

Princeton > Coffee with ORPA  
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Research  
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January 24, 2024



Proposal Compliance Essentials  
Part 2: Disclosure Document Resources

Presented by:  
Office of Research & Project Administration

# Office of Research & Project Administration

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# Proposal Compliance Essentials

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First of a three-part series:

- Part 1: What You need to Know About the Princeton ERA Compliance Questions
  - December 12, 2023 | 9 a.m. – 10 a.m.
  
- Part 2: Disclosure Document Resources
  - January 24, 2024 | 9 a.m. – 10 a.m.
  
- Part 3: Budgeting Best Practices
  - February 26, 2024 | 9 a.m. – 10 a.m.

# Agenda for CWO 1/24/24

- Compliance: Why is it important?
- Sponsor Requirements
  - NIH
  - NSF
  - DOE
  - NASA
  - DOD
- Resources for reviewing Biosketch and Current & Pending
- Common Questions & Common Form
- Case Scenarios
- Communication

# Why do we care about compliance?

- Regulatory/Compliance with the law
- In many cases, awards are from taxpayer money
- Sponsored funding comes with strings attached
  - The purpose of which are to help the researchers and the University **be accountable** (to the sponsor, to regulation, etc.)
- Compliance processes may seem burdensome, but they serve an important purpose:
  - Helping Princeton researchers and administrators steward funds in a **legal, ethical way** that the University can stand behind
- While disclosure compliance and review can take time, ORPA is committed to streamlining these processes as much as possible

# Ensuring Compliance to Sponsors

- Sponsors continue to request compliance information **to ensure transparency** of their full funding portfolio with domestic or foreign collaborators
- Principal Investigators certify to the **accuracy and completeness** of this information at proposal submission
- How do we as research administrators **collect and verify** this information?



# Purpose of Biosketch & Current and Pending

## > Biosketch

- > Purpose is to assess how **well qualified** the individual is to conduct the proposed activities.
- > To accomplish this purpose, individuals **must disclose** their education, training, appointments, and positions.

## > Current & Pending (Other) Support

- > Purpose is to **assess capacity** of the individual to carry out the research as proposed and to help identify any potential scientific and budgetary **overlap/duplication**, as well as **overcommitment** with the project being proposed.
- > To accomplish this, individuals **must disclose** on C&P **all resources**, domestic or foreign, that directly supports the individual's research endeavors.

# NSPM-33 (National Security Presidential Memorandum)

- The U. S. government issued [NSPM-33](#) in January of 2021 to promote research security and integrity in U.S.-funded scientific research.
- The main aims of the NSPM-33 are:
  - To **strengthen** protections of U.S. funded R&D against foreign government interference and misappropriation
  - To **standardize** disclosure requirements across research agencies to the greatest extent possible
  - To **maintain** an open environment to foster research discoveries and innovation that benefit the U.S. and the world
- NSPM-33 implementation guidance addresses 5 major areas:
  - **Disclosure Requirements and Standardization**
  - Digital Persistent Identifiers
  - Consequences for Violation of Disclosure Requirements
  - Information Sharing
  - Research Security Programs

<https://www.whitehouse.gov/wp-content/uploads/2022/01/010422-NSPM-33-Implementation-Guidance.pdf>





# NIH – Disclosure Requirements & Expectations

## Recipient Organization Responsibilities:

- Ensure that all senior/key personnel disclose **all sources** of research support, foreign components, Significant Financial Interests (SFIs) and Financial Conflicts of Interest (FCOI)
- **Immediately notify** the NIH of developments that have a significant impact on NIH-supported activities.
  - Aim to submit a revised biosketch to the NIH within **30 days** of discovering a new disclosure.
- Obtain NIH **prior approval** for inclusion of any **foreign components** to an NIH award.
  - Foreign components defined as “the existence of any significant scientific element or segment of a project outside of the U.S.,” **whether or not** NIH grant funds are expended.

