

# TIPS AND TOOLS FOR PREPARING INVESTIGATOR DISCLOSURES ON BIOSKETCHES AND CURRENT & PENDING SUPPORT

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# Meet Your Presenters

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# Plan For Today

## Agenda:

- Welcome & introductions
- The current federal research security landscape
- Comparing disclosure requirements across agencies and common pitfalls
- Live demo of SciENcv
- Addressing errors and red flags
- Case studies

## Learning Objectives:

- Understand new research security and disclosure expectations.
- Distinguish biographical sketch and other support requirements across major agencies.
- Apply best practices for SciENcv and ORCID ID
- Identify errors and red flags
- Support faculty with compliant and timely documentation.

# Poll #1- What area of research administration do you work in? (Choose one)

1. Central Office (Pre-Award)
2. Central Office (Post Award)
3. Central Office (Both)
4. Department/ College/ School/ Center
5. Research Compliance or Research Security

# Poll #2- What's the most important topic for you? (Choose one)

1. Research Security Requirements
2. Other Support Disclosure Requirements
3. ORCID integration
4. Using SciENcv
5. Best Practices for Supporting Faculty

# Federal Research Security Landscape

Protect research from undue foreign influence.

Promote open, transparent collaborations.

Enhance consistency in disclosure and  
cybersecurity expectations.

# NATIONAL SECURITY PRESIDENTIAL MEMORANDUM 33



NSPM-33, issued on January 14, 2021, directs a national response intended to safeguard the security and integrity of federally-funded R&D in the United States.

Directive from the President requiring all federal research funding agencies to strengthen and standardize disclosure requirements for federally funded awards.

In addition, it also mandates the establishment of research security programs at major institutions receiving federal funds.

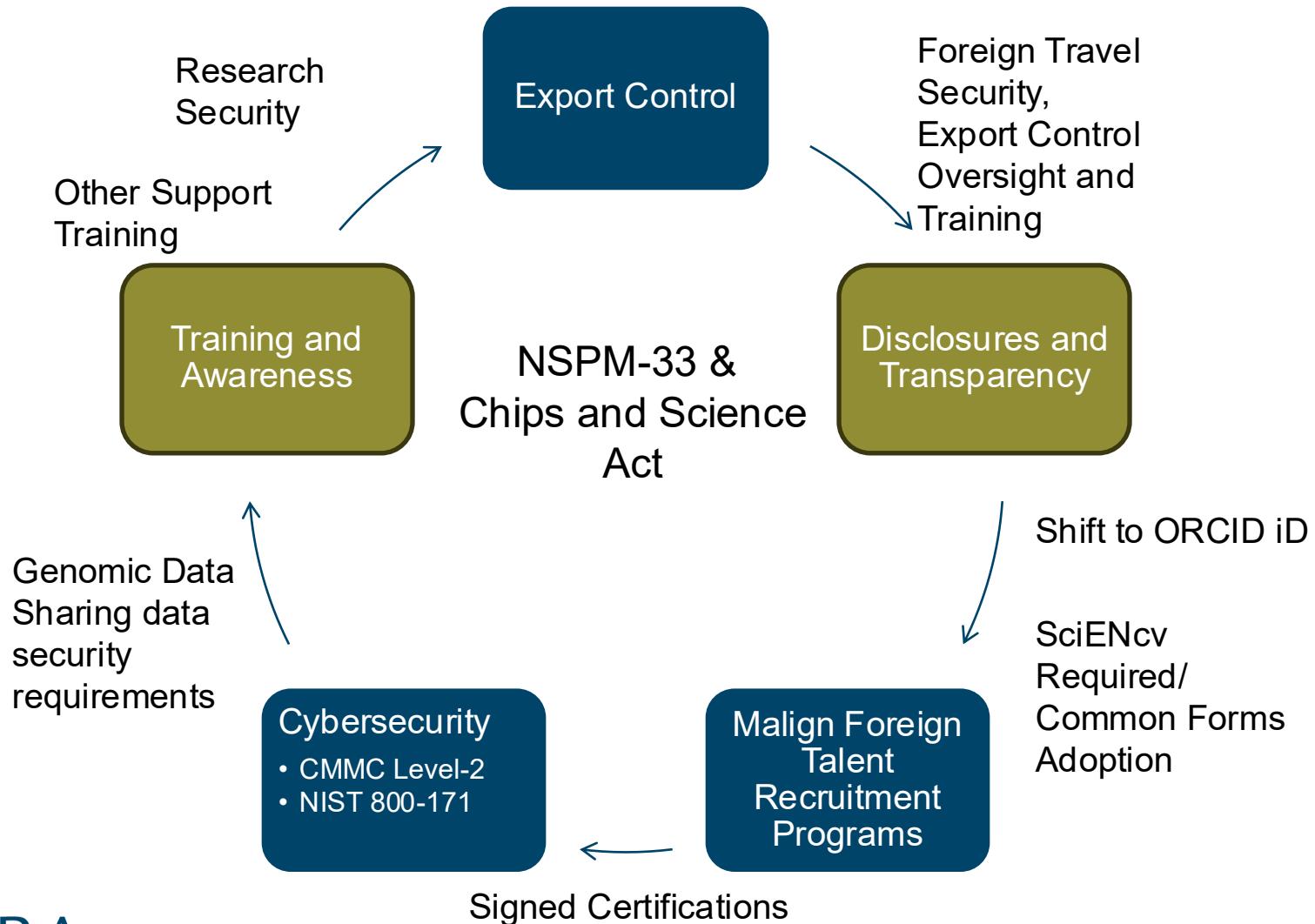
# National Security Presidential Memorandum-33 (NSPM-33)

