

Identifying all Sources of Support in Proposals for External Funding

Federal sponsors are focusing more closely on the full disclosure of project support than in years past. There is concern about ‘under-reporting’ of available research funding and of foreign sources of research support (i.e., foreign components, defined below). It is critically important that complete and accurate information about research support is included in all grant and contract proposals whenever required. This requirement will vary from sponsor to sponsor, so be sure to include other support information in conformance with each Agency’s instructions.

NIH Other Support – Information on other active and pending support may be requested by NIH to ensure there is no scientific budgetary or commitment overlap. This applies to proposals, Just-in-Time and RPPR progress reports. Specifically, NIH requires that Other Support include:

“...all financial resources, whether Federal, non-Federal, commercial or institutional, available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts, and/or institutional awards. Training awards, prizes, or gifts do not need to be included.”

Full details and resources are found [here](#).

NSF Current and Pending Support – NSF requires that “all current project support from whatever source (e.g., Federal, State, local, foreign, public or private foundations, industrial or other commercial organizations, or internal funds allocated toward specific projects) be listed in a proposal. The proposed project and all other projects or activities requiring a portion of time of the PI and any other senior personnel must be included, even if they receive no salary support from the project(s). The total award amount for the entire award period covered (including indirect costs) must be shown as well as the number of person-months per year to be devoted to the project, regardless of source of support.”

Full details and resources are found [here](#).

Department of Defense (DoD) – all new DoD Notices of Funding Opportunities (NFOs) pertaining to research and research-related educational activities will now include the following requirements:

Proposers must submit the below information **for all key personnel, whether or not the individuals' efforts under the project are to be funded by the DoD:**

- A list of all current projects the individual is working on, in addition to any future support the individual has applied to receive, regardless of the source.

- Title and objectives of the other research projects.
- The percentage per year to be devoted to the other projects.
- The total amount of support the individual is receiving in connection to each of the other research projects or will receive if other proposals are awarded.
- Name and address of the agencies and/or other parties supporting the other research projects.
- Period of performance for the other research projects.

Disclosure of Foreign Components to Federal Agencies

There is heightened concern from federal agencies about the lack of disclosure of collaborations with, and/or funding by, foreign entities. This includes both foreign governments and foreign institutions of higher education. Here again, each agency provides its own definition of what constitutes a “foreign” or “international” component.

NIH’s comprehensive definition of a foreign component can be found [here](#). It includes:

- collaborations with investigators at a foreign site anticipated to result in co-authorship
- use of facilities or instrumentation at a foreign site;
- receipt of financial support or resources from a foreign entity.

Foreign travel for consultation is **not** considered a foreign component.

Disclosure of a Foreign component to the NIH:

There are multiple ways in which foreign components can be appropriately disclosed to NIH. For example:

- Identifying a “foreign component” in an NIH grant application;
- Listing a “non-U.S. performance site”;
- Identifying foreign relationships and activities in a Biosketch;
- Checking “yes” to the question on the Cover Page Supplement Form asking, “Does this project involve activities outside of the United States or partnerships with international collaborators?”

NIH employs the Foreign Award and Component Tracking System ([FACTS](#)) system to record all activities involving foreign countries.

NSF asks for information on International Activities on the Cover sheet with the following instruction:

“For each proposal that describes an international activity, proposers should list the primary countries involved. An international activity is defined as research, training, and/or education carried out in cooperation with international counterparts either overseas or in the U.S. using virtual technologies. Proposers also should enter the country/countries with which project participants will engage and/or travel to attend international conferences.”

A fuller definition of International Activities is found [here](#).

Other Agency Positions: DOE & NASA

In other agency actions, the **Department of Energy (DOE)** issued a notice in February 2019 announcing its intention to require “federal and contractor personnel fully disclose and, as necessary, terminate affiliations with foreign government-supported talent recruitment programs.”

It is anticipated that DOE may similarly restrict grantees from participating in foreign talent recruitment programs of countries deemed “sensitive” by DOE. It is therefore prudent for Brown investigators to carefully evaluate any existing or planned participation in foreign government-supported talent recruitment programs.

NASA has had a longstanding prohibition in its agency appropriation language with respect to the People’s Republic of China (PRC) and Chinese-owned companies. Since 2011, NASA is restricted from using funds to enter into or fund any grant, cooperative agreement or contract to participate, collaborate, or coordinate bilaterally in any way with PRC or any Chinese-owned company.

Should you identify an omission or error in a previously submitted proposal, you must contact your ORPA RA. They will work with you to determine how best to update this information with the relevant sponsor. Your ORPA RA is also available to answer any questions you may have about these requirements.