| Topic | Definition | NIH | NSF | DOD | DoE | NASA |
| --- | --- | --- | --- | --- | --- | --- |
| Disclosure of Appointments | * All appointments paid or unpaid must be disclosed. Positions and scientific appointments, whether or not remuneration is received. A specific example is an honorary, visiting or adjunct appointment at a foreign university. | All positions and scientific appointments both domestic and foreign held by senior/key personnel including foreign entities or governments must be addressed. UMBC’S Office of Sponsored Programs recommends this be addressed in the Biographical Sketch. | The NSF biographical sketch must include a list, in reverse chronological order, of all the individual’s academic/professional appointments beginning with the current appointment. Appointments include any titled academic, professional, or institutional position **whether or not remuneration is received**. |  | Currently, DoE directives apply to the Federally Funded Laboratories. A separate policy directive for DoE supported research and cooperative grants is forthcoming | NASA restricts the use of NASA funded awards to “participate, collaborate, or coordinate bilaterally in any way with China or any Chinese -owned company at the prime or subrecipient level”. |
| Disclosure of Support | Resources and/or financial support from foreign and domestic entities must be reported as Other Support. This includes all resources made available to a researcher in support of, and/or related to, all of their research endeavors. By way of example, all senior/key personnel on a proposal or award must list:   * Resources and other support provided directly to the senior/key personnel for their research efforts (whether directly to the individual or through their institution). * In-kind support, such as lab space, equipment or supplies. It can also take the form of selection to a foreign talent program or similar type program. | Disclosure of all Support funded or unfunded must be identified during the application process in the Other Support or at the Just-in-Time response. “Applicants are responsible for promptly notifying NIH of any substantive changes to previously submitted Just-in-Time information up to the time of award, including “Other Support” changes that must be assessed for budgetary or scientific overlap.” | The NSF Current and Pending must now include: -Information must be provided for all current and pending support irrespective of whether such support is provided through the proposing organization or directly to the individual.  -non-profit organizations and consulting agreements.  -All projects and activities that require a time commitment must be reported (no minimum has been established), even if the support received is only in-kind.  Additionally, new electronic format (or formats) will be implemented to collect current and pending information. Upload of pdf will no longer be permitted |  |  |  |
| Disclosure of Collaborations | All collaborations with foreign or domestic entities must be disclosed. These collaborations may include exchanges of personnel, materials, data, or other significant activity likely to result in co-authorship. | Disclosure of collaborations with foreign or domestic parties must be identified. UMBC’s OSP recommends disclosing such information in the “Facilities, Equipment and Other Resources” section of the submission. | All Collaborators and Other Affiliations must be provided for all Investigators and Senior Personnel identified using the NSF COA template spreadsheet |  |  |  |
| Disclosure of Support for Foreign Travel | If a project includes foreign travel that will be funded from a source other than the extramural award or institutional funds, the source of that support must be disclosed. | Disclosure of Foreign or Domestic Travel requires NIH prior approval. | NSF has not provided specific guidance on this. UMBC OSP recommends using “Facilities, Equipment and Other Resources” document to disclose this information |  |  |  |
| Disclosure of Foreign Support for Personnel | If any personnel, including students, will be involved in the proposed project and those personnel are supported by foreign sources of funding it must be disclosed. | Disclose all resources of Foreign Support for persons designated as senior/key personnel in the Other Support section. Disclose all resources of Foreign Support for persons not designated as senior/key persons in the “Facilities, Equipment and Other Resources” section. | NSF has not provided specific guidance on this. UMBC OSP recommends using “Facilities, Equipment and Other Resources” document to disclose this information |  |  |  |
| Disclosure of Consulting Activity  DIRECTLY FROM CORNELL UNIV. | All time spent working for or consulting with foreign entities or institutions must be reported to the university regardless of whether such activity is conducted in your professional or personal capacity. University policy governs this activity, but individual consulting contracts are negotiated and executed by faculty in their personal capacity and do not go through the university system. Annual Conflict of Interest (COI) reports must include the approximate number of days spent internationally in paid or unpaid engagements with foreign governmental bodies and/or foreign institutions of higher education, including affiliated academic teaching hospitals, medical centers, or research centers. | All consulting activities must be disclosed in Other Support at the time of submission or during the Just-In-Time. | Consulting activities must be included on the NSF Current and Pending |  |  |  |

Key items to remember:

* If adding a foreign component to an existing award, agency prior approval may be required. For specific guidelines or requirements, refer to the agency policy, your award document, and contact the Office of Sponsored Programs (OSP) for assistance.
* If other support is obtained after the initial award period, from any source either through the institution or directly to senior/key personnel, those details must be disclosed in the annual progress report.
* Do not allow unsolicited, unscheduled, and unsupervised on-site visits.

If any of the above were not disclosed at time of proposal or if they change during the course of the award the must be disclosed in the next technical report.

These requirements are in response to recent Federal actions and requirements. These requirements are changing rapidly and the UMBC Office of the Vice President will continue to update processes in response to change in Federal requirements. Many of those requirements are not completely clear and UMBC is doing its best to be compliant. If you have any questions, please contact your OSP manager as early as possible.

As additional agencies release updates they will be added.