Institutions that receive over \$50 million in Federal research funding must establish a research security program

- Cybersecurity, Foreign Travel Security, Research Security Training, and Export Control Training

Funding agencies must standardize disclosure processes and coordinate with Office of Science Technology Policy and the National Science and Technology Council - Research Security Subcommittee

- Biosketches and Current and Pending Support



# CHIPS & Science Act (NSF, DOE)

The CHIPS and Science Act of 2022 significantly expands the U.S. research security regime by embedding requirements designed to protect federally-funded research from foreign interference, loss of intellectual property (IP), and undue foreign influence.

- It mandates that individuals applying for or participating in R&D awards must certify they are **not** part of “malign foreign talent recruitment programs”
- must complete annual research-security training.

# Where have we been, it's been a year...

What	Impact	Reference	Effective Date
NIH Updated Application Forms (FORMS-I)	<b>Minor Change</b> , mostly of interest to administrators and IT systems managers	NOT-OD-24-086	1/25/25
DOE Requires Research Security Training for covered individuals	<b>Major Change</b> , RST for PIs	FAL 2025-02	5/1/25
NIH Common Forms for Biographical Sketch and Current and Pending (Other) Support	<b>Major Change</b> for faculty and administrators	NOT-OD-24-163	5/25/25
DoD CDMRP implements Common Form	<b>Major Change</b> , Implementation of Common Forms	GAI, version CD25_01	6/11/25
NSF Research Security Training required for key persons.	<b>Major Change</b> : RST for Key	Important Notice No. 149	10/10/2025

# National Shift Toward Standardized Disclosures

National push for transparency and integrity in federally funded research.

Alignment across NIH, NSF, DOE, and DOD via common forms.

Focus on disclosing all research activities and support regardless of source.

# Common Forms Implementation (as of Sept/Oct 2025)

Federal Agency	Common Forms	Notes
NSF	Yes (SciENcv)	Common Form: Yes MFTP Cert: Yes Research Security Training: Yes 10/10/25
NIH	No (SciENcv, preview cannot be used yet)	Common Form: No (1) MFTP Cert: No Research Security Training: Partial (2) (1) NIH will have its own "Biographical Sketch Supplement" to include information specific to NIH not required by Common Forms (2) Training required for "Other Support / disclosure." Broader mandate rescinded NOT-OD-25-161
DOD	Mostly (some SciENcv)	Common Form: Sort of Yes*, DARPA = Yes MFTP Cert: Yes Research Security Training: No * DOD application instructions provide options for Biosketch/Other Support – can use Common Forms generated in SciENcv, or other format that has all the Common Forms elements
DOE	Yes	Common Form: Yes MFTP Cert: Yes Research Security Training: Yes
NASA	Yes	Common Form: Yes MFTP Cert: Yes Research Security Training: No
USDA	Yes	Common Form: Yes MFTP Cert: Yes Research Security Training: Yes

# Disclosure Requirements Across the Federal Agencies

# “Harmonization” & the Common Forms

- Common Forms are meant to standardize the content and formatting of Biosketch and Current & Pending (Other) Support documents across Federal agencies.
  - But are all agencies using Common Forms the same way?

# Other Support Defined

- Other Support: All resources made available to a researcher in support of and/or related to 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.