<https://grants.nih.gov/policy/foreign-interference/requirements-for-disclosure>



## ➤ NIH Biosketch must include:

- All professional preparation (e.g. educational degrees & training) and organizational affiliations and appointments
- All current positions and scientific appointments listed in reverse chronological order (most recent appointment first)
  - Include **full & part-time** titled academic, professional, or institutional appointments **whether or not** remuneration is received
- **Five** contributions to science with no more than **four** citations per contribution
- If including an optional link to published work, **URL must be .gov** (i.e. My Bibliography)
  - No other hyperlinks are allowed in the biosketch
- Participation in programs sponsored by foreign entities
  - Appropriate placement in either biosketch or O.S. will be contract-dependent
- Biosketch must fit within the **5-page** limit

<https://grants.nih.gov/grants/forms/biosketch.htm>



# NIH: Other Support (OS)

## > NIH Other Support must include:

- > Current or pending participation in programs sponsored by all **domestic and foreign** governments/entities
  - > Even when support is provided through an intermediary.
- > Consulting activities that involve research
- > Contracts/agreements specific to foreign appointments
- > Travel supported/paid by an external entity to perform research activities with an associated time commitment.
- > In-kind contributions, e.g. office/lab space, equipment, supplies, etc.
- > Other support document must be **certified by PI using DocuSign**
  - > PIs must certify that information disclosed is **accurate, current, and complete**

## > NIH Other Support does not include:

- > Other support does not include training awards, prizes, true gifts, internal start-up packages, teaching commitments

<https://grants.nih.gov/grants/forms/othersupport.htm>



# NIH: DocuSign for OS Documents

- Researchers must **electronically sign** their OS document via **DocuSign**, Princeton University's only licensed and approved platform for electronic signature.
- All researchers and research administrators should **request** and activate a Princeton DocuSign account to electronically sign the OS.
  - Note, Administrators can **route** the NIH OS document to researchers for electronic signature via DocuSign
- OS documents should be **flattened** before upload to grant proposals, JITs and RPPRs.

<https://orpa.princeton.edu/resources/inappropriate-foreign-influence-and-disclosure-integrity/nih-guidance/docusign-and-other>



# NSF: Disclosure Requirements & Expectations

- NSF requires current, up-to-date personnel documents for each individual **identified as senior personnel** on a submitted proposal:
  - Biographical Sketch (Biosketch)
  - Current and Pending (Other) Support
  - Collaborators and Other Affiliations (COA)
- As of October 23<sup>rd</sup> 2023, all senior personnel must use SciENCv to **certify** that the information on their personnel documents is accurate, current and complete.
- Senior personnel must use the revised templates available on the [NSF Policy Office website](#).
- Individuals are required to disclose contracts associated with participation in programs sponsored by foreign governments/entities including [foreign talent recruitment programs](#).
- If discovered after award that a disclosure should have been submitted at the time of proposal submission, the AOR has **30 days** to submit a post-award disclosure to NSF.



# NSF: Biographical Sketch (Biosketch)

- > **NSF Biosketch must include:**
  - > All professional preparation (e.g. educational degrees & training)
  - > All **domestic and foreign** titled academic, professional, or institutional positions **whether or not** remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary).
    - > List positions in reverse chronological order (most recent appointment first)
  - > A list of up to **10 Products** that demonstrate the individual's qualifications to carry out the project as proposed.
  - > A list of up to **5 Synergistic Activities** that showcase distinct examples of the broader impact of the individual's professional and scholarly activities.
  - > Biosketch must fit within the **3-page** limit.
  - > PI **must certify** that the information provided is current, accurate, and complete using SciENcv.

[https://www.nsf.gov/bfa/dias/policy/researchprotection/commonform\\_biographicalsketch.pdf](https://www.nsf.gov/bfa/dias/policy/researchprotection/commonform_biographicalsketch.pdf)



# NSF: Current & Pending (Other) Support

- **Current & Pending must include:**
  - All **domestic and foreign** titled academic, professional, or institutional positions whether or not remuneration is received, and whether full-time, part-time.
  - Contracts associated with participation in programs sponsored by foreign governments, instrumentalities, or entities, including foreign government-sponsored talent recruitment programs.
  - In-kind contributions, e.g. office/lab space, equipment, supplies, etc.
    - Provide a brief statement (1,500 characters) of the overall objectives of the in-kind contribution
    - Provide a Statement of Potential Overlap with any current or pending support. If no overlap, enter N/A in this field.
  - There is **no page limit** for the NSF Current & Pending document.

