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# **Guidance on the Disclosure of Current & Pending Support / Other Support, including Biosketch Requirements**

September 14, 2021

Sponsored Projects Services

UNIVERSITY OF  
OREGON

# Discussion Topics

- Internal UO processes around FCOI and COI-COC
- Changes to NIH forms
- Changes to regulations
  - Foreign collaborations/engagements
- Agency-specific guidance
  - NIH Other Support and NSF Current & Pending
  - NIH/NSF Biosketches
  - Other agencies
- References and resources



# UO's FCOI Process

- The federal Financial Conflict of Interest in Research (FCOI) regulations and [UO's FCOI policy](#) have not changed
  - FCOI Investigators – anyone responsible for the design, conducting or reporting of research – must still report all Significant Financial Interests (SFIs) in the SFI disclosure they submit through EPCS
  - Disclosing foreign support for grant proposal purposes does not satisfy FCOI disclosure requirements, and vice versa



# UO's COI-COC/Outside Activities Process

- UO's [Conflict of Interest, Conflict of Commitment, and Outside Activities Policy](#) requires disclosure of certain outside activities and interests to the UO
  - Interests and activities that must be disclosed in accordance with the UO's COI-COC policy must be disclosed directly to Research Compliance Services
  - Disclosing foreign support for grant proposal purposes does not satisfy COI-COC policy disclosure requirements, and vice versa
- This means a researcher may need to disclose the foreign support in multiple places



# Changes to NIH Forms

NIH Other Support	NIH Biographical Sketch
<p>Has been re-organized to separate funded projects from in-kind contributions.</p>	<p>Section B 'Positions and Honors' has been renamed 'Positions, Scientific Appointments, and Honors'.</p>
<p>Signature block added, for Program Director/Principal Investigator or Other Senior/Key Personnel to certify the accuracy of the information submitted. Each PD/PI or senior/key personnel must electronically sign* their respective Other Support form as a PDF prior to submission.</p> <p><small>*UO allows e-signatures through Acrobat, Adobe Sign, DocuSign, etc. <a href="https://pcs.uoregon.edu/sites/pcs1.uoregon.edu/files/esignatureprocedures_final_topost.pdf">https://pcs.uoregon.edu/sites/pcs1.uoregon.edu/files/esignatureprocedures_final_topost.pdf</a></small></p>	<p>For the non-Fellowship Biosketch, Section D. has been removed.</p> <p>For the Fellowship Biosketch, Section D has been updated to remove 'Research Support.'</p> <p>As applicable, all applicants may include details on ongoing and completed research projects from the past three years that they want to draw attention to within the personal statement, Section A.</p>



# Changes to NSF Forms

## NSF Current & Pending Support

New format required October 4, 2021:  
[https://www.nsf.gov/bfa/dias/policy/nsfapprovedformats/cps\\_oct42021.pdf](https://www.nsf.gov/bfa/dias/policy/nsfapprovedformats/cps_oct42021.pdf)

- Can create through SciENcv
- NSF will be providing a fillable PDF
- Trimming service will cut empty sections
- New sections Objectives and Overlap with other projects

## NSF Biographical Sketch

New format required October 4, 2021:  
[https://www.nsf.gov/bfa/dias/policy/nsfapprovedformats/biosketch\\_oct42021.pdf](https://www.nsf.gov/bfa/dias/policy/nsfapprovedformats/biosketch_oct42021.pdf)

- Page limits changed from two to three pages



# Changes to Regulations

*Driven by federal climate surrounding foreign collaborations/engagements/donations:*

- Yale, Harvard, and other universities in aggregate [failed to report at least \\$6.5B](#)
- Harvard professor arrested for lying about foreign sources of support received from China, plus tax offenses, [trial pending](#)

*Federal government implemented new requirements to disclose sources and amounts of foreign support*



# Agency-Specific Guidance – NIH & NSF

	NIH Other Support/Biosketch	NSF Current & Pending
<b>When required to disclose support/contributions</b>	<ol style="list-style-type: none"> <li>1. At the proposal application stage, in the Other Support and Biographical Sketch</li> <li>2. At the Just-in-Time stage, before an award is made</li> <li>3. In the annual or final RPPR</li> <li>4. <u>Immediately</u> after the identification of previously undisclosed support or contribution, in a revised Other Support form and submitted by SPS to the GMS listed in the NOA</li> </ol>	<ol style="list-style-type: none"> <li>1. At the proposal application stage, in the Current &amp; Pending section</li> <li>2. <a href="#">In the annual or final RPPR</a></li> <li>3. <a href="#">Within 30 calendar days</a> of the identification of previously undisclosed support or contribution, submitted by UO AOR to NSF</li> </ol>