# Why?

- Assess scientific and budgetary overlap
- Evaluate effort commitments
- Identify foreign and domestic collaborations
- Ensure compliance with federal regulations
- Support risk-based analysis and oversight

# When and Who?

- Who: **Other Support must be submitted for all Key Personnel.** Key Personnel must devote measurable effort to the project regardless of whether they draw salary support from that project.
- Other Support is submitted:
  - DOE, DOD, NASA, NSF, DOD: At proposal stage
  - NIH: At JIT & RPPR (*if there are changes since the last reporting period*); certain applications require Other Support at proposal stage (e.g., F and T applications require OS for the Sponsor(s))

# Other Support Disclosures

Divided into 2 sections: “Project/Proposal” & “In-Kind”

*Project/Proposal includes\*:*

- Active and Pending Awards
- Grants/Cooperative Agreements/Contracts/Incoming Subawards
- Clinical Trial Agreements (CTAs) and Sponsored Research Agreements (SRAs)
- Internal Awards awarded through a competitive review process

\*List is not all inclusive

# Other Support Disclosures

## What about gifts?

Other Support **does not** include training awards, prizes, or gifts. However, please note that **gifts** are defined as “resources provided where there is no expectation of anything (e.g., time, services, specific research activities, money, etc.) in return.” An item or service given with the expectation of an associated time commitment is not a gift and is instead an in-kind contribution and must be reported as such.

# Other Support Disclosures

## Project/Proposal – Example:

**Title:** Chloride and Sodium Transport in Airway Epithelial Cells

**Major Goals:** The major goals of this project are to define the biochemistry of chloride and sodium transport in airway epithelial cells and clone the gene(s) involved in transport.

**Status of Support:** Active

**Project Number:** 2R01HL00000-13

**Name of PI:** Anderson, R.R.

**Source of Support:** NHLBI

**Primary Place of Performance:** Beckman Research Institute of the City of Hope

**Project/Proposal Start and End Date (MM/YYYY) (if available):** 3/1/2024 – 2/28/20249

**Total Award Amount (including Indirect Costs):** \$1,492,232

**Person Months per budget period:**

Year (YYYY)	Person Months
1. 2021	3.6 calendar
2. 2022	3.6 calendar
3. 2023	3.6 calendar
4. 2024	3.6 calendar

# Other Support Disclosures

*In-Kind Support includes\*:*

- **Resource support from external (foreign or domestic) organizations**, including office/laboratory space, equipment, supplies, personnel, etc.
- **Consulting engagements which involve research activities**
- **Resources that are high-value and not freely available**, such as certain animal models, cell lines, etc.
- **Support for Visiting Scholars**, etc. working in the PI's lab

\*List is not all inclusive

# Other Support Disclosures

## In-Kind – Examples:

### **Ex 1: External Support for Visiting Scholar**

**Summary of In-Kind Contribution:** Post-doctoral fellow, Dr. John Smith, who conducts research activities in the Anderson lab. Salary supported by Oxford University.

**Status of Support:** Active

**Primary Place of Performance:** University of California, Los Angeles

**Project/Proposal Start and End Date (MM/YYYY) (if available):**

**Person Months (Calendar/Academic/Summer) per budget period:** N/A

**Estimated Dollar Value of In-Kind Information:** \$80,000

# Other Support Disclosures

## In-Kind – Examples:

**Ex 2: Appointment at an External Institution with Resources Provided (e.g., lab space)**

**Summary of In-Kind Contribution:** Dr. Anderson has a Guest Lecturer appointment at Oxford University. Oxford University provides approximately 500 sq. ft. of lab space (two bays) where he conducts research when he is on campus.

**Status of Support:** Active

**Primary Place of Performance:** Oxford, England

**Project/Proposal Start and End Date (MM/YYYY) (if available):**

**Person Months (Calendar/Academic/Summer) per budget period:** N/A

**Estimated Dollar Value of In-Kind Information:** \$20,000

# Overlap

## Examples:

1. There is no scientific or budgetary overlap across these active and pending awards.
2. There is scientific overlap between aim 2 of NSF DCB 950000 and aim 4 of the application under consideration. If both are funded, the scope of work and budgets will be adjusted appropriately in conjunction with agency staff.