[https://www.nsf.gov/bfa/dias/policy/cps\\_faqs/currentandpendingfaqs\\_feb2023.pdf](https://www.nsf.gov/bfa/dias/policy/cps_faqs/currentandpendingfaqs_feb2023.pdf)



# DOE: Biosketch

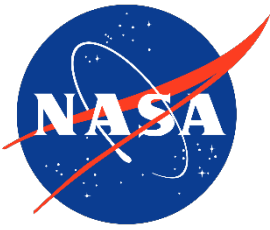
- Use NSF's **Science Experts Network Curriculum Vitae (SciENCv)** format.
- 5-page limit.
- **Education and Training:** Undergraduate, graduate and postdoctoral training, provide institution, major/area, degree and year.
- **Research and Professional Experience:** Beginning with the current position, list professional/academic positions in chronological order with a brief description. List all **current** academic, professional or institutional appointments, foreign or domestic, at the applicant institution or elsewhere, whether remuneration is received, and, whether full-time, part-time, or voluntary.
- **Publications:** Provide a list of up to 10 publications most closely related to the proposed project.
- **Synergistic Activities:** List no more than 5 professional and scholarly activities related to the effort proposed.





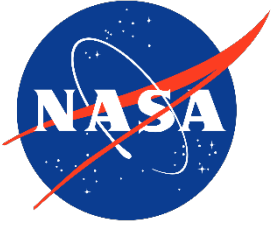
# DOE: Current and Pending Support

- Purpose is identification of potential duplication, overcommitment, potential conflicts of interest or commitment, and all other sources of support.
- List 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.
- Include the current application.
- All foreign government-sponsored talent recruitment programs must be identified in current and pending support.



# NASA: Biosketches

- Purpose is to determine whether project participants have appropriate qualifications, capabilities, and expertise to provide confidence that the proposed objectives will be achieved.
- PIs, Co-Principal Investigators (CoPIs), and any Co-Is shall include a biographical sketch that includes their professional experiences, positions, and a bibliography of publications, especially those relevant to the proposed effort, as well as a description of scientific, technical, and management experience on relevant prior efforts.
- Co-Is proposing to spend 10 percent or more of their time (in any given year) to the proposed effort are limited to a 1-page sketch.
- PIs, CoPIs, and any Co-Is serving in one of the three special Co-I categories are permitted 2 pages each for their CVs.
- Biographical sketches are not required for Co-Is or other team members spending less than 10 percent of their time in any given year on the proposed work unless specified in the NOFO.



# NASA: Current & Pending Support

- All ongoing and pending projects and proposals (regardless of salary support) in which they are performing or will perform any part of the work.
- Any current and pending support with China, including Chinese universities and other similar institutions or a Chinese-owned company at the prime recipient level and at all subrecipient levels.
- Co-Is spending 10% or more of effort must provide C&P.
- Do not have to list current proposal on list of pending proposals unless it has been submitted in response to another federal funding opportunity.



# DOD: Biosketch

- Required for PI and all Senior/Key Personnel.
- 5-page limit.
- Biosketch requirements can vary depending on the DOD agency and funding opportunity.
- Review your individual announcement for specific proposal requirements.
- At a minimum, disclose all paid or unpaid positions with non-profit or commercial entities or academic or research institutions, including honorary positions, affiliated positions, joint positions, participation in Talents Programs, and relevant honors. (Some announcements allow use of NIH biosketch.)



# DOD: Current & Pending Support

- C&P requirements will vary depending on the DOD agency and funding opportunity.
- Review your individual announcement for specific proposal requirements.
- In addition to current and pending projects, DOD may require disclosure of all previous awards ending within last 5 years.
- For each entry, the following information is required: title, time commitments, supporting agency, name and address of the contracting/grants officer, performance period, award amount, description of goals and aims, and identification of overlap.
- Report all research resources provided through the applicant organization, or through another domestic or foreign organization.
- Report all in-kind resources regardless of monetary value and/or where they are based such as financial support for laboratory personnel, lab space, scientific materials, or provision of high value materials that are not freely available (biologics, chemical, model systems, technology, etc.)
- Report selection to a foreign “talents” or similar-type program.
- PI and all senior/key may be required to certify C&P.
- An updated C&P may be required if an award is recommended for funding.

