

**NSPM-33  
Implementation  
Guidance Disclosure  
Requirements &  
Standardization Forms**

**October 20, 2022**

**PANELISTS:**

**Jean Feldman**, National Science  
Foundation

**Michelle Bulls**, National Institutes of  
Health



# Common Disclosure Form Update

**COGR Meeting**  
**October 20, 2022**

# Topics

- Update on NSTC Research Security Subcommittee, Disclosure Requirements & Standardization Efforts (Jean Feldman & Michelle Bulls)
- NSF Implementation of NSPM-33 Guidance (Jean Feldman)
- NIH Implementation of NSPM-33 Guidance (Michelle Bulls)

# NSTC Research Security Subcommittee

## Disclosure Requirements & Standardization

- Over the past several months, the Research Security Subcommittee has worked to develop consistent disclosure requirements for use by senior personnel, as well as to develop proposed common disclosure forms for the Biographical Sketch and Current and Pending (Other) Support sections of an application for Federal research and development (R&D) grants or cooperative agreements.
- The objective of the *Disclosure Requirements and Standardization* section of NSPM-33 Implementation Guidance is to, "Provide clarity regarding disclosure requirements (e.g., who discloses what, relevant limitations and exclusions), disclosure process (e.g., updates, corrections, certification, and provision of supporting documentation), and expected degree of cross-agency uniformity".
- NIH, NSF, and OSTP co-chair the Disclosure Working Group (Michelle Bulls, Jean Feldman, and Ryan Donahue)
- Prior to posting in the Federal Register, the co-chairs and NSTC leadership resolved over 250 comments from the Federal Research Funding Agencies and other agencies represented on the Research Security Subcommittee.
- A notice for comment was published in the Federal on August 31, 2022:
  - <https://www.govinfo.gov/content/pkg/FR-2022-08-31/pdf/2022-18746.pdf>



# NSTC Research Security Subcommittee Disclosure Requirements & Standardization (Cont'd)

- "For Comment" Documents:
  - A common Biographical Sketch form, including data elements and associated instructions;
  - A common Current and Pending (Other) Support form, including data elements and associated instructions; and
  - An excel spreadsheet that summarizes all the data elements, as well as their data attributes.
  - Comments are due by October 31, 2022.
- The National Science Foundation (NSF) has agreed to serve as steward for these common forms. A new webpage has been developed for this purpose:
  - [https://www.nsf.gov/bfa/dias/policy/nstc\\_disclosure.jsp](https://www.nsf.gov/bfa/dias/policy/nstc_disclosure.jsp).
- The webpage also contains an updated table entitled, *NSPM-33 Implementation Guidance Pre- and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending (Other) Support*. This table has been created to provide helpful reference information regarding pre-award and post-award disclosures.
  - This table supersedes in its entirety, Table 2a and Paragraph 7 of the Disclosure Requirements and Standardization Section of the NSPM-33 Implementation Guidance.



# NSF Implementation of NSPM-33 Implementation Guidance: PAPPG (NSF 23-1) Proposed Revisions to the Biographical Sketch

- The NSF version will be as close as possible to the common form for the Biographical Sketch that was published in the Federal Register for public comment.
- Given the variance in timing between final issuance of the common form and the implementation of the PAPPG in January 2023, however, variances may occur.
  - NSF will work to address any variances in the next issuance of the PAPPG
- Will include requisite certification from NDAA 2021, Section 223, regarding information being accurate, current and complete, that must be included from each individual identified as senior personnel.
- Persistent Identifier: NSF plans to specify ORCID as the persistent identifier and encourages senior personnel to use ORCID to help with pre-population and reduction in administrative burden. Use of ORCID is optional.
- Use of SciENcv to create the biographical sketch becomes mandatory on October 23, 2023.



National Institutes  
of Health

# NSF Implementation of NSPM-33 Implementation Guidance: PAPPG (NSF 23-1) Proposed Revisions to Current and Pending (Other) Support (CPS)

- The NSF version will be as close as possible to the CPS common form that was published in the Federal Register for public comment.
- Given the variance in timing between final issuance of the common form and the implementation of the PAPPG in January 2023, however, variances may occur.
  - NSF will work to address any variances in the next issuance of the PAPPG.
- Will include requisite certification from NDAA 2021, Section 223, regarding information being accurate, current and complete, that must be included from each individual identified as senior personnel.
- Persistent Identifier: NSF plans to specify ORCID as the persistent identifier and encourages senior personnel to use ORCID to help with pre-population and reduction in administrative burden. Use of ORCID is optional.
- Use of SciENCv to create current and pending support becomes mandatory on October 23, 2023.