# Other Support Attestation

Key Personnel **must sign** the Other Support page, attesting to the completeness and accuracy of the report:

*“I, PD/PI or other senior/key personnel, certify that the statements herein are true, complete and accurate to the best of my knowledge, and accept the obligation to comply with Public Health Services terms and conditions if a grant is awarded as a result of this application. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties.”*

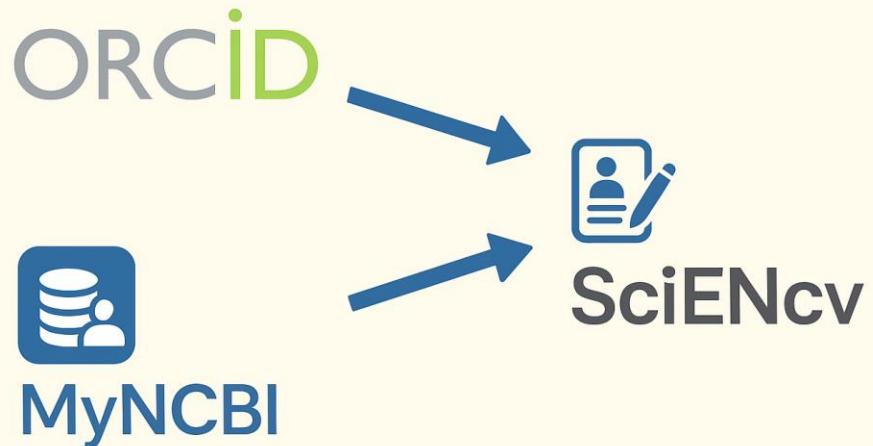
# Differences in the Actual Data Being Entered

Sponsor	Biosketch Differences	Current & Pending/Other Support Differences
NSF	Focus on professional preparation, appointments, and contributions; limited personal statement.	Person-months per year for each appointment; excludes foreign compensation unless it meets threshold; MFTRP certification included.
NIH	Includes Personal Statement, Contributions to Science, and Honors in separate supplement; emphasizes research contributions and relevant publications.	Must include all active/proposed support for all personnel; foreign appointments and other support with detailed commitments; includes MFTRP certification.
DoD/CDMRP	Includes standard Common Form data, but may add expanded sections for consulting, in-kind contributions, and specific DoD-specific reporting requirements.	Must disclose in-kind contributions, consulting arrangements, and any foreign support with dollar value thresholds; MFTRP certification included.
DOE	Similar to NSF in scope; may include additional fields for covered individuals.	Requires full disclosure of foreign support, in-kind contributions, and updates within 30 days; definitions of “covered individual” may differ.



# SciENcv Data Integration and Demonstration

# Data Flow and Persistent Identifiers



Only data that you have made public (or that you specifically authorize for sharing) is transferred. Nothing private moves automatically.

# ORCID to SciENcv

Category	Example Data Pulled from ORCID
Personal Identifiers	Name, ORCID iD, and affiliation(s)
Education	Degree, institution, field of study, dates
Employment	Current and past institutional positions
Works (Publications)	Journal articles, conference papers, books, datasets — including DOI, title, citation, etc.
Funding	Grants and awards listed in ORCID (with sponsor, title, role, amount if provided)
Professional Activities	Memberships, service, reviewing, invited talks, etc. (if entered in ORCID)

# Poll #3- How familiar are you with SciENcv? (Choose one)

1. I primarily train but do not work with PIs in creating documents
2. I am in a position where I review documents but do not access SciENcv
3. I work with PIs directly to help create and edit Current and Pending or Biographical Sketches
4. Other or None of the Above

# Live SciENcv Demo



**SciENcv: Science Experts Network Curriculum Vitae**

A researcher profile system for all individuals who apply for, receive or are associated with research investments from federal agencies. SciENcv is available in My NCBI.

## About SciENcv

[Background Information](#)

[Help Documentation](#)

## Resources

[XML Data Ingest](#)

[Data Documentation](#)

[Data Schemas](#)

## Log in



eRA Commons



National Science Foundation

[More Options](#)

# Best Practices for Administrators

# Preparing for Common Form Implementation/SciENcv

- **Outreach:** Proactively reach out to PIs who are submitting grants, progress reports, etc.
- **Email Communications:** Announce agency implementation timelines and available resources (templates, contacts)
- **Train the Trainer:** Administrators teach other administrators, who then work with faculty to prepare
- **Connect** beyond the Central Office: Department Research Administrators, Librarians, Administrative Assistants, etc. can all be great partners.
- **Centralize Resources:** Create and maintain a “disclosure hub” with up-to-date notices and resources