# Similarities/Differences in Biosketch Guidelines

	Signature Required	Page Limit	Format	List all or current
NSF	Yes	3	SciENCv	All current positions/appointments
NIH	No	5	NIH format or SciENCv	All current positions/appointments
DOE Office of Science	Yes – since it follows NSF	3	Reverts to NSF format (i.e. SciENCv)	All current positions/appointments
NASA	No	2 pages for PI; 1 page for everyone else	None specified	List all positions/appointments relevant to the proposed project
DOD	Appears to not be required	5	Varies	Varies

# Similarities/Differences in C&P Guidelines

	Signature Required	Format	Timing	Updates	List this proposal or not
NSF	Yes through SciENCv	SciENCv	Submit with proposal	Annual progress reports & omissions must be reported w/i 30 days.	List THIS proposal as pending.
NIH	Yes – DocuSign & flattened	NIH or SciENCv (SciENCv not required at this time, but is expected.)	Submit only at JIT	Annual progress reports & omissions must be reported w/i 30 days.	Don't list THIS proposal as pending.
DOE Office of Science	Yes – since it follows NSF	Reverts to NSF format (i.e. SciENCv)	Submit with proposal	Within 30 days of any change.	List THIS proposal as pending.
NASA	No	NASA standard template	Submit with proposal	None	Don't list THIS proposal as pending unless submitted to another announcement.
DOD	Appears to be required	Varies, some follow NIH	Submit with proposal	DOD may ask for update before award is made	Varies

# Roles, Responsibilities & Process

## Department Role

- Work with Faculty and Faculty Assistants to prepare forms.
- Familiarity with sponsor disclosure requirements
- Review Individual Portfolio Report, Current & Pending Report, SciENCv

## ORPA Role

- Review documents and verify their accuracy
- Ensure documents adhere to sponsor requirements
- Contact sponsor for clarifications if necessary



# Communication is an important tool!

## Communication includes:

- Discussions with faculty
- Discussions with colleagues in your department (e.g. other grant managers, faculty assistants, etc.)
- Discussions with grant managers outside your department.
- Discussions with your GCA



## Practical tips for discussions with faculty:

- Importance of accurate, complete & current information
- Importance of biosketch & CP forms to sponsors
- We support their research and want them to be successful
- We understand burden, but need their help
- Burden is shared between faculty, department grant staff, and ORPA
- [Disclosures Yes/No Pre-Checklist](#) – Helpful tool to start conversation. Will be updated soon.



# Resources: Current & Pending Report

## Department Responsibilities:

- Cross reference the C&P document provided by the PI with the C&P report on PeopleSoft
- A helpful tip is to export the C&P report as an **Excel document** which will allow you to search for awards using the award #

1.

2.

Support Status	Current
Title	Title: CWO Disclosure Integrity Workshop
Principal Investigator	Doe, Jane
Co-Principal Investigator	
Sponsor	NSF - National Science Foundation
Prime Sponsor	
Sponsor Award Number	BCS-1844559
Period	05/01/2019 - 04/30/2023
Anticipated Amount	
Location	Princeton University

Support Status	Current
Title	Title: CWO Disclosure Integrity Workshop
Principal Investigator	Doe, Jane
Co-Principal Investigator	
Sponsor	NIH NIMH
Prime Sponsor	
Sponsor Award Number	5R01MH114904-05
Period	09/18/2017 - 05/31/2023
Anticipated Amount	
Location	Princeton University

Support Status	Current
Title	Title: CWO Disclosure Integrity Workshop
Principal Investigator	Doe, Jane
Co-Principal Investigator	
Sponsor	NIH NIMH
Prime Sponsor	
Sponsor Award Number	5R21MH127284-02
Period	05/09/2022 - 04/30/2024
Anticipated Amount	
Location	Princeton University

Effective 01/30/2023      NSF C&P(O/S)      OMB-3145-0058

**CURRENT AND PENDING (OTHER) SUPPORT INFORMATION**  
Provide the following information for the Senior/key personnel and other significant contributors. Follow this format for each person.