National Institutes  
of Health

# NSF Implementation of NSPM-33 Guidance: Other PAPPG Changes

- New Certification Requirements for both the organization and senior personnel to implement NDAA 2023, Section 223.
- New sections added to the PAPPG:
  - Disclosure Policies;
  - Research Security; and
  - Scientific Integrity.
- Slight modifications made to NSF's Conflict-of-Interest Policy.
- Responsible and Ethical Conduct of Research coverage modified for compliance with Chips and Science.



National Institutes  
of Health



# NSF Implementation of NSPM-33 Guidance: Disclosures from Senior Personnel

- NSF Pre- and Post-award Requirements for Disclosures and Update/Correction of Disclosures are as follows:
  - At the time of proposal submission: Collaborators and Other Affiliations, Biographical Sketch and Current and Pending Support.
  - Prior to making a funding recommendation: Updated Current and Pending Support information must be submitted.
    - Proposers being considered for funding will be required, if requested by the cognizant NSF Program Officer, to submit updated CPS documents prior to making a funding recommendation.
    - If there are no changes from that originally submitted in the CPS, the individual would resubmit with a new timestamp.
    - Funding recommendations cannot be completed until CPS has been updated for all senior personnel.
  - After an award is made: if the AOR discovers that a disclosure that should have been submitted at the time of proposal submission, but was not, they have 30 days to submit a post-award request to NSF.



National Institutes  
of Health

# NSF Implementation of NSPM-33 Guidance: Disclosures from Senior Personnel (Cont'd)

- At the time of project reporting: PIs and co-PIs must specify whether new, active other support has been received in their annual and final project reports. If yes, they must attach updated Current and Pending Support information.
- NSF is continuing to assess possible use of a just-in-time solution for current and pending support for a future iteration of the PAPPG.



National Institutes  
of Health

# Questions

- Email: [policy@nsf.gov](mailto:policy@nsf.gov)
- Visit the Policy Office website: <https://www.nsf.gov/bfa/dias/policy/>
- Visit the Policy Office outreach website:  
<https://www.nsf.gov/bfa/dias/policy/outreach.jsp>



National Institutes  
of Health

# NIH Implementation Grants Policy Statement

- In FY23 version NIH will create new section in GPS specific to disclosure requirements.
- This section will reference all required disclosures:
  - Other Support (NIH GPS 2.5.1)
  - Biosketch (NIH GPS 2.3.7.12)
  - Financial Conflicts of Interest
- Will link out to the [NIH Disclosures Table](#)
- GPS will be released for public comment later this fall.

# NIH Implementation - Biosketch Form/Instructions

- OMB approval currently in progress:
  - Include *optional* Persistent Identifier (For NIH: ORCID ID)
  - Add electronic signature requirement to align with Other Support
  - Add updated certification language
- Additional updates planned, immediately post current clearance:
  - Align NIH forms with the common form, with some agency-specific instructions.
  - NIH anticipates making the new forms available in January 2023.
- NIH-specific areas for future guidance:
  - Page limit
  - Personal Statement
  - Changes to 'Contributions to Science'
  - Hyperlink policy



National Institutes  
of Health

# NIH Implementation - Other Support Form/Instructions

- OMB approval currently in progress:
  - Include *optional* Persistent Identifier (For NIH: ORCID ID)
  - Updated certification language
- Additional updates planned, immediately post current clearance:
  - Align NIH forms with the common form, with some agency-specific instructions.
  - NIH anticipates making the new forms available in January 2023.
- NIH-specific areas for further guidance:
  - Requirements for Other Significant Contributors
  - Methods for submitting supporting documentation, e.g. integration with SciENcv



National Institutes  
of Health

# NIH Implementation - SciENcv Templates

- NIH anticipates adopting the Interagency forms with some agency-specific instructions available in January 2023.
- Electronic versions of the new forms are anticipated to be made available in SciENcv in early FY 2024 (October 2023. Goal to align NSF's and NIH's implementation).
- Electronic signature/certification will be captured via SciENcv.
- NIH is exploring options for how best to include supporting documentation in SciENcv generated Other Support document.



National Institutes  
of Health

# Got Questions about NIH?

- Contact OPERA at our central mailbox for disclosure questions:
  - [nihosbiosketch@nih.gov](mailto:nihosbiosketch@nih.gov)
- Visit our OER Websites for policies, forms, and FAQs
  - [Other Support](#)
  - [Biosketch](#)



National Institutes  
of Health