# QUESTIONS?

## APPENDIX

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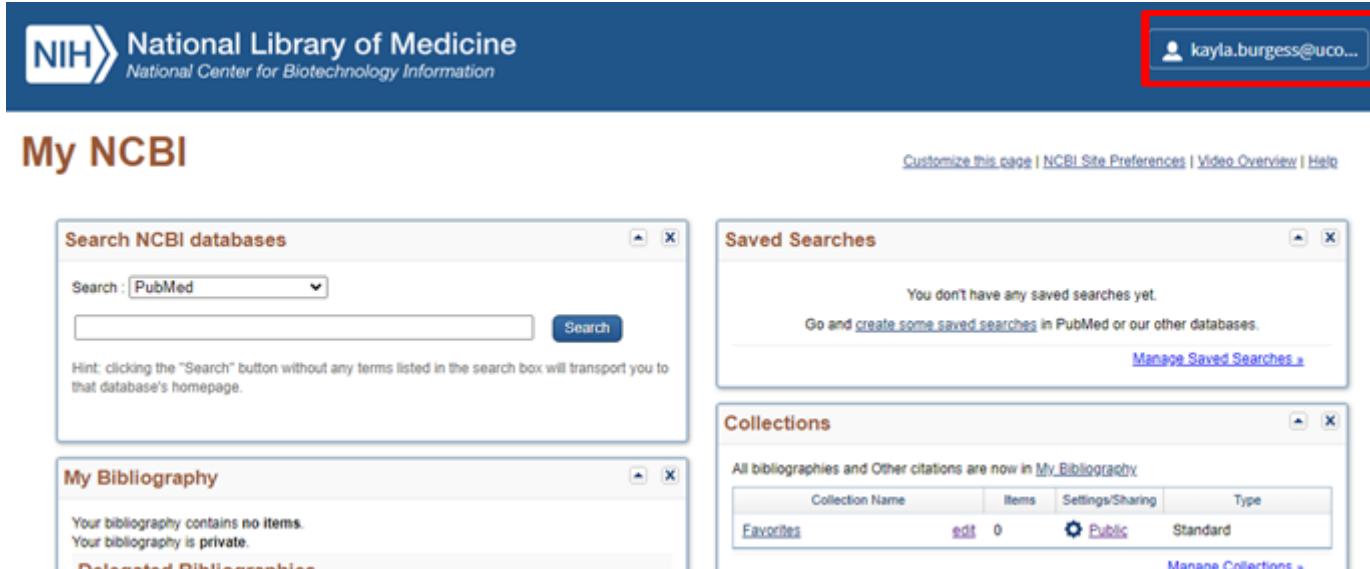
Step by Step Guide in SciENcv

# Registrations/Linkages

1. Register for an ORCID and/or update your ORCID Profile
2. Add Trusted Individuals to your ORCID account
3. Link your ORCID and eRA Commons accounts
4. Create Login.gov and link to eRA Commons
5. Create My NCBI account
6. Link ORCID to My NCBI
7. Add Delegates to My NCBI My Bibliography & SciENcv modules
8. Add publications to My Bibliography
9. Make My Bibliography link public
10. Create basic NIH Biosketch using SciENcv to pull in education/training/professional experience from ORCID profile

# Adding Delegates

PI can add Research Administrator as a delegate to make edits and create documents on their behalf



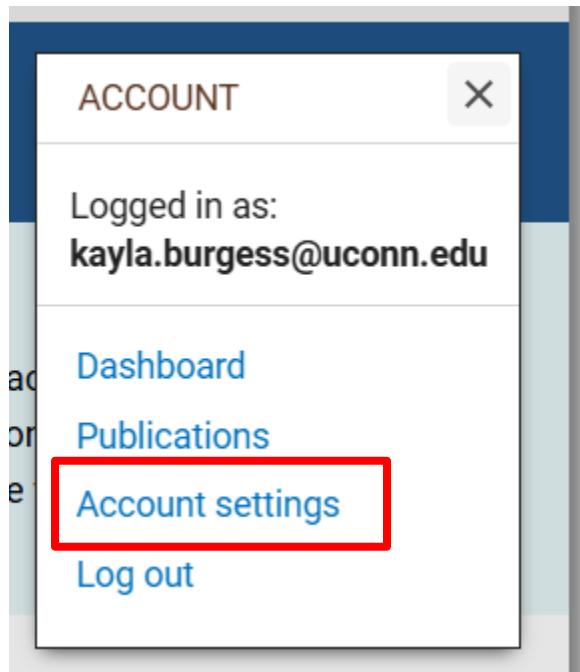
The screenshot shows the NCBI My NCBI interface. At the top, the NIH National Library of Medicine logo is displayed. To the right of the logo is a user profile box containing the email address "kayla.burgess@uco...". This profile box is highlighted with a red rectangle. Below the header, the text "My NCBI" is centered. To the right of "My NCBI" are links for "Customize this page", "NCBI Site Preferences", "Video Overview", and "Help". The main content area is divided into several workspace modules:

- Search NCBI databases**: A search interface for PubMed, with a dropdown menu set to "PubMed". It includes a search bar and a "Search" button. A hint message below the search bar states: "Hint: clicking the "Search" button without any terms listed in the search box will transport you to that database's homepage."
- Saved Searches**: A module stating "You don't have any saved searches yet." It includes a link "Go and create some saved searches in PubMed or our other databases." and a "Manage Saved Searches" button.
- Collections**: A module stating "All bibliographies and Other citations are now in [My Bibliography](#)". It shows a table of collections:

Collection Name	Items	Settings/Sharing	Type
Favorites	edit 0	Public	Standard

Below the table is a "Manage Collections" link.
- My Bibliography**: A module stating "Your bibliography contains no items. Your bibliography is private." It includes a "Delegated Bibliographies" link.

