



## Frequently Asked Questions on the Policy on Sensitive Technology Research & Affiliations of Concern (STRAC)

If your question is not answered by this document, or on the Government of Canada STRAC Q&A page, please contact the Research Security Division at [researchsecurity@ucalgary.ca](mailto:researchsecurity@ucalgary.ca).

*This FAQ was updated on November 5<sup>th</sup> 2024 to reflect additional research security guidance released by the Tri-Agencies and Canada Foundation for Innovation (CFI). Updated text is indicated in red.*

### **Which Funding Calls Are in Scope of STRAC?**

Q: Which grant funding programs are in scope of the new STRAC policy, as of May 1, 2024?

Granting Agency	Program
Canadian Institutes of Health Research (CIHR)	<ul style="list-style-type: none"> <li>- All (except for the Institute Community Support Program, Café Scientifique, Travel grants, Planning and Dissemination grants, Capacity Building Workshops, Knowledge Synthesis grants, and Prizes)</li> </ul>
National Sciences & Engineering Research Council of Canada (NSERC)	<ul style="list-style-type: none"> <li>- Innovation grants (including Alliance)</li> <li>- Discovery grants</li> <li>- Training, promotion &amp; prizes</li> </ul>
Social Sciences & Humanities Research Council (SSHRC)	<ul style="list-style-type: none"> <li>- Insight Research grants</li> <li>- Research Partnership grants</li> <li>- Strategic and Joint Initiative grants (where STRAC is referenced in the funding call)</li> <li>- Impact Wards</li> <li>- New Frontiers Research Fund</li> <li>- All Canada Research Chairs, Canada Excellence Research Chairs, and the Canada First Research Excellence Fund</li> </ul>
Canada Foundation for Innovation (CFI)	<ul style="list-style-type: none"> <li>- All (except for the College Fund)</li> <li>- Innovation Fund (2025 and beyond)</li> </ul>

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Q: Does the STRAC policy apply to foreign talent and recruitment programs?

A: No, foreign talent and recruitment programs are not in scope of the STRAC policy. However, STRAC would apply if participation in a foreign talent program led to a researcher becoming affiliated with, and/or receiving financial or in-kind support from a named research organization.

***How Will STRAC Affect Me & My Research Team?***

Q: When will the policy requirements come into effect?

A: The policy will apply to all federal granting calls announced on or after May 1, 2024.

This means that on or after May 1, 2024, if you are conducting research in an area that is advancing a sensitive technology listed in the policy, you will need to ensure that your affiliations with any of the named research organizations are severed before applying for federal grant funding.

Q: The STRAC policy applies to my research. What should I do?

A: If the STRAC policy announcement impacts your research, reach out to [researchsecurity@ucalgary.ca](mailto:researchsecurity@ucalgary.ca). The Research Security Division will advise you on next steps for how to remain compliant with the new requirements.

Q: Which applicants are considered to have a “named role” on the grant application?

A: The named roles on an application can vary across granting agencies.

For the STRAC Attestation form, participants with named roles on an application includes the nominated principal applicant, applicants, co-applicants, and knowledge users. Collaborators are considered to have a named role for NSERC and SSHRC applications, but not for CIHR applications.

The definition of collaborators for the Tri-Agencies is as follows:

- **NSERC:** Collaborators may take part in a research team but will not have access to grant funds. They must be qualified to undertake research independently and will be expected to contribute to the overall intellectual direction of the research project or program of research.
- **SSHRC:** An individual, participating in a grant application, who may make a significant contribution to the intellectual direction of the research or research-related activity, and who may play a significant role in the conduct of the research or research-related activity.
- **CIHR:** An individual whose role in the proposed activities is to provide a specific service (e.g., access to equipment, provision of specific reagents, training in a specialized technique, statistical analysis, access to a patient population, etc.)
- **CFI:** Each project/team leader and team member that is named on the proposal.

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Q: I received funding for a grant application aiming to advance a sensitive technology research area. I will be recruiting HQP (undergraduate and graduate students, post-doctoral researchers, and research staff) to work on the project. Will they need to comply with STRAC?

A: Yes, all research team members – including all HQP – involved in activities funded by the grant aiming to advance a sensitive technology research area are individually responsible for ensuring that they are not affiliated or receiving any in-kind support from an NRO for the duration of their involvement with the project.

Q: Will I be held accountable for the attestations of colleagues?

A: No, a named applicant will not be liable if an attestation of another research team member is found to be inaccurate.

Each team member is responsible for the validity of their own attestation. The named applicant will be required to collect and submit all completed attestation forms on behalf of research team members with named roles in the grant application as part of the application package.

