

UWM DISCLOSURE OF OTHER SUPPORT POLICY

No: <u>14-10</u>

Authority: National Security Presidential Memorandum 33 (NSPM-33)

Date: April 2025

Initiator: Vice Provost for Research, Office of Research

Responsible Party: Vice Provost for Research, Office of Research

I. Purpose

This policy is issued to comply with federal requirements concerning disclosure of current/pending other support documents.

II. Policy

UWM requires that all researchers who engage in sponsored projects comply with federal law, university policies, and sponsoring agency requirements regarding the disclosure of information through biographical sketches, and current/pending other support documents.

Per the National Security Presidential Memorandum 33 (NSPM-33), Principal Investigators (PIs) and other senior/key personnel seeking or receiving federal research and development funding must disclose to federal funding agencies:

•Other support, contractual or otherwise, direct and indirect, including current and pending private and public sources of funding or income, both foreign and domestic. For researchers, other support includes all resources made available to a researcher in support of and/or related to all of their professional research efforts, including resources provided directly to the individual rather than through the research institution, and regardless of whether or not they have monetary value (e.g., even if the support received is only in-kind, such as office/laboratory space, equipment, supplies, or employees). This includes resources and/or financial support from all foreign and domestic entities, including but not limited to, gifts provided with terms or conditions, financial support for laboratory personnel, and participation of student and visiting researchers supported by other sources of funding.

•*Current or pending participation in, or applications to, programs sponsored by foreign governments, instrumentalities, or entities, including foreign government-sponsored talent recruitment programs.*

•Organizational affiliations, employment, positions, and appointments, both domestic and foreign, including affiliations with foreign entities or governments. This includes titled academic, professional, or institutional appointments whether or not remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary). The requirement for disclosure applies 1) at the time of proposal submission, 2) prior to the award of support, 3) as part of annual progress reports, 4) upon significant changes in circumstances that warrant disclosure, 5) upon addition of new senior/key personnel to a research team, and 6) at any subsequent time the agency determines appropriate during the term of the award.

UWM requires that every disclosure to an external funding agency be current, accurate, and complete to the best of the individual's knowledge.

False, fictitious, or fraudulent statements or claims (including intentional omissions) in violation of this policy may result in university and sponsor administrative, civil, or criminal penalties.

III. Contact Information

Questions, including those regarding the interpretation of this policy, may be directed to the Office of Research.

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Appendix A

Referenced and Related Documents

National Security Presidential Memorandum 33 (NSPM-33)

OSTP's National Security Presidential Memorandum-33 Implementation Guidance

National Science and Technology Council Pre- and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending (Other) Support

Disclosure of Funding Sources in Applications for Federal Research and Development Awards (24 USC 6605 SEC. 223)