# Adding Delegates



Important: **\*\*PI must verify their email account before they can add a delegate\*\***

## NCBI Account Settings

### Email

This email is used for delivery of saved searches and recovery of password for your native NCBI account.

Email	Status	Edit
kayla.burgess@uconn.edu	(confirmed)	

# Confirm your delegation

**Subject:** RE: [MyNCBI] Delegation request from gsteed@era commons



[MyNCBI Dashboard](#) > [NCBI Account Settings](#) > Delegate Confirmation

## Confirm your delegation

My NCBI user gsteed@era commons has added you as a delegate. Please confirm whether or not you would like to accept this delegation.

Depending on the access you've been given, confirming delegation means you will be able to perform actions as if you were gsteed@era commons in their MyBibliography and/or SciENcv profiles.

[Confirm Delegation](#)

[Decline Delegation](#)

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**From:** [mynncbi@ncbi.nlm.nih.gov](mailto:mynncbi@ncbi.nlm.nih.gov) <[mynncbi@ncbi.nlm.nih.gov](mailto:mynncbi@ncbi.nlm.nih.gov)>  
**Sent:** Friday, August 13, 2024 7:51 AM  
**To:** Jaclyn Lucas <[jalucas@coh.org](mailto:jalucas@coh.org)>  
**Subject:** [MyNCBI] Delegation request from gsteed@era commons

Dear [jalucas@coh.org](mailto:jalucas@coh.org),

My NCBI is a free user account system that can be used to store data (such as PubMed citations), searches, and web site preferences for the NCBI web site.

The My NCBI user: gsteed@era commons has granted you permission to view and manage his/her bibliography. You will be able to add and remove citations to the bibliography and perform other functions as if you were gsteed@era commons. To accept this responsibility, click the link below to log in to or register for My NCBI.

<https://www.ncbi.nlm.nih.gov/account/delegation/?token=h7SAwouN750a48c8&delegateOf=gsteed%40era+commons>

If you believe you have received this message in error, you may simply ignore it or contact the requestor [garrett.steed@cuaanschultz.edu](mailto:garrett.steed@cuaanschultz.edu) for clarification.

Please do not reply to this message. Replies to this message are routed to an unmonitored mailbox. You may send questions, problems, and comments to [info@ncbi.nlm.nih.gov](mailto:info@ncbi.nlm.nih.gov).

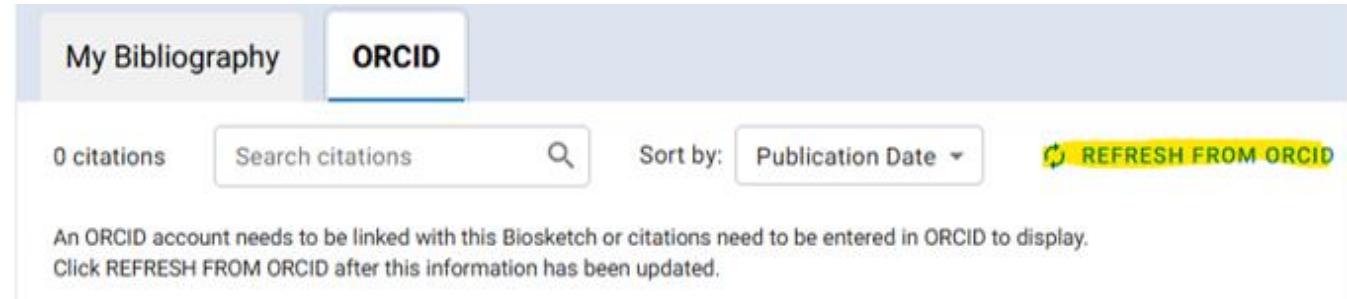
# Linking Publications From Other Sources

- Many faculty do not keep their publications solely on PubMed but are kept on other systems
  - Examples:
    - HEP Inspire; OSTI.gov (Department of Energy)

# Linking Publications From Other Sources

## Steps to link:

- Sign into your ORCID account (not through SciENcv)
- Click "Search and Link" to begin the wizard that will walk you through step by step. (See example in next slide)
- Once publications are imported to ORCID, refresh in SciENcv and publications list will be available



# Adding Delegates

## Delegates

You can add delegates to help you manage your bibliography and/or SciENcv profiles.