Research team members and HQP are individually responsible for ensuring that they do not hold an active affiliation or receive funding or in-kind support from an NRO. PI's are encouraged to verify that their HQP are in compliance with STRAC. A STRAC overview document explaining team members responsibilities under STRAC, as well as a UCalgary attestation form, is available to PIs for those team members not named on the grant application.

Q: I am applying for funding that advances a sensitive technology research area. A potential member of the research team has previously studied at a named research organization (NRO). Are they eligible to participate in the research project?

A: Yes, they would be eligible to participate in the research project.

Studying at an NRO in the past does not constitute an affiliation. The researcher would only be considered affiliated with the NRO if they are employed, appointed, currently conduct research at the NRO, or receive in-kind support (including, but not limited to) goods, equipment, monetary benefits, or the use of facilities, software, technologies, or databases.

Q: How would STRAC apply to a graduate student that previously attended a named research organization (NRO), but now attends a Canadian institution? What if a student or post-do coming to Canada has completed their degree at an NRO but has forthcoming publication with co-authors at the NRO?

A: If the student or postdoc is joining a project supported by a federal grant that is advancing a sensitive technology research area (STRA), they should no longer be affiliated with or be involved in any further research with the NRO at the time of beginning their post-doc in Canada. This includes any further research with the NRO that would contribute to forthcoming publications.

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However, forthcoming publications by the post-doc would not contradict STRAC if the publication is the product of past research that was conducted under a past affiliation that is no longer held by the individual.

Q: Does STRAC apply to federally funded student sponsorships, fellowships, and internships?

A: No, the STRAC policy only applies to federal grants (Tri-Agency and CFI) that fund university-based research. Sponsorships, internships, and fellowships are not currently in scope of STRAC.

Q: Does STRAC apply to the funding practices of federally funded third party research organizations?

A: Currently, STRAC only applies to federal grant applications from universities and university-affiliated research institutions.

However, the Government of Canada has directed third-party organizations to take complimentary measures to identify, assess, and mitigate risks to Canadian research and innovation. The government will update the Guidance for Research Organizations and Funders on Developing a Research Security Plan in mid-2024 to reflect these new directives.

Q: My successful Canada Foundation for Innovation (CFI) grant is in scope of the STRAC policy. The funding is for a large infrastructure project that will be used by more than just my own research team. Who needs to comply with STRAC?

A: Only the funding applicants and research team members are subject to requirements under the STRAC policy. While institutions are encouraged to take adequate security measures, no other users of the research infrastructure are subject to requirements under the STRAC policy. CFI will release additional information in Fall 2024 clarifying who must remain in compliance with STRAC.

***What Do I Need to Know About the List of Sensitive Technology Research Areas?***

Q: How do I know if my project is advancing a sensitive technology research area or merely using an existing technology?

A: Your research advances a sensitive technology research area (STRA) if it supports the generation or discovery of knowledge that contributes to progress in the development of listed technology. The STRAs are composed of 11 high-level technology categories. The subcategories identify the sensitive technology research areas of concern.

Q: My federally funded grant will support multiple research projects, but only one project will advance a sensitive technology research area. Am I required to identify my project as advancing a sensitive technology research area?

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A: Yes, you must identify any project supported by the grant that aims to advance a sensitive technology research area listed by the STRAC policy.

Q: What if the nature of my research evolves such that my funded project now involves advancing a sensitive technology research area? This was an unanticipated development and not identified on the initial grant application.

A: Should your research evolve to advance a sensitive technology research area during the lifecycle of the research project, you will be required to inform the relevant granting agency.

Team members will be asked to submit an attestation that they are not affiliated with or receiving in-kind support from a named research organization. This applies regardless of whether an attestation was required with the initial grant application.

Q: I am applying to CFI funding. How can I tell whether research infrastructure is advancing a sensitive technology research area?

A: While the research infrastructure itself is unlikely to advance a sensitive technology research area, the research it supports can potentially do so.

If one or more of the research projects that uses the research infrastructure aims to advance a sensitive technology research area, then the policy applies, and the project/team leaders and team members will be required to provide attestation forms.

Q: I am applying for funding from MITACS and my research involves advancing a sensitive technology research area. Does STRAC affect my grant application?

A: No, only funding applications submitted to NSERC, CIHR, CFI or SSHRC are in-scope of the policy.

However, MITACS is developing their own research security requirements that the applicant will need to adhere to. We expect these future requirements to mirror those of STRAC. If you are unsure what is required, reach out at [researchsecurity@ucalgary.ca](mailto:researchsecurity@ucalgary.ca) for guidance.

