

To: Mark Rickenbach, Interim Associate Vice Chancellor for Research Policy & Integrity

From: Stefani Buster, Director Research Security and Export Control Program

Re: Definition of Covered Individual to be Used by the Research Security Program for Federal Training and Certification Requirements

Date: 3/21/2025

Background

Beginning in 2021, an interdisciplinary task force convened by the Office of the Vice Chancellor Research (OVCR) began preparing for the implementation of a research security program to meet the federal [National Security Presidential Memorandum 33 \(NSPM-33\)](#) and the [CHIPS & Science Act](#) training and certification requirements.

On July 9, 2024, the White House Office of Science and Technology Policy (OSTP) released [Guidelines for Research Security Programs at Covered Institutions](#). The guidelines require the university to provide training to covered individuals. To provide clarity, the guidelines adopted the CHIPS & Science Act definition of covered individual.

Requirements

The guidelines require training for covered individuals for the purposes of complying with NSPM-33 and the CHIPS & Science Act. The OVCR prepared a definition of a covered individual to best serve the needs of the University of Wisconsin-Madison and meet these specific federal requirements. This memorandum establishes the definition of covered individual and by extension allows staff to identify who needs to be trained.

Definition of Covered Individual

A covered individual means an individual who:

- (A) contributes in a substantive way to the scientific development or execution of an R&D award carried out with support from a federal research agency; and
- (B) is designated as a covered individual by the federal research agency concerned.

Covered individual includes (but is not limited to) any of the following:

- Principal Investigators/Project Directors
- Co-investigators
- Individuals listed as Senior Personnel/Key Personnel
- Postdoctoral Researchers/Associates
- Graduate Students and Undergraduate Students

The definition of covered individual can also vary depending on the federal funding agency or award specific language.

Questions regarding the definition of covered individuals and the research security requirements may be directed to the [Office of Research Security and Export Control](#) and [Research and Sponsored Programs](#).