Clemson University

DISCLOSURE REQUIREMENTS
Current & Pending/Biosketch
Effective January 2023

Guidance for Proposal Submissions

SciENcv and ORCID Demo
What is Changing (effective January 30, 2023)

Information that must be reported:
- Current and Pending or Other Support Documents
- Biosketch Information
- PI Certification of both documents
- Digital Persistent Identifier (ORCID)
- Standard Forms
- Special Note on NIH
Why the Change?

National Security Presidential Memo

• Diversion of intellectual property to foreign entities
• Threats to national security and economic competitiveness
• Disclosing confidential grant application information to 3rd parties
• Failure to disclose research resources and support provided by other organizations, including foreign entities and foreign governments
Background

• Presidential Memorandum on US Government Research and Development National Security Policy (NSPM-33) - Issued January 14, 2021

• Tasks federal research funding agencies with establishing standardized policies and forms on disclosure requirements for researchers regarding positions, other support, affiliations, and activities with foreign government-sponsored talent recruitment programs (FGSTP)

• Standardized disclosure information released on August 31, 2022, for public comment (closed on 10/31/22)

• Takes effect January 2023
How does this impact investigators?

- Applies to ALL senior/key investigators submitting applications to federal gov’t agencies (generally does not include students)
- **Expanded Researcher Disclosure Requirements (Current & Pending/Other Support, Biosketch)**
- Certification of accuracy and completeness – all submissions and progress reports
- Use of SciENcv and Digital Persistent Identifiers (ORCID) to Facilitate Disclosure
What to Disclose – Biosketch

• Academic, professional or institutional appointments and positions, *whether or not remuneration is received*, and, whether *full-time, part-time, or voluntary*

• Certification
What to Disclose – Current & Pending/Other Support

All resources made available, or expected to be made available, to an individual in support of the individual’s research and development efforts, regardless of (i) whether the source of the resource is foreign or domestic; (ii) whether the resource is made available through the entity applying for an R&D award or directly to the individual; or (iii) whether the resource has monetary value.
What to Disclose – Current & Pending/Other Support

• In-kind contributions and development efforts, such as requiring a commitment of time and directly supporting the individual's research, the provision of office or laboratory space, equipment, supplies, employees, or students
• Contracts associated with participation in foreign government-sponsored talent recruitment programs
• Direct or Indirect support that is funded by a foreign government
• Consulting activities not approved by the home institution
• Start-up packages from institutions other than the home institution
• Travel for R&D paid by an external entity with a time commitment
• Start-up company based on non-organization licensed IP
When to Disclose – Current & Pending/Other Support

• At time of application submission or Just-In-Time
• At time of award – if undisclosed at time of submission
• Annual Progress Reports
• When hiring new senior/key personnel during project performance (usually 30 days from hire)
Institutional Disclosure Requirements

Research institutions must certify that they have made the research community aware of disclosure requirements; failure to comply with those requirements can result in civil or criminal liability.
Institutional Disclosure Requirements

Dear Principal Investigator,

Effective January 30, 2023, federal agency sponsors have adopted new disclosure requirements for current and pending/other support and biosketch proposal documents. Please make sure to follow exactly the information requested in the specific guidelines for this submission. If no instructions are provided, use the chart below. Please make sure to share this information with all co-investigators and senior/key personnel on this project. Your pre-award office personnel can assist you with this information.
SciENcv and ORCID Demo

Dr. Brooke Whitworth

• NSF requiring all biosketch and current and pending documents be prepared using SciENcv for all applications submitted on or after October 23, 2023

• Certification is required

• Most agencies request current and pending and biosketch documents in the NSF format

• Delegates are allowable to assist with data entry, but they cannot certify
Resources

• NSPM-33 Disclosure Requirements Table – View here.
• NSF Disclosure Requirements Table – View here.
• NIH Disclosure Requirements Table – View here.
• ORCID – Login page here.
• SciENcv – Login page here.
• NIH Other Support Form – View here.
Contact Information

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College Pre-Award Offices

https://www.clemson.edu/research/division-of-research/offices/department-osp/researchers/support-center.html
Questions?