**Add delegate**

Note: If you are the delegate for another Research Administrator, you will be able to access all individuals in which they are also delegate.

### Add a Delegate

Enter the delegate's email address

What will happen:

- Your delegate will receive an e-mail notifying them of access.
- Your delegate will click a link in the e-mail to

-----

# Linking Publications From Other Sources Using Link Wizard

▼ Works (6)

Select all (6) Items currently selected (0)

Actions

- Search & link
- Add DOI
- Add PubMed ID
- Add BibTeX
- Add manually

Thor: Conceptual Model Of Persistent Identifier Linking

2016-03-31 | Report  
DOI: [10.5281/ZENODO.48705](https://doi.org/10.5281/ZENODO.48705)  
Funded by GRANT\_NUMBER: [H2020-EU.1.4.1.3](#)

Source: Sofia Maria Hernandez Garcia

# Linking When ORCID Linking Wizard is Unavailable –Example from iNSPIRE HEP (High Energy Physics)

The image shows a screenshot of the iNSPIRE HEP website. At the top, there is a navigation bar with links for Literature, Authors, Jobs, Seminars, Conferences, and More. A red arrow points to the 'Login' button. Below the navigation bar, there is a message: 'Please sign in to INSPIRE' and 'To suggest content to INSPIRE, an ORCID is required. Registration is free, quick, and open to all! Sign up at <https://orcid.org/register>'. A red box highlights the 'Login with ORCID' button, which is located next to a 'What is ORCID?' link. Another red arrow points to this button with the text '1) Click "Login", and then "Login with ORCID"'. To the right, a 'Settings' dialog box is open. It shows an 'Author Identifier: F.Castle.1' and a 'Research works (1)' section. A red box highlights the 'Export your INSPIRE works to ORCID' toggle switch. A red arrow points to this switch with the text '6) Enable the slider button to "Export your INSPIRE works to ORCID"'. The dialog box also contains the text: 'Your INSPIRE works are not exported to your ORCID yet. Please note that only the publications that are verified as yours on INSPIRE will be exported to ORCID.' and 'A new interface that will allow you to claim your papers is coming up soon. In the meantime, if you wish to claim a paper as yours, you can send your request at [authors@inspirehep.net](mailto:authors@inspirehep.net)'.

Source: <https://help.inspirehep.net/knowledge-base/export-your-inspire-works-to-orcid/>

# Current and Pending (Other) Support

## NSF Current and Pending (Other) Support

[VIEW DRAFT](#)[!\[\]\(4be02dac9417b9e8d32253d4bd08acc3\_img.jpg\) DOWNLOAD PDF](#)

These instructions serve as NSF's implementation of the Current and Pending (Other) Support Common Form developed by the National Science and Technology Council's Research Security Subcommittee.

[Read more ▾](#)

### Current and pending (other) support instructions

*Asterisks (\*) indicate required sections or fields.*

## Identifying Information, Organization and Location\* [EDIT](#)

In this section, disclose the information requested regarding the individual and their associated organization and location. All fields are required unless otherwise noted.

Title: My NSF Support 24-1

ORCID iD:

<https://orcid.org/0000-0003-2860-0668>

Name: NCBI User

Last updated:

February 22, 2023

Position Title: Researcher

My University

Someplace, Maryland, United States



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# Identifying Information, Organization, and Location

**Identifying Information, Organization and Location\*** 

In this section, disclose the information requested regarding the individual and their associated organization and location. All fields are required unless otherwise noted.

Title:	My NSF Support 24-1	ORCID ID:	<a href="https://orcid.org/0000-0003-2860-0668">https://orcid.org/0000-0003-2860-0668</a>
Name:	NCBI User	Last updated:	February 22, 2023
Position Title:	Researcher My University Someplace, Maryland, United States		

# Proposals/Active Projects

## Proposals/Active Projects\*

In this section, disclose ALL proposals and active projects in accordance with the definitions for [current and pending \(other\) support](#).

All fields are required unless otherwise noted.

The Status of Support types are defined as:

**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 (including this proposal) irrespective of whether such support is provided through the proposing organization or is provided directly to the individual.

[+ ADD PROPOSAL/ACTIVE PROJECT](#)

Proposal/Active Project Title	Source of Support	Status of Support	Total Award Amount	Support Start Date	Edit	Delete
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# Adding Proposal/Active Projects

**Proposal/Active Project**

*Asterisks (\*) indicate required fields.*

Proposal/Active Project Title \*

Status of Support \*

Current  Pending

Proposal/Active Award Number (if availa...)