---

\*NAME: [REDACTED]

\*POSITION TITLE: Associate Professor

\*ORGANIZATION AND LOCATION: Princeton University, Princeton, New Jersey, United States

**Projects/Proposals**

\*Project/Proposal Title: [REDACTED]

\*Status of Support: current

Proposal/Award Number: R21MH127284-01A1

\*Source of Support: NIH

\*Primary Place of Performance: Princeton University

\*Project/Proposal Support Start Date: (MM/YYYY): 04/2022

\*Project/Proposal Support End Date: (MM/YYYY): 03/2024

\*Total Award Amount: [REDACTED]

\* Person Months (Calendar/Academic/Summer) per budget period Committed to the Project:

Year	Person Months
2022	1
2023	1

\*Overall Objectives: The goal of the proposed research is to identify the interpersonal neural dynamics that arise during naturalistic social interactions and that predict feelings of social connection that arise as a result of these interactions.

\*Statement of Potential Overlap: None

\*Project/Proposal Title: [REDACTED]

\*Status of Support: current



# Resources: Current & Pending Report

## › Department Responsibilities: Things to look out for

- › PI must have a minimum of 1% committed effort per sponsored project.
- › Project period dates must be current. Do not list recently completed projects.
- › Total person months should not equal more than the available allocation, depending on appointment:
  - › 7CM for a 9-month appointment (see [ODOF policy](#) on AY Duty Time)
  - › 11.5CM for a 12-month appointment
- › C&P (Other) support documents must be certified.
  - › NIH – Certify using DocuSign
  - › NSF – Certify using SciENCv
  - › DOE – Certify using SciENCv



# Resources: Individual Portfolio Report (IPR)

## ➤ How to review the IPR:

- Export the IPR report as an **Excel document** to help you maneuver the report with more ease
- Identify projects with an available balance in the **Spendable Balance** column
- Use the Excel function to hide projects with a \$0.00 balance, internal start-up funds, rebates & unrestricted gifts

1.

Department	Fund	Beginning Balance (A)	Re Est B
[REDACTED]	[REDACTED]	0.00	
[REDACTED]	[REDACTED]	1,001.10	
[REDACTED]	[REDACTED]	151,840.77	
[REDACTED]	[REDACTED]	0.00	
[REDACTED]	[REDACTED]	(118,884.87)	
[REDACTED]	[REDACTED]	248,932.30	

2.

Program	Program Description	Fund Description	Spendable Balance (F) = (D - E)
00000	Doe, John	Research-Rebate-Fund	17,943.89
00000	Doe, John	Science Fund	107,783.66
00000	Doe, John	Faculty-Startup-Fund	0.00
00000	Doe, John	Spon-Res-Holding	(77,176.82)
00000	Doe, John	R F Jeremy Gerryanna	196,982.23
00000	Doe, John	Gerryanna-Redistrict Reform	59,291.31
00000	Doe, John	Schmidt-Future	-0.04
00000	Doe, John	MJS Fndtn-Wang-Gerrymander	2,467.51
00000	Doe, John	EyeCorp-Smartphone-Perf-Usabl	(21,669.50)
00000	Doe, John	Edge-Lectures Pub & Intl Aff	14,292.49
00000	Doe, John	David Halo Project	908.17
00000	Doe, John	Allen-Iverson-Fund	(2,557.13)
00000	Doe, John	Scientific Research	165,600.00
00000	Doe, John	Spon-Res-Holding	(2,057.58)
00000	Doe, John	Gerrymander-Redistrict Reform	(30,764.32)
00000	Doe, John	Highlands Fdn Innov Lab	7,492.17
00000	Doe, John	RAFT Fdn	21,773.72
<b>Total</b>			<b>465,005.89</b>

\* Cost share will be duplicated under both Non-Sponsored and Sponsored sections if the cost share expenditures are associated with your specific Program.



# Resources: Individual Portfolio Report (IPR)

## > How to review the IPR:

- > This leaves you with a much smaller, more manageable list of projects.
- > Share the condensed IPR with your PI and discuss which funds are related to PI's specific research project
- > Any related funds should be reported on the C&P report

3.

