plan to submit applications well in advance of their anticipated project need. In the meantime, applicants may choose to pay applicable import fees and seek a refund if the waiver is approved; however, refunds of tariffs are not guaranteed. ORS will provide guidance on the processing of tariff waiver documentation; however, please note: the burden of proof is on the project teams to demonstrate that no instrument of equivalent scientific value for the purposes for which the foreign instrument is to be used is being manufactured in the United States.

Temporary imports should be cleared through our customs broker, PackAir. Other carriers, including FedEx and DHL, do not provide the same level of customs documentation support or customer service, which may result in delays or tariff-related clearance issues. Make sure the foreign shipper identifies PackAir as our broker and marks all shipping documents correctly identifying the shipment as a temporary import.

Refunds related to IEEPA tariffs remain pending with Customs due to high processing volumes and long lead times. Eligible Caltech projects will be contacted by Export Control once additional guidance and refund processing updates become available

- (4) **Wolf Amendment.** Since 2011, as a result of an act of Congress, NASA has been prohibited from funding any work that involves bilateral participation, collaboration, or coordination with the government of China (including Hong Kong or Macau) or any Chinese-owned company or entity, regardless of whether any funds are exchanged. Multilateral activities (involving additional countries) are generally permitted. The US Government has been adding extra emphasis to this requirement of late. To help researchers, a new website was created and can be found [here](#). Also, training has been developed and all NASA PIs and Senior/Key Personnel funded by NASA will be notified and will need to complete this training.

Administrative Committee on Biosafety (IBC, BSOC, and IRE) Updates

- (1) **Training and Personnel Update Reminder:** Caltech ACB reminds all laboratories to ensure their personnel lists are up to date, and personnel are properly trained prior to working in the lab. For more information, please refer to the [EH&S Researcher Training Matrix](#)
- (2) **Protocol Application System (IBC PAS).** We are pleased to announce the upcoming launch of the electronic IBC PAS, which will make it easier for investigators and lab personnel to submit, track and manage IBC, BSOC and IRE applications. The ACB will be reaching out to labs soon with detailed information regarding system access, onboarding timelines, and training resources.

IRB Updates

- (1) **Exempt Protocols:** IRB PIs with approved exempt studies were recently sent a notice requesting a review of their exempt protocols. PIs have been asked to confirm whether each exempt study remains active or should be closed. As soon as possible, PIs should notify the IRB Administrator at irb@caltech.edu with the status of all exempt protocols to ensure records remain accurate and up to date.
- (2) **AI in Human Subjects Research - Guidance Coming Soon:** The IRB is currently developing campus guidance to help investigators navigate the use of AI in human subjects research. More information and resources will be shared with the campus community in the coming months. In the meantime, investigators planning to use AI tools in human subjects research are encouraged to consult with the IRB early in the study design process.
- (3) **DOJ Bulk Data Transfers:** The Department of Justice (DOJ) introduced a new rule limiting bulk transfers of sensitive U.S. personal data to “countries of concern” to address national safety risks. The rule focuses on categories such as genomic, biometric, health, financial and geolocation data, and imposes new restrictions and compliance obligations on institutions handling these transfers. Refer to Caltech’s [webpage](#) for guidance.
- (4) **Standard Operating Procedure (SOP) Updates:** Investigators and staff involved in human subjects research at Caltech should familiarize themselves with the IRB Policy found on the [IRB website](#) and the IRB SOPs found through the [SOP Repository](#) in the IRB Protocol Application System (PAS) or the [IRB website](#).

HESC Updates

ISSCR Guidelines for Stem Cell Research: The International Society for Stem Cell Research (ISSCR) Guidelines provide widely recognized ethical and scientific standards for stem cell research, including research involving human embryos, embryo models and genome editing. Investigators conducting work with embryo models or related technologies should review the updated [ISSCR guidance](#) and ensure appropriate oversight is in place when preparing protocols for HESC review.

IACUC and OLAR Updates

OLAR and the IACUC are preparing for the triennial accreditation site visit from the American Association of Laboratory Animal Care (AAALAC). Since 2002, Caltech’s continued AAALAC accreditation status has confirmed that we provide excellent animal care to facilitate our rigorous, innovative science.

The AAALAC site visitors will visit all vertebrate animals and cephalopod housing and procedure spaces, including laboratory spaces where animals may be present. It will be important to have a laboratory representative available to tour the site visitors and discuss animal-based research during the on-campus visit. The IACUC and OLAR staff will coordinate visits to laboratory spaces as soon as the dates are scheduled in fall 2026.

Research Safety Updates (from the Office of Environmental Health and Safety- EH&S)

- (1) **Updated Research Safety Manuals.** Caltech EH&S provides written safety programs to support safe research and to meet regulatory requirements. The [Biosafety Manual](#), [Chemical Hygiene Plan](#), [Laser Safety Manual](#), and the [Radiation Safety Manual](#) have been recently updated.
- (2) **Laboratory Hazardous Waste Training.** A reminder that hazardous waste training is required for SFP students and new researchers working in labs that generate hazardous chemical waste. This training is also required for all [Faculty](#) with laboratories that generate hazardous chemical waste. This mandatory training is individually tracked and completion rates monitored; contact safety.training@caltech.edu or call x6727 for any questions about how to access this online training.
- (3) **Updated Hydrofluoric Acid Procedures.** The Standard Operating Procedure (SOP) and all emergency

procedures have been updated for work involving [hydrofluoric acid](#) (HF). Safety has also developed an “HF kit” to help labs address potential emergencies. For labs using HF, please contact safety.training@caltech.edu to obtain an “HF kit”.

