

## **OSVPRED Procedural Guidance: Disclosure Framework Pursuant to NSPM-33**

### **Rationale/Purpose:**

This guidance is created to:

- Comply with the provisions of federal law, the Office of Management and Budget's regulations, including 2 CFR 200, the Uniform Guidance, the requirements set forth in National Security Policy Memorandum (NSPM)-33, and other relevant sponsor requirements.
- Establish expectations with faculty and staff about other support information.
- Promote the best possible alignment between faculty and staff activity and funding sources and, in so doing, enhance work at Auburn University.

Auburn University recognizes the importance of providing good stewardship of institutional and extramural funds. The university's stewardship responsibilities include complying with federal requirements for disclosing other support (also known as current and pending support). Other support includes active, pending, or previous sources of support (including, but not limited to, grants, contracts, gifts, in-kind contributions, foreign support) for a faculty member's research and other sponsored activities.

Sponsoring agencies request information on other support as part of the proposal process, often prior to the issuance of an award, or as part of the annual progress report/RPPR process. Sponsors use the information to ensure that scientific, budgetary, or commitment overlap do not occur. The requirement for disclosure is in place to demonstrate that:

- The funding agency is not providing funds for work that is already supported by another source;
- The faculty member has sufficient time available to conduct the work for which funds are being requested; and
- Only funds necessary to conduct the approved project are included in the award.

Additionally, there is increased scrutiny in the federal government on undue foreign influence on the U.S. research enterprise, and federal sponsors have emphasized that appropriate disclosures must be made as part of other support documents.

### **Scope:**

All faculty and staff who engage in or propose to engage in any sponsored projects whether federal or non-federal.

**Requirements:**

- I. All researchers who engage in sponsored projects will comply with federal law, university policies and procedures, and sponsoring agency requirements regarding the provision of information on other support documents.
- II. Every disclosure to an external funding agency of a researcher's active, pending, or previous sources of support for research and other sponsored activities will be current, accurate, and complete to the best of the researcher's knowledge.
  - A. This requirement applies regardless of the source of support, whether or not Auburn University is the recipient of the support. For example, if a researcher with a joint appointment is listed as Senior/Key Personnel (Principal Investigator, Co-Principal Investigator, Co-Investigator, etc.) on an award to another institution, that must be disclosed in other support.
  - B. The requirement for disclosure applies at the time of proposal submission, prior to the award of support, as part of the annual progress report/RPPR, and at any subsequent time the sponsor determines appropriate during the term of the award.
- III. It is each investigator's responsibility to ensure the accuracy of their other support documents, in accordance with the application guidelines or the sponsor's instructions.
- IV. All disclosures must be truthful, complete, and current. False, fictitious, or fraudulent statements or claims (including intentional omissions) in violation of this procedural guidance may result in university and sponsor administrative, civil, or criminal penalties.

Auburn University is committed to fostering a culture of integrity, transparency, and global collaboration—these guidelines support that mission.

## Sponsor-Specific Disclosure Requirements Table

Sponsor	Disclosure Requirement	Key Points	Official Guidance / Forms
National Institutes of Health	Other Support	Must disclose all active and pending support, including foreign and domestic sources, in-kind contributions, and appointments at other institutions.	<a href="https://grants.nih.gov/grants-process/write-application/forms-directory/other-support">https://grants.nih.gov/grants-process/write-application/forms-directory/other-support</a>
National Science Foundation	Current and Pending Support	Disclose all sources of support (active and pending), including foreign support and in-kind contributions. Use the NSF-approved Common Form.	<a href="https://www.nsf.gov/bfa/dias/policy/nspm-33-implementation-guidance">https://www.nsf.gov/bfa/dias/policy/nspm-33-implementation-guidance</a>
NASA	Current and Pending Support	Disclose all active and pending support, including foreign support, as part of the proposal and annual reporting process.	<a href="https://www.nasa.gov/grants-policy-and-compliance-team/">https://www.nasa.gov/grants-policy-and-compliance-team/</a>
Department of Energy	Current and Pending Support	Disclose all sources of support, including foreign support and appointments, at proposal and reporting stages.	<a href="https://science.osti.gov/grants/policy-and-guidance">https://science.osti.gov/grants/policy-and-guidance</a>
Department of Defense	Other Support/ Biographical Sketch	Disclose all active and pending support, including foreign support, as required by Section 223 of the NDAA FY2021.	<a href="https://www.aau.edu/sites/default/files/Blind-Links/OUSDResearchProtectionMemo.pdf">https://www.aau.edu/sites/default/files/Blind-Links/OUSDResearchProtectionMemo.pdf</a>
USDA	Current and Pending Support	Disclose all sources of support, including foreign support, at proposal and reporting stages.	<a href="https://www.nifa.usda.gov/grants/regulations-and-guidelines">https://www.nifa.usda.gov/grants/regulations-and-guidelines</a>