

Sponsored Programs Administration Other Support Disclosure Requirements

UMB Research Security Team
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Overview

The [NSF Research Security Consolidated Training](#) covers all training requirements as mandated. To ensure researchers have access to a wealth of information, UMB further developed and offers this supplement as an additional resource on National Institutes of Health (NIH) disclosure requirements and disclosures to the University.

Audience: Covered Individuals defined as Senior/Key Personnel on federally-funded projects, or projects with federal flow-through.

A disclosure is a formal and documented process of providing certain information prior to applying for federal funding and periodically throughout the funding award lifecycle:

- Current and Pending sources of research funding or in-kind support
- Outside employment
- Business ownership or a significant stake in a company, appointments, and affiliations

NIH Disclosures: Senior/Key Personnel

- Reporting of Other Support is required for all individuals designated as Senior/Key Personnel – those devoting measurable effort to a project.
 - Senior/Key Personnel: The PD/PI and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not salary or compensation is received under the grant.
- Each PD/PI or other Senior/Key Personnel must electronically sign their respective Other Support forms prior to submission. **This signature certifies that the statements are true, complete, and accurate.**
- Information on Other Support is not specifically requested for Program Directors, training faculty, and other individuals involved in the oversight of training grants since applicable information is collected in other sections of a training grant application. It is also not requested for individuals categorized as Other Significant Contributors. Refer to [Types of Team Roles](#) for further information.

Other Support: Resources

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 is foreign or domestic; (ii) whether the resource is made available through the entity applying for a research and development award or directly to the individual; or (iii) whether the resource has monetary value.

Current

all active projects, or projects with ongoing obligations, from whatever source irrespective of whether such support is provided through the proposing organization or is provided directly to the individual.

Pending

any proposal that is being considered for funding from a potential funding organization irrespective of whether such support is provided through the proposing organization or is provided directly to the individual.

Other Support: In-kind Contributions

Includes **all** in-kind contributions with an estimated dollar value of \$5000 or more **and** that require a commitment of the individual's time. An in-kind contribution is a non-cash contribution provided by an external entity that directly supports the individuals' research and development efforts. An in-kind contribution may include but is not limited to: real property; laboratory space; equipment; data or data sets; supplies; other expendable property; goods and services; employee or student resources.

Current

all in-kind contributions obligated from whatever source irrespective of whether such support is provided through the proposing organization or is provided directly to the individual.

Pending

all in-kind contributions currently under consideration from potential funding organizations irrespective of whether such support is provided through the proposing organization or is provided directly to the individual.



Other Support: Consulting Activities

Consulting activities must be disclosed under the proposals and active projects section of the form when any of the following scenarios apply:

- require the senior/key person to perform research as part of the consulting activity;
- consulting activity does not involve performing research, but is related to the senior/key person's research portfolio and may have the ability to impact funding, alter time or effort commitments, or otherwise impact scientific integrity; **or**
- consulting entity has provided a contract that requires the senior/key person to conceal or withhold confidential financial or other ties between the senior/key person and the entity, irrespective of the duration of the engagement.

****Consistent with NSPM-33, individuals are required to disclose contracts associated with participation in programs sponsored by foreign governments, instrumentalities, or entities, including foreign government-sponsored talent recruitment programs.****

NIH Disclosure Forms

Disclosures to the NIH are made using the Biographical Sketch, Current and Pending (Other) Support, and Research Performance Progress Reports.

Biographical Sketch

- assess the capacity of the individual to carry out the proposed research
- identify potential overlap/duplication with the project being proposed

Current and Pending (Other) Support

- assess the capacity or any conflicts of commitment that may impact the ability of the individual to carry out the research effort as proposed
- identify potential scientific and budgetary overlap/duplication with the project being proposed

Research Performance Progress Report (Annual)

- required for federally-funded research projects to ensure accountability
- tracks, documents, and conveys the progress and financial status of the project



NIH Disclosures: Tips

- When a recipient organization discovers that a PI or other Senior/Key Personnel on an active NIH grant failed to disclose Other Support information outside of Just-in-Time or the Research Performance Progress Report, as applicable, the recipient must submit updated Other Support to the Grants Management Specialist named in the Notice of Award **as soon as it becomes known.** ✓
- For Other Support submissions that include foreign activities and resources, recipients are required to submit copies of contracts, grants, or any other agreement specific to Senior/Key Personnel foreign appointments and/or employment with a foreign institution as supporting documentation. ✓
- **DO NOT INCLUDE in Other Support:**
 - Institutional resources that are broadly available (e.g., core facilities, shared equipment) ✗
 - Training awards, prizes, or gifts (unless they come with expectations of time or services) ✗
- **CLARIFICATIONS of In-Kind Contributions:**
 - If the in-kind contribution ***IS NOT*** intended for use on the proposed project, it must still be reported in the **Other Support** document.
 - If the in-kind contribution ***IS*** intended for use on the proposed NIH project, include it in the **Facilities and Other Resources** or **Equipment** section of the application.
 - If monetary value is unknown, include a reasonable estimate of the contribution

