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Office of the Vice President for Research and Creative Scholarship
Todd Building 306
University of Montana
Missoula, Montana 59812-4104

October 26, 2026

Dear Colleagues,

I am writing to share a change in federal policy that affects how we prepare and submit federally funded research proposals in the life sciences — and to ask for your partnership as we adapt to it.

This summer, the federal government issued new rules governing high-risk life sciences research, under the U.S. Government Policy for Stopping High-Risk Life Sciences Research. These rules are in effect now, with full institutional compliance expected by January 2027.

The policy defines life sciences research broadly: research pertaining to the study or use of living organisms, viruses, or their products, including all disciplines, methodologies and applications of biology. That includes biotechnology, genomics, proteomics and bioinformatics. It also includes funding to build research capacity or infrastructure, such as constructing or renovating laboratories. The rules apply to all life sciences research, not only work in high-containment laboratories.

This affects faculty, staff, postdoctoral researchers and students at the University of Montana and our affiliated campuses, UM Western and Montana Tech. It reaches any investigator whose work involves living organisms, viruses or their products, including laboratory, field, animal, environmental sampling, biomedical and computational biology projects. If you are not sure whether your work falls under the definition, please ask us.

The policy also applies regardless of funding source. Because UM receives federal life sciences funding, we are required to review all life sciences research at UM and its affiliated campuses, whether it is federally funded, internally funded, privately funded or otherwise supported.

The most consequential change is when compliance happens. Under the new rules, review moves to the front of the proposal process rather than the end. Going forward, every life-sciences proposal will need a written investigator attestation and an institutional screening before it can be submitted, and any project that raises a gain-of-function or international-research concern must go through a risk-benefit review by the Institutional Review Entity (IRE) Committee before the proposal can go out.

Within life sciences research, the policy also gives particular attention to international work. These requirements apply to federally funded life sciences research: work that involves collaborators, sub awardees or partners outside the United States, research conducted abroad, foreign funding or in-kind support, or data, materials or specimens obtained from outside the United States — particularly anything involving countries or entities the federal government has identified as of concern — may raise an international-research concern and call for additional

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review. This does not mean such work cannot proceed; international collaboration remains central to our mission. It does mean these elements need to be identified early, so that we can coordinate the necessary review with our research security and export-control colleagues. If your federally funded life sciences project has an international dimension, please tell us as early as possible.

This requires a genuine change in our submission culture. Because the review has to be completed before a proposal is submitted — not corrected afterward — we can no longer treat a proposal as “ready” the night before the deadline. Federal life-sciences proposals will need to reach the Office of Sponsored Programs and Research Compliance earlier, with real lead time built in.

Here is what I most want you to hear: for the large majority of you, this is not a new hurdle. Most proposals will clear the screening quickly. The single most helpful thing you can do is engage our office early — the sooner we know about a proposal, the more smoothly we can help you get it submitted on time. Bring us in early, and we will make it work.

Our research administration and compliance teams are ready to help you navigate these requirements. If you are planning a federal life-sciences proposal, please reach out to the Office of Research and Creative Scholarship as early in your planning as possible. We will share additional guidance and resources as federal agencies issue their implementation details.

Thank you for the care you bring to your research, and for your partnership as we adapt to these new requirements together.

Sincerely,

DocuSigned by:
Paul M Lukacs
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Paul Lukacs
Interim Vice President for Research and Creative Scholarship
University of Montana