	A	B	C	D	E	K
1	<b>Doe, John</b>					
2	Home Department: ORPA					
3	Title:	CWO Disclosure Integrity Workshop				
4						
5	<b><u>Non-Sponsored (Fiscal Year-to-Date Activity)</u></b>					
6						
7	<b>Program</b>	<b>Program Description</b>	<b>Fund Description</b>	<b>Spendable Balance (F) = (D - E)</b>		
8	00000	Doe, John	Science Fund	107,783.66		
9	00000	Doe, John	R F Jeremy Gerryanna	196,982.23		
10	00000	Doe, John	Gerryanna-Redistrict Reform	59,291.31		
11	00000	Doe, John	MJS Fndtn-Wang-Gerrymander	2,467.51		
12	00000	Doe, John	Edge-Lectures Pub & Intl Aff	14,292.49		
13	00000	Doe, John	David Halo Project	908.17		
14	00000	Doe, John	Scientific Research	165,600.00		
15	00000	Doe, John	Highlands Fdn Innov Lab	7,492.17		
16	00000	Doe, John	RAFT Fdn	21,773.72		
17	<b>Total</b>				<b>465,005.89</b>	
18	* Cost share will be duplicated under both Non-Sponsored and Sponsored sections if the cost share expenditures are					
19	associated with your specific Program.					



# Resources: Conflict of Interest (COI) System

- All ODOF appointees (faculty, academic professionals and librarians) are required to complete a COI Disclosure annually.
  - Typically between January and March of each year. Note – disclosures are made for the previous year
  - Updates to the Annual Disclosure form should be made within 30 days of discovery
- Reported appointments/positions/affiliations etc. should be included on the Biosketch.
- Financial information from the COI system may need to be included on the C&P
- This resource is available to you via your Department Manager and GCA.

1.1 Please list all activities below. The table within this section contains information you may have entered last year. To add an entry, please fill the boxes and click the **green check mark button** after each of your entries. To edit or delete existing entries, click on the appropriate button to the right of the pre-populated table within this section (1.1).

In filling out this table, please be aware that effective in 2022 all PIs, co-PIs, and key personnel involved in NIH-sponsored research are required to provide English-translated copies of all contracts, MOUs, agreements, or appointment documents involving foreign organizations or institutions. These contracts/agreements should be sent to [outsidecontracts@princeton.edu](mailto:outsidecontracts@princeton.edu)

Company/Organization (please include whether the organization is foreign/domestic, profit/nonprofit, public or private)	Position/Title, Nature of Work and Relationship with your Activities at Princeton	Number of Days Academic Yr.	Number of Days Summer
██████████ (domestic, nonprofit, private)	Member of Board of Directors	4.0	1.0
██████████	I. █████ consultant II. Analysis and coordination of analytical activities to support the work of the ████████ III. I am director of the ████████, which works on ████████ issues	7.5	0.0
<b>Total:</b>		<b>11.5</b>	<b>1.0</b>



# Version Control

- › Version control is the process by which different drafts and versions of a document or record are managed.
- › Agency specific requirements vary causing department grant managers to maintain different forms for different sponsors.
- › This takes up a lot of time and can create mistakes.
- › What can you do?
  - › SciENCv!
  - › Naming conventions & internal folders

## Bad naming conventions

- Gardner bio\_v3
- Mai Gardner biosketch
- Gardner bio\_Jan 2024
  
- Gardner bio final\_Aug 23
- M\_Gardner bio final\_final
- Gardner bio\_final\_finalpinkypromise

## Good naming conventions

- Gardner Bio\_v3
- Gardner Bio\_v4
- Gardner Bio\_v5
  
- Gardner, M\_08.17.23
- Gardner, M\_11.22.23
- Gardner, M\_01.24.24

# Common Forms coming soon...

- National Science and Technology Council (NSTC) Research Security Subcommittee worked on Common Disclosure forms for the Biosketch and C&P.
- NSTC also worked on a uniform pre- and post-award disclosures table and pairing that with a list definitions, which will hopefully provide more clarity. Table was published 1/23/24.  
[https://www.nsf.gov/bfa/dias/policy/disclosures\\_table/jan2024.pdf](https://www.nsf.gov/bfa/dias/policy/disclosures_table/jan2024.pdf)
- Expected release sometime June/July 2024.
- Each federal funding agency will need to separately approve use of the forms.

