



Office of the Vice Provost for Research

Disclosure Requirements for Federally-Funded Researchers

INTRODUCTION

The Federal Government's concern about research security risks to the U.S. research enterprise has resulted in new disclosure obligations for federally-funded researchers. Many of these disclosure requirements are specific to the sponsoring agency and are subject to change. Furthermore, as noted in the *Implementation Guidance for National Security Presidential Memorandum 33* (NSPM-33), "violation of disclosure requirements may lead to criminal, civil, and/or administrative consequences." Consequently, it is critical that federally-funded researchers at Boston College properly report their external activities and support to the University and to their federal sponsors.

POLICY

Boston College Faculty or Staff researchers who are federally-funded and meet the definition of "[Covered Individuals](#)" or "[Senior/Key Personnel](#)" are required to fully and consistently disclose all of their external support, activities, and commitments. Specifically, federally-funded researchers at Boston College are required to:

- Successfully complete annual *Research Security Training*, which includes instruction on *Other Support* Disclosure obligations.
- Disclose all resources made available to them in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are based at the institution the researcher identifies for the current grant.
- Disclose their foreign affiliations and activities at the time of proposal, via *Biographical Sketches (Biosketches)*; *Current and Pending (Other) Support*; *Other Support*; and *Facilities, Equipment & Other Resources* pages.
- Update these documents, as well as *Research Performance Progress Reports (RPPRs)*, throughout the life of an award. *RPPRs* must indicate any change in support for all key personnel that occurred over the period covered by the report.

Researchers should always review and follow the specific funding opportunity announcement, application instructions, and sponsor guidelines before submitting any materials to a sponsor.

RESOURCES

[NSPM-33 Implementation Guidance Pre- and Post-Award Disclosures Relating to the Biographical Sketch and Current and Pending \(Other\) Support](#)

[NIH Pre-award and Post-award Disclosures Relating to the Biographical Sketch and Other Support](#)

[COGR Matrix of Science & Security Laws, Regulations, and Policies](#)

DEFINITIONS (*per NSPM-33 Implementation Guidance*)

Covered individual or Senior/key personnel – an individual who (a) contributes in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a research and development award from a Federal research agency; and (b) is designated as a covered individual by the Federal research agency concerned. Consistent with NSPM-33, this means principal investigators (PIs) and other senior/key personnel seeking or receiving Federal research and development funding (i.e., extramural funding) and researchers at Federal agency laboratories and facilities (i.e., intramural researchers, whether or not federally employed), including Government-owned, contractor-operated laboratories and facilities.

Current and Pending Research Support – (a) 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; and (b) includes in-kind contributions requiring a commitment of time and directly supporting the individual’s research and development efforts, such as the provision of office or laboratory space, equipment, supplies, employees, or students. This term has the same meaning as the term **Other Support** as applied to researchers in NSPM-33. For researchers, Other Support includes *all* resources made available to a researcher in support of and/or related to *all* of their professional R&D efforts, including resources provided directly to the individual rather than through the research organization, and regardless of whether or not they have monetary value (e.g., even if the support received is only in-kind, such as office/laboratory space, equipment, supplies, or employees). This includes resource and/or financial support from all foreign and domestic entities, including but not limited to, gifts provided with terms or conditions, financial support for laboratory personnel, and participation of student and visiting researchers supported by other sources of funding.

RESPONSIBLE OFFICES

This policy will be implemented by the VPR’s Office of Research Security, Integrity, and Compliance, and the VPR’s Office of Sponsored Programs.