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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 Awardees 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.

- (1) **Risk Mitigation.** Since 2024, federal agency sponsors have been implementing several changes with regard to mitigating foreign risk. [Dept. of War/Defense](#), 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](#).
- (2) **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/DoW- [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 have put together a Collaboration Guidance [Website](#) for Caltech Researchers to aid you in navigating collaborations, co-authorships, and reporting obligations associated with collaborations. As a general rule,

EVENTS

IACUC Meetings

August 11, 2026
September 8, 2026
October 13, 2026

IBC Meetings

September 1, 2026
October 6, 2026
November 3, 2026

IRB Meetings

September 11, 2026
November 6, 2026

HESC Meetings

TBD

RSC Meetings

TBD

EL&RS Meetings

August 25, 2026
November 23, 2026

researchers should take care not to include authors (foreign or 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) **Foreign Component.** PHS/NIH has issued a reminder of the [definition of Foreign Component](#), reminding investigators that collaborations with investigators at a foreign site *anticipated to result in co-authorship* could be a foreign component, which requires prior approval.
- (4) **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 our [Other Support Policy](#) and the revised [Transparency in Research](#). 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.
- (5) **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).
- (6) **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.
- (7) **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.
- (8) **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. All Caltech PIs and Senior/Key personnel on NASA awards are now required to take training on the Wolf Amendment. A [Training Matrix](#) is available for researchers to check, by agency, the current training requirements.
- (9) **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 ran through June 30, 2026. During this period, all researchers were required to disclose all outside commitments and activities, and, where applicable, any financial interests that are or may be perceived as related to their institutional responsibilities. If you have not completed your disclosure and 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 year round, effective July 1, 2026, researchers who have not submitted their initial annual disclosure are restricted from submitting sponsored research proposals and PTAs for new awards will not be set up until disclosures are complete and any FCOI are managed for all senior/key personnel.
- (3) **Department of Energy has New Disclosure Requirements:** Effective August 17, 2026, *proposal applications submitted* to DOE for funding and new awards will be subject to the [new disclosure requirements](#). We are developing guidance for researchers which will be available soon. We will update this newsletter, online, to include a hyperlink to Caltech's guidance.

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.
- (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 have been notified and will need to complete this training.

Administrative Committee on Biosafety (IBC, BOC, 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).** The Caltech electronic application for IBC is now live. The IBC will reach out to research labs to with upcoming protocol renewals to provide orientation and assist with first time use.
- (3) On July 20, 2026, the US Government issued the [US Government Policy for Stopping High-Risk Life Sciences Research](#) which covers Dangerous Gain of Function and International Research of Concern life sciences research. This policy is directed toward federal agencies who should issue guidance to grantees and contractors within 120 days. We anticipate rapid implementation of these requirements and will provide notice to all researchers holding a Caltech IBC protocol as soon as such requirements are available.

IRB Updates

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.

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.

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.

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 Training Guidance.** Caltech EH&S provides required safety training to our research community. Since training requirements are determined by the work being done in the lab, EH&S has updated the [Safety Training Matrix for Laboratory Personnel](#) to clarify these requirements. This training matrix can be found under the Training – Opportunities and Manuals, Forms, & More tabs on the [Safety website](#).
- (2) **Laboratory Hazardous Waste Training-Required for Faculty.** Annual Laboratory Hazardous Waste Training is required for all Faculty (as well as their researchers) with laboratories that generate hazardous chemical waste. This training is required by federal law under the Resource Conservation and Recovery Act (RCRA) regulations. If there are questions about how to access this online training, please contact EH&S at safety.training@caltech.edu or by calling x6727.
- (3) **New Safety Fact Sheets on Vacuum Pump Safety and Syringe Safety.** EH&S has developed simple one-page guides (fact sheets) on [vacuum pump safety tips](#) and [syringe selection](#) to better inform the research community on best practices for this common lab equipment. These can both be found on the [Research Safety](#) tab on the [Safety Website](#).
- (4) **Updated Safety Website Landing Page.** The Safety website has been updated to simplify the administrative work for submitting incident reports. Incident reports are submitted **AFTER** emergencies have been reported to Caltech Security at x5000 and Security has responded to address the issue.

The Quick Links section of the website landing page have also been updated so researchers, especially Lab Safety Coordinators, can easily find the [NFPA form](#) to update signage posted outside all Caltech labs. A common NFPA form update is the Lab Safety Coordinator contact information, which is required anytime there is a change in that position and essential should an emergency occur.

Library Updates

NSF is implementing a new data management and sharing plan (DMSP) template, a webform on 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.

The Caltech Library will provide more information about the new NSF DMSP template when it becomes available. 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 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](#) – 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
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- [Adriana Popescu](#) – University Librarian
 - [Nathan Siladke](#) – Director of Research Safety
 - [Manali Doshi](#) – Institute Biosafety & Biosecurity Officer