- (4) **Guidance on use of Glass Waste Boxes:** The blue cardboard glass waste boxes are very common in Caltech labs. To avoid improper disposal of hazardous materials, EH&S has developed a simple one-page fact sheet about what is acceptable to dispose of in the blue glass waste boxes. Laminated versions of this fact sheet ideal for posting in the lab are available in the EH&S Office by calling x6727 or visit us in Spalding B125. See this [Glass Disposal Cardboard Boxes](#) guidance.
- (5) **Laboratory Service Provider Safety Guide:** To assist labs that hire 3rd party service providers for maintaining/fixing lab equipment, EH&S has developed safety guidelines for the lab and the 3rd party to follow. These [Guidelines](#) are to be used for any 3rd party contract work being performed in your lab.
- (6) **Regulatory Efforts:** EH&S wants to thank the research community for your partnership in recent regulatory initiatives, including a California Department of Public Health campus inspection, fluorinated gas use assessment, and dichloromethane exposure monitoring. If your lab uses fluorinated gases and/or dichloromethane and has not yet worked with EH&S, please reach out to safety@caltech.edu

Library Updates

NSF is implementing a new data management and sharing plan (DMSP) template, a webform on [research.gov](https://www.research.gov), to replace the 2-page narrative data management plan submitted with a grant application.

Proposals submitted on or after April 27, 2026 should use the new webform. The webform is directorate-specific. [A preview of the webform](#) and instructions have been released by NSF. From the preview, we know that:

There are eight questions on the webform:

1. Data or Research Product Category General Information
2. Access Policies and Limitations
3. Data Standards and Metadata
4. Data or Research Product Provenance
5. Public Archiving
6. Timeline for Public Accessibility
7. Data Availability
8. Accountability

Questions will be formatted as follows:

1. Questions 2-8 are repeated for each data category identified in question 1.
2. Questions answers may be selected from a drop-down list, with the ability to "add new" if a suitable answer is not provided in the drop-down.
3. Most questions have a description field; "add new" categories will require more free-text description than drop-down categories.

NIH is also updating its data management and sharing plan (DMSP) template. The required format is changing to a structured template instead of a two-page, narrative document.

The new template must be used for grant applications submitted on or after May 25, 2026. This policy update only affects the DMSP template and does not change existing data sharing requirements from the 2023 NIH Data Management & Sharing Policy.

Caltech Library has created updated NIH DMSP resources:

- [Guidance on NIH DMSPs](#)
- [Caltech example NIH DMSPs](#)

If you have any questions about the new DMSP template or questions about data management and sharing generally, please reach out to library@caltech.edu.

The library is able to automatically generate publication collaborator reports, including the NSF COA form. Email library@caltech.edu if you're working on a NSF grant and need a COA report on your co-authors.

Keeping your ORCID profile up-to-date is the easiest way to maintain your publication list. If you've set up your ORCID correctly, publications can automatically get added to your profile by publishers. The library can also use your ORCID profile to populate CaltechAUTHORS. Email library@caltech.edu if you need assistance setting up your ORCID profile.

The Caltech Library can assist with questions about public access to articles and research data, as required by many federal funding agencies. The library developed [guidance on the NIH Public Access Policy](#) and has a short list of [publisher policies around immediate public access](#). For questions about public access requirements, email library@caltech.edu. Additionally, the following services are provided by the library and open to the Caltech research community:

- [General Grant Support](#): ORCID, collaborator reports, data management, SciENCv, etc.
- [Support managing ORCID accounts](#) for identity management and grant compliance.
- [Open Access Publishing Support](#): Publish manuscripts Open Access (OA) for free or at a discount through the Caltech Library's agreements with several publishers.
- Consultations with [Subject Librarians](#) to help determine appropriate manuscript version to submit and submission process - email library@caltech.edu.
- [CaltechAUTHORS](#) can track open access status, personal and document identifiers, and other needed metadata.
- [CaltechDATA](#) can provide storage, manage public access, assign DOIs, and other services.
- [Research Data Support](#): Consultations with Librarians for guidance on general data management and preservation, Data Management & Sharing Plans (DMSP's), and more.

Our Team & Collaborators

- [Grace Fisher-Adams](#) – Associate Vice Provost for Research Policy and Compliance
- [Marlene Lopez](#) – Administrative Assistant
- [Megan Hayashi](#) – Interim Director of Research Compliance / IRB & HESC Administrator
- [Amy Chang](#) – IACUC Administrator
- [Tiffani Cheung](#) – IBC & RSC Administrator / Training Coordinator
- [Galia Bar-Sever](#) – Interim Research Compliance Administrator
- [Rachel Smith](#) – Director of Research Security
- [Mel Dereje](#) – COI Manager
- [Teresa Recinos](#) – Export Compliance Manager
- [Karen Lencioni](#) – Director of OLAR / Attending Veterinarian

- [Nathan Siladke](#) – Director of Research Safety
- [Manali Doshi](#) – Institute Biosafety & Biosecurity Officer

- [Adriana Popescu](#) – University Librarian