**When it goes into effect**

Already in effect

Already in effect



# Agency-Specific Guidance – NIH & NSF

	NIH Other Support	NSF Current & Pending
<b>Required disclosures <u>not</u> tied to a monetary value</b>	"... <u>includes</u> all resources made available to a researcher in support of and/or related to their research endeavors, regardless of whether or not they have monetary value..."	"...includes all resources made available to an individual in support of and/or related to all of his/her research efforts, regardless of whether or not they have monetary value..."
<b>Required disclosures <u>not</u> limited to institutional appointment</b>	"...regardless of whether they are based at the institution the researcher identifies for the current grant."	"...must be provided for this project, for ongoing projects, and for any proposals currently under consideration from whatever source irrespective of whether such support is provided through the proposing organization or is provided directly to the individual. "



# Agency-Specific Guidance – NIH & NSF

	NIH Other Support	NSF Current & Pending
<b>Personnel types required to disclose</b>	"...required for all individuals designated in an application as senior/key personnel—those devoting measurable effort to a project."	"...each individual designated as senior personnel on the proposal."
<b>Personnel types <u>not</u> required to disclose</b>	<p>"PDs, training faculty, and other individuals" on "training grants"</p> <ul style="list-style-type: none"> <li>Collected in other sections of training grant applications.</li> </ul> <p>"...not required for individuals categorized as Other Significant Contributors."</p>	Not specifically mentioned in PAPPG. Other than senior personnel excluded per above.

# Agency-Specific Guidance – NIH & NSF

	NIH Other Support	NSF Current & Pending
<p><b>Required disclosures include <u>all</u> foreign and domestic sources</b></p>	<p>“...resources and/or financial support from all foreign and domestic entities, that are available to the researcher.”</p>	<p>“...includes, for example, Federal, State, local, foreign, public, or private foundations, non-profit organizations, industrial or other commercial organizations, or internal funds allocated toward specific projects.”</p>
<p><b>Required disclosures do <u>not</u> include NIH training awards or items with no commitment</b></p>	<p>“...training awards, prizes, or gifts...where there is no expectation of anything in return.”</p>	<p>“If the individual is not requesting salary, and will not be expending any effort, then the project should not be reported in current and pending support.”</p>



# Agency-Specific Guidance – NIH & NSF

	NIH Other Support	NSF Current & Pending
<b>Required disclosures include in-kind contributions</b>	<p>"...e.g. office/laboratory space, equipment, supplies, or employees or students supported by an outside source. If the time commitment or dollar value of the in-kind contribution is not readily ascertainable, the recipient must provide reasonable estimates."</p> <p>"An item or service given with the expectation of an associated time commitment is not a gift and is instead an in-kind contribution and must be reported as Other Support."</p>	<p>"...also includes in-kind contributions (such as office/laboratory space, equipment, supplies, employees, students. In-kind contributions not intended for use on the project/proposal being proposed that have associated time commitments also must be reported."</p>



# Agency-Specific Guidance – NIH & NSF

	NIH Other Support	NSF Current & Pending
<b>Required disclosures do <u>not</u> include institutional resources</b>	“Institutional resources, such as core facilities or shared equipment that are made broadly available, should not be included in Other Support, but rather listed under Facilities and Other Resources.”	Included in “Facilities, Equipment and Other Resources” section.
<b>Required disclosures do <u>not</u> include consulting agreements</b>	“Consulting agreements, when the PD/PI or other senior/key personnel will be conducting research as part of the consulting activities. Non-research consulting activities are not Other Support.”	Not specifically mentioned by NSF.



# Agency-Specific Guidance – NIH & NSF

	NIH Other Support	NSF Current & Pending
<b>Institutional resources <u>not</u> included in disclosures</b>	“Institutional resources, such as core facilities or shared equipment that are made broadly available, should not be included in Other Support, but rather listed under Facilities and Other Resources.”	Included in “Facilities, Equipment and Other Resources” section.
<b>Types of support (examples)</b>	“...financial support for laboratory personnel, and provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.).”	Not specifically mentioned by NSF.

# Agency-Specific Guidance

	NIH Other Support	NSF Current & Pending
<b>Award amount required to disclose</b>	“Total Award Amount (including Indirect Costs)” – per the Other Support Word document	“The total award amount for the entire award period covered (including indirect costs) must be provided...”
<b>Level of commitment required to disclose</b>	“Person Months (Calendar/Academic/Summer) per budget period” – per the Other Support Word document	“...the number of person-months (or partial person-months) per year to be devoted to the project by the individual. Person-month information included in current and pending support may differ from the person-months requested on the budget for a given project.”



# Agency-Specific Guidance

	NIH Other Support	NSF Current & Pending
<b>Required documentation to include with foreign support disclosures</b>	"...recipients are required to submit copies of contracts, grants or any other agreement specific to senior/key personnel foreign appointments and/or employment with a foreign institution as supporting documentation. If they are not in English, recipients must provide translated copies. This supporting documentation must be provided as part of the Other Support PDF following the Other Support Format page."	Not mentioned.