[https://www.nsf.gov/bfa/dias/policy/nstc\\_disclosure.jsp](https://www.nsf.gov/bfa/dias/policy/nstc_disclosure.jsp)



# Common Questions & Guidance from Common Forms (CF)

- The biosketch requires listing academic, institutional, and professional appointments and positions. What does this mean?
  - CF provides definitions and examples. See [Appendix of definitions](#).
- Does this include one-time speaking engagement at a conference?
- Does this include informal associations/affiliations or just formal positions?
- Does this include only current positions or all positions (past and current)?
  - CF BIO dtd 11/1/23: List all academic, professional, or institutional appointments and positions, beginning with current appointment.
  - For all domestic and foreign professional appointments and positions outside of the primary organization, faculty needs to only list period up to 3 years from date the proposal is submitted.

# NSPM-33 Definitions Appendix: A Great Resource!

**Institutional appointments and positions** – appointments and positions conveyed in a formal manner (e.g., via appointment letter, executed offer letter, employment contract) by one's primary place of employment or by another organization. For those in academia, the responsibilities of such appointments and positions reside in administration (e.g., president, chancellor, provost, or vice-president; associate or assistant vice-president; vice-provost; associate or assistant vice-provost; dean; associate or assistant dean; department, program, or institute director or chair), though of course such positions also sometimes involve teaching, research, and service. For those outside academia, institutional appointments and positions encompass a wide range of titles (e.g., chief executive officer, chief operating officer, chief technology officer, chief information officer, president, chief research officer; and vice president; regional manager; section, group or project leader, project member). Individuals within both academic and non-academic institutions also may be appointed by their institution to serve in a formal capacity at another organization, foreign or domestic (e.g., as a visiting researcher or faculty member, team member on a corporate project, or as a paid consultant to local, state or Federal organizations). Additionally, individuals within both academic and non-academic institutions may be appointed to an institutional position by an organization or organizations, foreign or domestic, other than their own.

**Conflict of interest** – a situation in which an individual, or the individual's spouse or dependent children, has a significant financial interest, or financial relationship that could directly and significantly affect the design, conduct, reporting, or funding of research.

**Professional appointments and positions** – appointments and positions conveyed in a formal manner (e.g., via appointment letter, executed offer letter, employment contract) by one or more organizations, foreign or domestic, other than one's primary place of employment. They are undertaken owing to the individual's professional expertise (e.g., as a physician, structural engineer, mathematician) and usually are temporary in nature. In most cases, such appointments and positions consist of professional service activities (e.g., serving on or chairing local, state, regional, or national societies, boards, commissions, or committees; or serving as a professional staff member in local, state or Federal offices or agencies – such as a program officer at a Federal funding agency). Professional appointments and positions do not include service at purely charitable or faith-based organizations, or other activities that reside outside the individual's domain of professional expertise.

**Academic appointments and positions** – positions that are identified as personnel on research grants and cooperative agreements where the senior/key person is identified as affiliated with an institution of higher education or on an indexed publication. Academic appointments and positions are those defined in institutional policy, and conveyed in a formal manner (e.g., via appointment letter, executed offer letter, employment contract), that relate to research, teaching, or associated scholarly activities at one or more foreign or domestic institutions. Examples include but are not limited to assistant professor, associate professor, and professor; adjunct and affiliate faculty positions of all ranks; visiting faculty positions of all ranks; visiting scholar or instructor; clinical faculty position of all ranks; lecturer; research faculty position of all ranks; and emeritus faculty position of all ranks. Also included are graduate research and teaching assistants at the master's and doctoral level, as well as post-doctoral scholars. Excluded from this definition are routine academic or university service activities, performed at the departmental, college or institutional level at one's primary or other collaborating institutions, such as serving on or chairing faculty or staff search committees, graduate student research or thesis committees, compliance committees, *ad hoc* task forces, graduate and undergraduate studies committees, capital improvement projects, or faculty governance committees.

