Guidance: Research Disclosures and Other Support

Responsible Office: Sponsored Programs Administration

Responsible Officer (title only): Assistant Vice President for Research and Sponsored Programs

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Purpose

To assist Principal Investigators with disclosure requirements on sponsored awards.

Reason for this Guidance

Many federal agencies are revising their instructions regarding Other Support. NIU recognizes the importance of providing good stewardship of institutional and sponsored funds. The University’s stewardship responsibilities include complying with federal requirements for disclosing other support (also known as current and pending support).

Guidance

Other Support refers to information about research support that is currently active or pending review. This information may be due at the time a proposal is submitted, may be required before an award is made, or during award as part of progress reporting. It may be referred to differently by different agencies. For example, NSF uses the term “Current and Pending Support” while NIH uses “Other Support”.

Generally, Other Support is used by agencies to determine the amount of effort key personnel have available and to ensure that a particular project is not receiving duplicate funding. It may also be used to identify conflicts of interest and conflicts of commitment.

Agencies request similar, though not uniform, information and provide somewhat ambiguous instructions. Given these factors, below are some clarifying statements to standardize and set expectations for Other/Current and Pending Support documents submitted by NIU.

* It is the Principal Investigator’s responsibility to know the agency’s guidelines and requirements for disclosing and updating other support and to ensure the accuracy of Other/Current and Pending Support documents.
* Information provided by Sponsored Programs Administration staff to assist Principal Investigators in the preparation of Other/Current and Pending Support documents are considered draft documents and include only data available within InfoEd.
* Any activity conducted within the scope of a Principal Investigator’s NIU appointment that provides funding or requires a quantifiable commitment of time must be reported.
  + Commitments are regular obligations of time (part of an investigator’s regular activities, except teaching), but do not include short-term obligations, such as attending a meeting and making a presentation.
  + If an investigator has a quantifiable commitment for an activity but is receiving no additional salary support from the activity, (e.g., cost shared effort) that activity must be reported.
  + Typically, activities that provide funding or have a quantifiable commitment of time are Federal or Non-Federal sponsored projects.
  + Awards resulting from internally funded competitions, such as Research & Artistry, should be included only if there is measurable effort.
* All collaborations and affiliations that provide funding or require a commitment of time must be reported, whether foreign or domestic.
* In the interest of full transparency, err on the side of disclosure.

As appropriate, for your Other/Current and Pending Support documents, please:

* Include the proposal being submitted as a pending proposal.
* Address potential overlap or over-commitments. As this is a primary concern of federal agencies, please be clear in your explanations.
  + An example of a general overlap statement at the time of application: “Adjustments to avoid overlap will be made to my other support prior to funding of this application.”
  + For other support being submitted as Just-in-Time information, more detail should be provided, for example: “If this application is funded, I will reduce my effort on grant XXXX to 1.5 calendar months on award XXXXX.” Or “There will not be overlap since grant XXXXX and XXXXX will both end on August 31, 2022 and the pending project will not begin until December 1, 2022.
* List projects with no-cost extensions.

* Update information as much as possible, e.g., remove outdated proposals or expired awards
* **Notify SPA immediately** of undisclosed Other/Current and Pending Support information that was missing from previously submitted documents.

Principal Investigators and departments should be prepared to respond to an agency’s questions about the information provided in Other Support.

As agency guidance can change, SPA recommends that the investigator/department pay close attention to the sponsor’s instructions in the funding solicitation, policy guide, etc. on how to prepare these documents. Each agency may request slightly different information or require that it be provided following their own format.

Additionally, it is a NIU requirement that faculty and administrative professional employees disclose financial and outside professional activities presently through [Onbase](https://www.niu.edu/academicaffairs/faculty-affairs/outside-employment/index.shtml). Currently NIU requires annual disclosures or any time a change is made. Refer to NIU Outside Consulting, Research and Outside Employment policies and procedures.

**Related Agency Information**

[**National Science Foundation**](https://www.nsf.gov/bfa/dias/policy/cps.jsp)

[**National Institutes of Health**](https://grants.nih.gov/grants/forms/othersupport.htm)

[**Department of Energy**](https://www.directives.doe.gov/news/new-doe-o-486.1)

In 2019, DOE issued [Order 486.1](https://www.directives.doe.gov/news/new-doe-o-486.1) regarding disclosures and prohibitions on foreign funding.

* Refer to the specific DOE Funding Announcement instructions on Current and Pending Support
* See DOE guidance under foreign talent programs below. This guidance applies to joint appointments and contracts with the national laboratories. It does not currently apply to DOE grants.

[**National Aeronautics and Space Administration**](https://researchadministration.caltech.edu/documents/16244/120926_grant_information_circular_-_gic_12-01a_-_nasa-china_restriction.pdf)

* Federal law restricts NASA from providing funding to participate, collaborate or coordinate bilaterally in any way with China or any Chinese-owned company at the prime (NIU) level or at any subrecipient level. This restriction does **not** apply to NIU faculty, staff or students who may be Chinese foreign nationals.

[**USDA National Institute of Food and Agriculture**](file:///C:\Users\Y03DCL1\Documents\Policies\Other%20Support\-%20https:\nifa.usda.gov\sites\default\files\resource\current_pending_0.doc)

[**Department of Defense**](https://cdmrp.army.mil/funding/pa/FY21-BCRP-GAI.pdf)