### ***What Do I Need to Know About the List of Named Research Organizations?***

Q: What is an affiliation?

A: Individuals are considered affiliated with any organization where they are employed, appointed, or conduct research at that organization. Receipt of financial or in-kind payments also creates an affiliation.

Only current affiliations are in scope of policy requirements. In cases where individuals hold multiple affiliations, all must be identified and considered when ensuring compliance with this policy.

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Q: What is in-kind support?

A: In-kind support refers to any monetary or non-monetary contributions, that include but are not limited to goods, equipment, materials and supplies, professional services, use of facilities (laboratories), software, technologies and databases.

Q: In what instance do I need to terminate an affiliation with a restricted entity?

A: If you have an affiliation with a named research organization and your proposed research will not advance a sensitive technology research area, no further action is required.

If you have an affiliation with a named research organization and your proposed research will advance a sensitive technology research area — or if you plan on joining a team whose research is advancing a sensitive technology research area — you should take action to terminate or wind down those relationships prior to applying for a federally funded grant.

Q: I have severed my affiliation with a named research organization to remain eligible for federal funding that would advance a sensitive research area. How should I document the termination of my affiliation?

A: Researchers are encouraged to document any email correspondence or other communications that would demonstrate the severing of the affiliation should verification be required at a future date. The Research Security team would be happy to discuss this with you on a case-by-case basis. Please reach out to [researchsecurity@ucalgary.ca](mailto:researchsecurity@ucalgary.ca) to arrange a meeting.

Q: I am applying for funding that advances a sensitive technology area and I am affiliated with a named research organization (NRO). How long do I have to end my affiliation with the NRO?

A: If you need to terminate a relationship with an NRO to remain eligible for federal funding, ties must be severed prior to applying for federal funding (in cases where an attestation is required) when applying for funding on or after May 1, 2024. Individuals should follow the best practice of keeping records that demonstrate their past affiliations have been terminated.

If you need assistance terminating your affiliation, contact the Research Security Division at [researchsecurity@ucalgary.ca](mailto:researchsecurity@ucalgary.ca) for guidance.

Q: Will I be penalized for a prior, now-inactive, relationship with a restricted entity?

A: No, only currently held affiliations and financial or in-kind support will be considered. Past affiliations and previous financial or in-kind support will not be considered.

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Q: Am I required to inform the university of my affiliations with restricted entities?

A: No, you are not required to report any affiliations to the University.

If you are working in a sensitive research area and you suspect that you are affiliated with a restricted entity and are applying to a NSERC, CIHR, CFI or SSHRC grant, then you will need to complete the attestation.

The Research Security Office will provide you with guidance to complete the attestation and answer any of your questions. Please contact [researchsecurity@ucalgary.ca](mailto:researchsecurity@ucalgary.ca) for assistance.

Q: I am co-authoring with someone from a named research organization (NRO). Does this make me affiliated with the NRO by association?

A: No, co-publishing with someone affiliated with an NRO does not make you affiliated. You are only considered affiliated with an NRO if you are currently employed, appointed, or receive in-kind support from that organization.

Q: I am co-authoring with someone from a named research organization (NRO) on research that was supported by a federal grant that is in scope of STRAC. Is this permitted by the STRAC policy?

A: No, the inclusion of a co-author who is affiliated with an NRO in a publication on research that is supported by a federal grant to which STRAC applies would be considered a breach of policy. To comply with the policy, the researcher should cease any involvement in research activities funded by the grant before becoming affiliated with an NRO.

### ***What Do I Need to Know About Validation & Enforcement of the Policy?***

Q: How will these new requirements be enforced?

A: Both the funding agencies and the Research Security Division will conduct verifications on grant applications. If either uncovers information that suggest the research project was not accurately identified as advancing a STRA, or that a research team member may have knowingly or unknowingly misrepresented their affiliation, Research Security will contact the PI to schedule a meeting to discuss these findings. The funding agency validation process also includes engaging with Public Safety Canada and subject matter experts when required.

Q: What if an attestation is found to be inaccurate?

A: If the validation process uncovers inaccurate information as part of an attestation form, this may impact the researcher's eligibility to participate in the research activities supported by the grant. This could also result in funding for the project temporarily or permanently ceasing.

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Should a misrepresentation be suspected or alleged, the researcher's institution will be responsible for conducting an inquiry and (if warranted) an investigation of the allegation following the *Responsible Conduct of Research* process.

If the allegation involves a researcher based at a foreign institution, the Canadian institution where the grant is held will be responsible for conducting an inquiry, which could result in the researcher's exclusion from the project.

