Guidance on Support Disclosures when Preparing Proposals for External Funding

Disclosing other sources of support is often a required element of grant proposals. Recently, sponsors have been particularly concerned about lack of disclosures related to foreign governments and foreign collaborators, and some sponsors have issued new guidance that applies to all sources of support, not just foreign.

Researchers should be aware of the necessity to disclose monetary and non-monetary support that is related to their research OR that requires a commitment of their time. *Researchers should make sure they review disclosure requirements prior to the submission of each grant proposal and progress report because requirements and forms are subject to change.*

For Current and Pending support or similar sections, all senior/key personnel should report:

- Funding or other resources related to their research provided by another sponsor or organization.
- Materials, items, or services provided to the researcher that come with the expectation of an associated time commitment, whether or not these things are related to their research and whether or not there is an associated monetary value.
- Some sponsors consider internal funding reportable support.

For Facilities and Equipment or similar sections, report:

• Internal and external resources intended for use on the project, such as use of institutional laboratory facilities or equipment, or materials provided by another organization.

For Biographical Sketch or similar sections, report:

• Visiting, adjunct, honorary, or other appointments outside of the home institution whether or not these appointments are related to their research, and whether or not the appointment is compensated. Include full-time and part-time appointments, as well as summer appointments. This includes participation in foreign "talent"-type programs.

Expectation of transparency: If a researcher is unsure whether or not to report something, it is better to err on the side of disclosure. Note that sponsors generally require updates after the award is made, usually in the progress report.

Agency-specific information: Appropriate disclosures should be made in all proposals. Several agencies have issued guidance and details; be sure to check for updates as this is rapidly evolving.

National Institutes of Health (NIH)

- Other Support information: <u>https://grants.nih.gov/grants/forms/othersupport.htm</u>
- See also related FAQs (updated periodically): <u>https://grants.nih.gov/grants/faq-other-support-foreign-components.htm</u>

National Science Foundation (NSF)

- Dear Colleague Letter: <u>https://www.nsf.gov/pubs/2019/nsf19200/research_protection.jsp</u>
- PAPPG: (see especially the Current and Pending Support requirements): www.nsf.gov/pubs/policydocs/pappg22 1/nsf22 1.pdf
- Current and Pending Support FAQs: www.nsf.gov/bfa/dias/policy/cps_faqs/currentandpendingfaqs_june2021.pdf