



Division of
RESEARCH

Clemson University

DISCLOSURE REQUIREMENTS
Current & Pending/Biosketch
Effective January 2023

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Cooper Library



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 Compliance

Dear Principal Investigator,

In recent months, sponsors have implemented very specific requirements for disclosure of current and pending sources of support as part of their submission package. Please make sure to provide the information requested in sponsor guidelines. If this application will be submitted to the National Science Foundation or the National Institutes of Health, their disclosure requirements are linked below. As other agencies post their standard instructions they will be added to this communication. Please make sure to share this information with co-investigators and other senior/key personnel on this project. If you have questions about what to disclose, contact the Office of Sponsored Programs at cuosp@clemson.edu for assistance.



Resources

- NSPM-33 Disclosure Requirements Table – View [here](#).
- ORCID – Login page [here](#).
- SciENcv – Login page [here](#).
- NSF January 19, 2023 (3 pm ET) Webinar on Biosketch & Current and Pending Forms in SciENcv – Register [here](#).
- Office of Research Development Webinar on SciENcv – Spring 2022 – View [here](#).
- NIH Other Support Form – View [here](#).



Contact Information

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Questions?