Q: My application was referred for a national security assessment and I don't understand why. What are the factors that led to this decision?

A: An application will be referred for a security assessment when the application involves a sensitive research area, and a partner organization is associated with countries that are subject to sanctions and/or associated with criminal and ethical concerns.

If an application is referred for a security assessment, any relevant information (including the outcome of the decision) will be communicated via a decision letter to the PI named on the grant application. Any classified information will be omitted from the letter.

Q: My application was declined due to national security concerns. What recourse do I have?

A: A grant applicant can request a meeting with granting agency representatives should their application be declined due to national security concerns, or should their funding be conditional on implementing additional risk mitigation measures.

The applicant may also wish to consult with personnel from their regional Research Security Center to discuss the factors that led to the decision or reach out to the UCalgary Research Security Division at [reserachsecurity@ucalgary.ca](mailto:reserachsecurity@ucalgary.ca) to discuss the best path forward.

Q: Is the researcher or the postsecondary institution accountable for ensuring the accuracy of attestations?

A: In cases where attestation forms are required as a mandatory component of a grant (i.e. if the grant is identified by the applicant to be advancing a sensitive technology research area), institutions must verify that all required attestation forms are complete and included in the application.

Institutions are not responsible for validating the information provided on every form, since every team member is individually responsible for the validity of their own attestation. However, it is the role of postsecondary institutions to support best efforts and due diligence by all involved with the grant application.



### **How Will STRAC Impact My Existing Grant-Funded Projects?**

Q: Will the policy apply to grant-funded projects that are already in progress?

A: No, the policy will not affect any grant-funded projects that are already in progress.

Any grants that have already been awarded and that are ongoing, including multi-year projects where the notice of decision was communicated prior to this guidance being published, will not be affected by this policy.

If a project is being considered for renewal that requires an application for additional funding, the project must comply with this policy. Renewals without additional funds will not be considered under this policy.

Q: How should I proceed when applying for a grant extension with additional funding?

A: While the policy does not apply retroactively to previously awarded grants, the exception is if the applicant applies for an extension with additional funding for a previously awarded grant. If the additional funds provided through this extension would support research activities advancing a sensitive technology research area, attestation form(s) will be required with the extension application documents. If the extension with additional funds is approved, the research team will be required to comply with the policy for the remainder of the grant's duration.

***The National Security Guidelines for Research Partnerships (NSGRP) were applied to NSERC's Alliance grants program in July 2021. Applicants with one or more private sector partners are required to submit a Risk Assessment Form with their application. The Government of Canada provided updated guidance on NSGRP requirements on March 28, 2024 and is gradually expanding the requirement for the completion of a Risk Assessment Form to additional funding programs. NSGRP will apply to the CIHR Project Grant Program starting with the Fall 2024 competition and currently applies to the SSHRC Canada Biomedical Research Fund (Stage 2).***

Q: Does STRAC replace the National Security Guidelines for Research Partnerships?

A: No, STRAC builds on the National Security Guidelines.

All researchers are encouraged to protect their work by using the National Security Guidelines for Research Partnerships to assess and mitigate risks associated with any potential research partnership.

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Q: How will Risk Assessment Forms for Research Partnerships be validated by the Government of Canada?

A: For cases where a Risk Assessment Form must also be submitted, validation will happen in parallel for applications that are referred to national security departments and agencies for assessment. In these cases, validation will occur prior to a funding decision is made.

Q: In cases where both STRAC and the NSGRP are in scope (due to the project advancing a sensitive technology area and involving one or more private sector partners), are the private sector partners named on the grant application required to sign the STRAC attestation in their capacity as collaborators?

A: Yes, if the research project aims to advance a sensitive technology research area, an attestation form is required from all listed applicants, co-applicants and collaborators, including private sector collaborators contributing to activities supported by the grant.

Q: Does the NSGRP apply to projects funded by the Canadian Foundation for Innovation (CFI)?

A: Yes, the NSGRP requirements apply to the CFI Innovation Fund (2023 and beyond), Northern Fund, Canada Biomedical Research Fund (Stage 2), Exceptional Opportunities Fund, and unaffiliated James R. Evans Leaders Fund (as of June 25, 2024). The NSGRP does not currently apply to the College Fund, affiliated James R. Evans Leaders Fund, and the Major Science Initiatives Fund.

The NSGRP requires a Risk Assessment Form and Private Sector Identification Form if the CFI funded project involves a private sector partner that has an active role in the research activities described in the proposal, houses part or all of the research infrastructure, or contributes more than \$500,000 to the infrastructure through cash or in-kind contribution to any single item.