NIH Disclosures: Institute/Center Review

The Institute or Center scientific program and grants management staff review information disclosed before the award to ensure:

- sufficient levels of effort are committed to the project;
- there is no budgetary, scientific, or commitment overlap

Budgetary	Scientific	Commitment
The application includes duplicate or equivalent budgetary items (such as equipment or salaries) already paid for by another source.	The core research plan is proposed in more than one application or has multiple funding sources for review and funding consideration. A specific research aim and/or experimental design closely related to multiple applications or awards, regardless of funding source.	An individual's time commitment exceeds 100% (i.e., 12 person months), irrespective of whether salary support is requested in the application.



SFI Disclosures to UMB

Significant Financial Interest (SFI)

Any financial interest belonging to an investigator, their spouse, or dependent children that could reasonably relate to their institutional responsibilities.

Financial Conflicts of Interest (FCOI)

Exist if the SFI could directly and significantly affect the design, conduct, or reporting of federally-funded research.

Conflict of Interest (COI) Officer

UMB's institutional official solicits and reviews disclosures of SFI from each Investigator who is planning to participate in, or is currently participating in, federally-funded research. The COI Officer will determine whether any SFI are related and if an FCOI exists.

Key Components of an SFI

Remuneration Payment for salary or service received from an entity in the 12 months prior to a disclosure. (i.e., consulting fees, paid authorship, honoraria.)	Intellectual Property Income from patents, copyrights, or other intellectual property rights.	Equity Interest Any ownership in a company, such as stocks or stock options.	Sponsored Travel Expenses paid for by an entity on behalf of the Investigator, not reimbursed directly to the Investigator.
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Disclosures to UMB

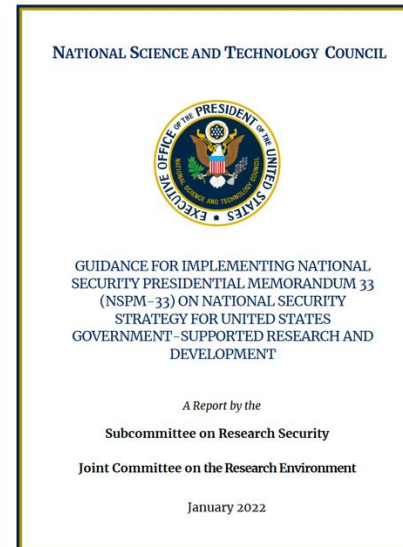
	What to Disclose	When to Disclose
An investigator planning to participate in, or participating in, federally-funded research	Any SFI of the investigator and their spouse or dependent children that appears to relate to the investigator's institutional responsibilities.	• At or before proposal submission for federally-funded research. • At least annually during the period of the federally-funded research, no later than 365 days from the beginning of each fiscal year of the award. • Within 30 days of discovering or acquiring a new SFI.
Additional Annual Disclosure Requirements	• New information not disclosed either initially or subsequently. • SFI identified on a federally-funded project transferred from another institution. • Updated information regarding previously disclosed SFI. • Updated value of a previously disclosed equity interest. <i>*Annual updates must be provided in a federally funded research project, whether or not an SFI was previously disclosed.*</i>	Annually
Information Required for Disclosure	• Amount of remuneration received from any entity in the twelve (12) months preceding disclosure. • If there is an equity interest in the entity, the value on the date of disclosure. • For reimbursed or sponsored travel expenses, the purpose of the trip, the identity of the sponsor/organizer, destination, and duration of travel.	As needed

Resources/Contacts

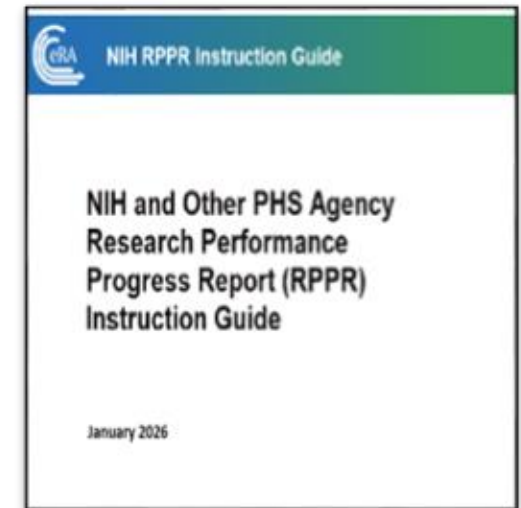
- [Assistant Director, Sponsored Programs Administration](#)
- [NIH Grants and Funding](#)
- [Just-in-Time Procedures](#)
- [NIH Other Support Reporting](#)
- [Disclosure Information, Research Security](#)

[NIH Disclosure Table](#)

[Federal Disclosure Table](#)



[NSPM-33 Implementation Guidance](#)



[NIH RPPR Guidance](#)