Source of Support \*

Primary Place of Performance \*

Total Anticipated Proposal/Project Amo... i

Enter as USD. (Include Indirect Costs)

Proposal/Active Project Start Date \* mm/yyyy

Proposal/Active Project End Date \* mm/yyyy

# Editing a Proposal or Active Project

- Every activity can be edited or deleted.
- Any change will require recertification by the PI

## Proposals/Active Projects\*

In this section, disclose ALL proposals and active projects in accordance with the definitions for [current and pending \(other\) support](#).

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[+ ADD PROPOSAL/ACTIVE PROJECT](#)

Proposal/Active Project Title	Source of Support	Status of Support	Total Award Amount	Support Start Date	Edit	Delete
Opening Pathways, Engaging, and Networking in Biochemistry	My University	Pending	\$60,000	Aug 2024	 	

# Certification

To request certification from a PI after making edits, click on "Download PDF"

## Certification

[VIEW DRAFT](#)

[DOWNLOAD PDF](#)

Each senior/key person is required to complete the following certifications regarding the information provided in their Current and Pending (Other) Support:

I certify that the information provided is current, accurate, and complete. This includes but is not limited to current, pending, and other support (both foreign and domestic) as defined in 42 U.S.C. § 6605.

I also certify that, at the time of submission, I am not a party to a [malign foreign talent recruitment program](#).

Misrepresentations and/or omissions may be subject to prosecution and liability pursuant to, but not limited to, 18 U.S.C. §§ 287, 1001, 1031 and 31 U.S.C. §§ 3729-3733 and 3802.

# Requesting Certification

 **Certification Required**

The PI/co-PI or Other Senior/Key Person must certify this document in order for you to generate a PDF.

Each PI/co-PI or Other Senior/Key Person must electronically [certify](#) their Biographical Sketch and Current and Pending (Other) Support documents prior to submission. Delegates are not able to perform this step, but may download documents once they are certified.

You can send an email to the Senior/Key Person ([savannah.rivera@uconn.edu](mailto:savannah.rivera@uconn.edu)) asking them to certify this document by selecting "Send Notification" below.

[CANCEL](#) [SEND NOTIFICATION](#)

# Certification

Message that a PI will receive before certifying

**Certification**

I certify that the information provided is current, accurate, and complete. This includes but is not limited to current, pending, and other support (both foreign and domestic) as defined in 42 U.S.C. § 6605.

I also certify that, at the time of submission, I am not a party to a [malign foreign talent recruitment program](#).

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**CANCEL** **CERTIFY**

# CASE STUDIES

# Case Study: The Visiting Scholar

## **Scenario:**

Dr. Lin, a PI on an NIH-funded project, is hosting a visiting scholar from her alma mater in China for six months. The visitor works on similar topics, has access to the lab, and contributes to data analysis, but is not paid by the grant or the university.

## **Discussion Questions:**

- Should the visiting scholar's contribution be disclosed on Dr. Lin's Other Support?
- Does it matter that the scholar is not paid or listed as a key person?
- What are the potential compliance and security risks if not disclosed?

# Case Study: The Dual Appointment

## **Scenario:**

Dr. Patel, a U.S. faculty member, accepts a short-term, part-time faculty position at a university abroad. He receives a modest stipend and lab space overseas but continues to perform NIH-funded research at his U.S. home institution.

## **Discussion Questions:**

- What elements must be disclosed on Dr. Patel's Other Support?
- How should institutional officials verify if this arrangement is compliant with university and sponsor policy?
- What are the potential red flags?

# Case Study: The Industry Collaboration

## Scenario:

Dr. Nguyen receives an “unrestricted gift” from a biotech company to support her graduate student’s research. The funds are deposited into a discretionary account and used to buy supplies related to her NIH-funded work.

## Discussion Questions:

- Is this relationship and funding considered Other Support?
- Should the company’s gift be disclosed even if it is not a sponsored project?
- How can administrators help PIs distinguish between *gifts* and *sponsored support*?

# Case Study: The Start-up Spin Off

## **Scenario:**

Dr. Jackson develops technology under an NSF award and forms a small start-up company to commercialize it. He holds equity and receives consulting income from the start-up, which later applies for its own SBIR award.

## **Discussion Questions:**

- Which aspects of this relationship must be disclosed?
- How does this overlap with Conflict of Interest and Outside Activity reporting?
- How can administrators help manage these dual roles to avoid compliance issues?