# Agency-Specific Guidance – NASA

- PIs and Co-PIs: Are required to “provide all ongoing and pending projects and proposals (regardless of salary support) in which they are performing or will perform any part of the work.”
- PIs and Co-PIs: are also required to “list their current and pending support with Chinese universities and other similar institutions or a Chinese-owned company at the prime recipient level and at all subrecipient levels, whether the bilateral involvement is funded or performed under a no- exchange of funds arrangement.” As required above, they must include the following information with each current and pending project:
  - Title of funded project or proposal title;
  - Name of PI on award or proposal;
  - Program name (if appropriate) and sponsoring agency or organization, including a point of contact with their telephone number and email address;
  - Performance period;
  - Total amount proposed (if pending) or received by that PI (including indirect costs) for that award or the amount per year if uniform (e.g., \$50k/year); and
  - Time commitment by the PI for each year of the period of performance.



# Agency-Specific Guidance – NASA

- Co-Is: If proposing to spend  $\geq 10\%$  “of their time in any given year to the proposed effort shall provide a list of ongoing and pending projects and proposals (regardless of salary support) that require more than 10% of their time in any given year.”
- Proposals do not need to include the current proposal on the list, unless it has been submitted to another funding opportunity with NASA or another sponsor.
- Proposing PI: Must “notify the NASA Program Officer identified in the NOFO immediately of any successful proposals that are awarded for substantially overlapping work as proposed to NASA, any time after the proposal due date and until the announcement of NASA’s selections.”
- “Current and pending support is not required for Co-Is at non-U.S. institutions. Current and pending support is usually not required for students, but it may be requested, depending on the requirements of the NOFO.”



# Agency-Specific Guidance – DoD

- Related to research and research-related educational activities supported by DoD grants, cooperative agreements, Technology Investment Agreements, and other non-procurement transactions\*.

\*For all other types of grants, the capture of the above information is optional.

- Proposers shall 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 current projects the individual is working on, in addition to any future support the individual has applied to receive, regardless of the source.
  - Title and objectives of the other research projects.
  - The percentage per year to be devoted to the other projects.
  - The total amount of support the individual is receiving in connection to each of the other research projects or will receive if other proposals are awarded.
  - Name and address of the agencies and/or other parties supporting the other research projects.
  - Period of performance for the other research projects.



# Agency-Specific Guidance – DoD

- This information shall be included in the Senior Key Person Profile form included in the NFO.
- This collection only applies to persons identified as key personnel.
- This information shall not be included in the overall proposal page limits.
- The NFO shall notify proposers that failure to submit this information may cause the proposal to be returned without further review, and that the DoD reserves the right to request further details from a proposer before making a final determination on funding the effort.



# Agency-Specific Guidance – DOE

- The DOE Office of Science (SC) requires use of NSF's Current & Pending format (or generated through SciENcv)
- 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;
    - 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.



# Agency-Specific Guidance – DOE

- For every activity, list the following items:
  - The sponsor of the activity or the source of funding
  - The award or other identifying number
  - The title of the award or activity. If the title of the award or activity is not descriptive, add a brief description of the research being performed that would identify any overlaps or synergies with the proposed research.
  - The total cost or value of the award or activity, including direct and indirect costs. For pending proposals, provide the total amount of requested funding.
  - The award period (start date – end date).
  - The person-months of effort per year being dedicated to the award or activity



# References and Resources

- **National Institutes of Health:**

- [NIH Notice NOT-OD-19-114](#): Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components
- [NIH Notice NOT-OD-21-073](#): Upcoming Changes to the Biographical Sketch and Other Support Format Page for Due Dates on or after May 25, 2021
- [NIH Notice NOT-OD-21-110](#): Implementation of Changes to the Biographical Sketch and Other Support Format Page
- [NIH Notice NOT-OD-21-122](#): Announcing New Inbox for Inquiries Related to Changes to Biographical Sketch and Other Support Format Page

- **National Science Foundation (NSF):**

- NSF Proposal and Award Policies and Procedures Guide ([PAPPG NSF 22-1](#))
- Helpful Table: [NSF Pre-award and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending Support](#)



# References and Resources

- **NASA:** [Guidebook for Proposers, May 2021 Version](#)
- **DoD:** [OUSD Research Protection Memo](#)
- **DOE:** [Funding Opportunity Announcement DE-FOA-0002414](#)
  
- **Federal FCOI Regs. 42 CFR 50, Subpart F:** [Promoting Objectivity in Research](#)
  
- **University of Oregon:**
  - [Policy: Financial Conflicts of Interest \(FCOI\) in Research](#)
  - [Policy: Conflicts of Interest \(COI\), Conflicts of Commitment \(COC\), and Outside Activities](#)
  - [OVPRI Foreign Engagement webpage](#)
  - SPS Guidance on OVPRI website: coming soon!

