

Identifying all Sources of Support in Proposals for External Funding

Federal sponsors are focusing more closely on the full disclosure of project support than in years past. There is concern about ‘under-reporting’ of available research funding and of foreign sources of research support (i.e., foreign components, defined below). It is critically important that complete and accurate information about research support is included in all grant and contract proposals whenever required. This requirement will vary from sponsor to sponsor, so be sure to include other support information in conformance with each Agency’s instructions.

Common Forms

On November 1, 2023, the U.S. Government released Common Disclosure Forms for the Biographical Sketch and Current and Pending (Other) Support Information. The Common Forms are part of the Government’s effort to harmonize disclosure requirements across Federal agencies.

- Effective for proposals submitted or due on or after May 20, 2024, NSF will require senior and key personnel to use the Common Forms.
- NIH will use a phased in approach for the use of the Common Forms to align with the Forms I release which is planned for January 25, 2025.
- Other Federal Agencies will also begin to require use of the Common Forms.

The National Science Foundation (NSF) has agreed to serve as steward of the Common Forms. The Common Forms and related information are available on the NSF website [here](#).

NIH Other Support – Information on other active and pending support may be requested by NIH to ensure there is no scientific budgetary or commitment overlap. This applies to proposals, Just-in-Time and RPPR progress reports. Specifically, NIH requires that Other Support include: “...all resources made available to researcher or senior key personnel in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are based at the institution the researcher identifies for the current grant. Other support does not include training awards, prizes, start-up support from the US based institution, or gifts.”

Full details and resources are found [here](#).

NSF Common Form for Current and Pending (Other) Support Information – must include all resources made available to a researcher in support of and/or related to all of their professional R&D efforts, including resources provided directly to the individual rather than through the research organization, and regardless of whether or not they have monetary value (e.g., even if the support received is only in-kind, such as office/laboratory space, equipment, supplies, or employees). This includes resource and/or financial support from all foreign and domestic entities, including but not limited to, financial support for laboratory personnel, and participation of student and visiting researchers supported by other sources of funding.

The Common Forms and related information are available on the NSF website at:
https://www.nsf.gov/bfa/dias/policy/nstc_disclosure.jsp.

Department of Defense (DOD) –

Proposers must submit the below information **for all key personnel, whether or not the individuals' efforts under the project are to be funded by the DOD:**

- A list of all previous (award period of performance ending within the past 5 years), current projects the individual is working on, in addition to any future support the individual has applied to receive, regardless of the source.
- Title, brief description of the project's goals and list of the specific aims.
- Period of performance
- The number of person-months (or partial person-months) per year to be devoted to the project
- The total award amount for the entire award period covered (including facilities and administrative costs)
- Name and address of the agencies and/or other parties supporting the other research projects.

In addition:

List all positions and scientific appointments, both domestic and foreign, held by senior/key personnel that are relevant to an application, including affiliations with foreign entities or governments. This includes titled academic, professional, or institutional appointments whether or not remuneration is received and whether full-time, part-time, or voluntary (including adjunct, visiting or honorary).

Report all current projects and activities that involve senior/key personnel even if the support received is only in-kind (e.g., office/laboratory space, equipment, supplies, employees). All research resources including, but not limited to, foreign financial support, research or laboratory personnel, lab space, scientific materials, selection to a foreign "talents" or similar-type program or other foreign or domestic support must be reported.

DOD/CDMRP requires that a cover letter certifying to the accuracy and completeness of the Other Support and signed by the organization's Business Official (ORPA) be submitted along with the Other Support documents as part of DOD's Administrative Review (i.e., Just-in-Time).

Please see [here](#) for ORPA instructions to obtain this letter.

Department of Energy (DOE)

The following information is required for solicitations through the DOE Office of Science and most other DOE components.

Review the solicitation carefully for variations and program-specific requirements.

Current and Pending support is intended to allow the identification of potential duplication, over-commitment, potential conflicts of interest or commitment, and all other sources of support.

The PI and each senior/key person at the prime applicant and any proposed subaward must provide a list of all sponsored activities, awards, and appointments, whether paid or unpaid;

- provided as a gift with terms or conditions or provided as a gift without terms or conditions;
- full-time, part-time, or voluntary positions;
- faculty, visiting, adjunct, or honorary;
- cash or in-kind;
- foreign or domestic;
- governmental or private-sector;

directly supporting the individual's research or indirectly supporting the individual by supporting students, research staff, space, equipment, or other research expenses.

All foreign government-sponsored talent recruitment programs must be identified in current and pending support.

NASA PIs and Co-PIs must provide full disclosure of all ongoing and pending projects and proposals, both domestic and foreign, regardless of whether salary support is received and in which they are performing or will perform any part of the work. Co-Is proposing to spend 10% or more of their time on the proposed effort must disclose ongoing and pending projects and proposals that require greater than 10% of their time.

Please refer to the [NASA Guidebook for Proposers Responding to a NASA Funding Announcement \(April 2021\)](#) for further details regarding current and pending support.

Disclosure of Foreign Components to Federal Agencies

There is heightened concern from federal agencies about the lack of disclosure of collaborations with, and/or funding by, foreign entities. This includes both foreign governments and foreign institutions of higher education. Here again, each agency provides its own definition of what constitutes a “foreign” or “international” component.

NIH’s comprehensive definition of a foreign component can be found [here](#). It includes:

- collaborations with investigators at a foreign site anticipated to result in co-authorship
- use of facilities or instrumentation at a foreign site;
- receipt of financial support or resources from a foreign entity. Foreign

travel for consultation is **not** considered a foreign component.

Disclosure of a Foreign component to the NIH:

There are multiple ways in which foreign components can be appropriately disclosed to NIH. For example:

- Identifying a “foreign component” in an NIH grant application;
- Listing a “non-U.S. performance site”;
- Identifying foreign relationships and activities in a Biosketch;
- Checking “yes” to the question on the Cover Page Supplement Form asking, “Does this project involve activities outside of the United States or partnerships with international collaborators?”

NIH employs the Foreign Award and Component Tracking System (FACTS) system to record all activities involving foreign countries.

NSF asks for information on International Activities on the Cover sheet with the following instruction:

“For each proposal that describes an international activity, proposers should list the primary countries involved. An international activity is defined as research, training, and/or education carried out in cooperation with international counterparts either overseas or in the U.S. using

virtual technologies. Proposers also should enter the country/countries with which project participants will engage and/or travel to attend international conferences.”

A fuller definition of International Activities is found [here](#).

Other Agency Positions: DOE & NASA

In other agency actions, the **Department of Energy (DOE)** issued a notice in February 2019 announcing its intention to require “federal and contractor personnel fully disclose and, as necessary, terminate affiliations with foreign government-supported talent recruitment programs.” It is anticipated that DOE may similarly restrict grantees from participating in foreign talent recruitment programs of countries deemed “sensitive” by DOE. It is therefore prudent for UR investigators to carefully evaluate any existing or planned participation in foreign government- supported talent recruitment programs.

NASA has had a longstanding prohibition in its agency appropriation language with respect to the People’s Republic of China (PRC) and Chinese-owned companies. Since 2011, NASA is restricted from using funds to enter into or fund any grant, cooperative agreement or contract to participate, collaborate, or coordinate bilaterally in any way with PRC or any Chinese-owned company. Should you identify an omission or error in a previously submitted proposal, you must contact your ORPA RA. They will work with you to determine how best to update this information with the relevant sponsor. Your ORPA RA is also available to answer any questions you may have about these requirements.