This message concerns important changes to disclosures on proposals to and awards from federal agencies. It also summarizes other important issues arising from U.S. [National Security Presidential Memorandum (NSPM)-33](#).

Dear Principal Investigators, other faculty and staff involved with sponsored projects:

Members of the UConn sponsored research community are already aware of ever-increasing calls by federal agencies for disclosure of all resources made available in support of and/or related to all research endeavors. These disclosures are generally referred to as "Current and Pending Support" (National Science Foundation [NSF]), "Other Support" (National Institutes of Health [NIH]), or "Active and Pending Support" documents. We would like to remind UConn researchers of the need to be transparent regarding their other research support, other research activities, and research collaborations when submitting grant proposals. Required disclosures include any financial support for research, all "in-kind" research support (support for visiting researchers, space, and equipment), and "high-value" research materials, as well as consulting contracts and agreements that include the conduct of research – even if no remuneration, financial or in-kind support is provided, and even when the research activity has only been proposed for the future and is not currently underway (that is, pending). Federally mandated disclosures apply to both foreign and domestic entities, and some sponsors have issued further guidance relating to research and appointments specific to foreign collaborations (such as NIH's requirement that associated documents be provided in English).

Research support may derive from entities or collaborators outside of UConn. Therefore, the ultimate responsibility for ensuring accuracy on any active and pending support documents belongs to the personnel who are listed on proposal documents, and who have signed the UConn [Internal Proposal Review (IPR) Form](#) (along with any other support documents requiring certification) indicating that "all sources of support, including other support outside of the University [have] been disclosed in the application." Failure to make or update required disclosures may trigger a variety of penalties (individual and institutional), as well as repercussions on research, including terminated/suspended grants, return of research funds, and exclusion of personnel from research activities.

U.S. [National Security Presidential Memorandum (NSPM)-33](#), issued on January 14, 2021 by the Trump Administration and subsequently endorsed by the Biden Administration, requires ALL federal research funding agencies to strengthen and standardize disclosure requirements for federally funded awards. Disclosure requirements (WHO is required to disclose WHAT) will be standardized across agencies, as will disclosure forms and formats; digital persistent identifiers (such as ORCIDs) will be used to track disclosures; and institutions will be required to update ALL disclosure documents (e.g. Current and Pending, Other Support) prior to an award of support. NSF has been designated the steward of common disclosure forms and disclosure requirements and has issued draft [NSPM-33 Implementation Guidance](#). The eventual Guidance, to be adopted across federal agencies to the extent possible consistent with the mission of each agency, includes a [table indicating disclosure requirements by senior personnel](#) across common proposal documents: Biographical Sketch, Current & Pending/Other Support, Collaborators & Other Affiliations, and Facilities & Resources.

Based on NSPM-33 and other federal directives, NSF and NIH have been working toward "harmonizing" disclosure requirements for proposal documents. Following NIH's current (January 2022) requirement for personnel certification/signature of Other Support, the research community can expect a number of upcoming changes to submission guidance. Upcoming NSF changes, made public in [the 23-1 version of the Proposal and Award Policies and Procedures Guide effective in January 2023](#), and communicated to the UConn research administrators via the SPS UCRESADM-L listserv on 12/14/2023, include required PI and institutional signature/certification of all NSF [Biosketch](#) and [Current and Pending Support](#) documents (via SciencCV or fillable PDF template) beginning January 2023, and NSF-mandated use of SciencCV effective October 2023 (originally planned for January 2023).

Please visit the newly updated UConn SPS [Active and Pending Support page](#) for additional federal-sponsor-specific guidance, or direct specific questions to Tracy Bourassa (tracy.bourassa@uconn.edu) for Storrs and regional campuses, or Paul Hudobenko (hudobenko@uchc.edu) for UConn Health.

With regards,

Pamir Alpay, Ph.D.   Michael Glasgow, Jr.

Interim Vice President, Research, Innovation and Entrepreneurship   Associate Vice President, Sponsored Program Services