**Foreign government-sponsored talent recruitment program** – effort organized, managed, or funded by a foreign government, or a foreign government instrumentality or entity, to recruit science and technology professionals or students (regardless of citizenship or national origin, or whether having a full-time or part-time position). Some foreign government-sponsored talent recruitment programs operate with the intent to import or otherwise acquire from abroad, sometimes through illicit means, proprietary technology or software, unpublished data and methods, and intellectual property to further the military modernization goals and/or economic goals of a foreign government. Many, but not all, programs aim to incentivize the targeted individual to relocate physically to the foreign state for the above purpose. Some programs allow for or encourage continued employment at United States research facilities or receipt of Federal research funds while concurrently working at and/or receiving compensation from a foreign institution, and some direct participants not to disclose their participation to United States entities. Compensation could take many forms including cash, research funding, complimentary foreign travel, honorific titles, career advancement opportunities, promised future compensation, or other types of remuneration or consideration, including in-kind compensation.

<https://www.nsf.gov/bfa/dias/policy/researchprotection/nspm33definitions.pdf>

# Common Questions & Guidance from Common Forms (CF)

- Are you still confused on in-kind support? What is it? In-kind support is a non-cash resource provided by external entity that directly supports the individual's research and development efforts. It can include lab space, equipment, data or data sets, supplies, cell lines & reagents, employees or student resources.
- Do in-kind contributions only need to be disclosed if they involve a time commitment?
  - CF: If there is/will be a time commitment, then provide a reasonable estimate of time. If there is no associated time commitment, then the in-kind contribution does not have to be disclosed.
- How do you report in-kind support on C&P when some of the data elements are not applicable? Do you need to list start/end dates? What about dollar value?
  - CF: Disclose all in-kind contributions with estimated dollar value of \$5k or more. Do not need to disclose if under \$5k.
  - CF: Removed start/end date elements and now use receipt date.

# Common Questions & Guidance from Common Forms (CF)

- What is total award amount? Is it total amount for the project or just portion that will go to the PI for which we are reporting? List total amount coming to Princeton. If we are a sub, then only list sub amount. What if there are 2 PIs at Princeton? Still list total amount to Princeton for both PIs.
- How do you report effort for projects that span 2 calendar years? (CF- Enter the budget period.)
- Do you list prime sponsor or the pass-through entity as sponsor on C&P? (CF – Source of funding needs to be reported by the prime funder.)

# Common Questions & Guidance from Common Forms (CF)

- Students and visiting researchers supported by other sources of funding may need to be listed as an in-kind resource.
- Should list if student or visiting researcher directly supports the faculty's research.
- Awards like DDRIG's that are submitted by the student through the Graduate School are not to be included on a faculty PI's current & pending document.
- Should list if faculty will have a measurable time commitment.
- Not required to list if faculty is only serving in mentor/sponsor role.

# Common Questions & Guidance from Common Forms (CF)

- What about consulting positions? Definitely list on bio if current consulting position. May need to be listed on C&P if consulting activity requires individual to perform research as part of consulting activity. [CF] clarifies 3 instances when disclosure is required:
  - (1) involves performance of research as part of consulting activity;
  - (2) does not involve performing research, but is related to the individual's research portfolio and may impact funding, alter time or effort commitments, or impact scientific integrity; or
  - (3) consulting entity has provided a contract that requires individual to conceal or withhold confidential financial or other ties between the individual and consulting entity.

# Common Questions & Guidance from Common Forms (CF)

- Start-up packages v. start-up companies? List organizational start-up packages from other institutions. List startup company based on non-organization-licensed IP.
- Internal funds? Yes, disclose if it supports faculty's research. Does it have to be project specific? (CF: List internal funds allocated to specific projects.)
- Who makes/submits updates to bios/C&P's? Is it ORPA? Is it the individual researcher? Typically, ORPA submits updates.

# Case Studies

- Faculty disclosed positions on their COI, but forgot to list on bio. We googled companies and noticed their affiliation on company website and reminded them to list on their bio.
- ARO found faculty member had relationships in publications and ORPA and department had to do deeper dive into faculty's internal and external disclosure.
- Faculty member received gift from sanctioned country. Gift appeared on IPR and supported faculty's research. Gift reporting varies by sponsor and luckily disclosure not required for this sponsor.
- Stanford University paid \$1.9M to resolve allegations it failed to disclose foreign research support in federal grant proposals. Settlement reached in October 2023.



# Conclusion

- Know your Sponsor
- Know your PI
- Know where to get information (Resources)
  - This is a partnership! Reach out to ORPA/GCA early.
  - Brown bag luncheons at ORPA.
  - Workshops in your dept.
- Version Control
- All ideas and suggestions welcome!