Date: June 4, 2024
To: All PI, Co-PI, Senior and Key Personnel on NSF Awards
From: John H. Shaw
Subject: Updates on NSF Disclosure Requirements

The following provides a summary of the disclosure requirements for NSF proposals and awards, including several changes that became effective May 20, 2024. As a reminder, the following is a non-exhaustive list of key elements of the NSF disclosure requirements. For detailed information please visit the NSF Guidance on the Vice Provost for Research Website, which has been updated to reflect changes in the NSF Proposals & Awards Policies & Procedures Guide (PAPPG).

Please carefully review the NSF Guidance and PAPPG and contact your School’s research administration office with any questions.

**Biographical Sketch**

- Must be created in SciEnev
- Required for each individual identified as a senior/key person.
- Page limitation has been removed from the biographical sketch (previous 3-page limit).
- Synergistic Activities removed as an element of the Biosketches. Synergistic Activities are now a separate upload for each senior/key person in Research.gov. Each senior/key person must provide one-page document listing up to five distinct synergistic activities that demonstrate the broader impact of the individual’s professional and scholarly activities that focus on the integration and transfer of knowledge as well as its creation.
- Individuals are required to disclose contracts associated with participation in programs sponsored by “foreign governments, instrumentalities, or entities, including foreign government-sponsored talent recruitment programs”. Further, if an individual receives direct or indirect support that is funded by a foreign government-sponsored talent recruitment program, even where the support is provided through an intermediary and does not require membership in the foreign government-sponsored talent recruitment program, that support must be disclosed. Senior personnel must also report other foreign government sponsored or affiliated activity.
- New certification added on Malign Foreign Talent Recruitment Programs (these changes also apply to Current and Pending (Other) Support).
- Parameters have been added regarding professional appointments: “With regard to professional appointments, senior/key persons must only identify all current domestic and foreign professional appointments outside of their primary organization.”
- Guidance revised regarding listing of products: “The listing of products provided should be organized by the senior/key person in a way that best demonstrates their ability to carry out the research proposed.”
**Current and Pending (Other Support)**

- Current and pending (other) support information must be provided separately for each individual designated as a senior/key person through use of SciENcv.
- Required for each individual identified as a senior/key person.
- Implements new Common Disclosure form.
- Must certify that they are not a party to a Malign Foreign Talent Recruitment Program. (This “per proposal” certification is in addition to the Harvard-wide certification, currently ongoing, for all individuals to disclose any MFTRPs.)
- Individuals are required to disclose contracts associated with participation in programs sponsored by foreign governments, instrumentalities, or entities, including foreign government-sponsored talent recruitment programs. Further, if an individual receives direct or indirect support that is funded by a foreign government-sponsored talent recruitment program, even where the support is provided through an intermediary and does not require membership in the foreign government-sponsored talent recruitment program, that support must be disclosed. Senior personnel must also report other foreign government sponsored or affiliated activity.
- Revised definition of In-kind contribution provided, requiring the disclosure of all in-kind contributions with an estimated dollar value of $5000 or more and that require a commitment of the individual’s time.
  - An in-kind contribution is a non-cash contribution provided by an external entity that directly supports the individuals’ research and development efforts. An in-kind contribution may include but is not limited to real property; laboratory space; equipment; data or data sets; supplies; other expendable property; goods and services; employees or student resources. In-kind contributions with an estimated value of less than $5000 need not be reported.
- Consulting activities must be disclosed under the proposals and active projects section of the Common Form when any of the following scenarios apply:
  - The consulting activity will require the senior/key person to perform research as part of the consulting activity.
  - The consulting activity does not involve performing research, but is related to the senior/key person’s research portfolio and may have the ability to impact funding, alter time or effort commitments, or otherwise impact scientific integrity; and
  - The consulting entity has provided a contract that requires the senior/key person to conceal or withhold confidential financial or other ties between the senior/key person and the entity, irrespective of the duration of the engagement.

**Note:** The definition of “perform research” does not normally include service on scientific or clinical advisory boards or more general scientific consulting unless it is anticipated that the individual will make a direct and significant intellectual contribution to a specific research project for the entity.

In addition to the **summary of the NSF disclosure related requirements** changes reflected above, below are additional NSF required changes as of 5/20/2024:

- Annual reporting, at the university-wide level, of all “current financial support, the value of which is $50,000 or more, including gifts and contracts, received directly or indirectly from a foreign source”
which is “associated with a foreign country of concern (People's Republic of China, the Democratic People's Republic of Korea, the Russian Federation, the Islamic Republic of Iran)”.

- **Tribal Nations** Specific Requirements: NSF proposals that may impact the resources or interests of a federally recognized Tribal Nation will not be awarded by NSF without prior written approval from the official(s) designated by the relevant Tribal Nation(s).

- **International Activities**: The section has been updated to clarify the information required from proposers to justify the request to provide funding through the NSF budget of a foreign organization or foreign individual (through a subaward or consultant arrangement).

- **Mentoring Plan**: Expansion of the section for mentoring plan for postdoctoral researchers or graduate students supported on the project. The one-page limitation for the Mentoring Plan remains.

- **Individual Development Plans** for Postdoctoral Scholars or Graduate Students, requires that an individual development plan has been developed for each postdoctoral scholar and graduate student who would be receiving substantial support from an NSF award. NSF defines “substantial support” as an individual that has received one person month or more of support during the annual reporting period under the NSF award.

- **Use of generative AI in proposal preparation**: Proposers are encouraged to indicate in the project description the extent to which, if any, generative AI technology was used and how it was used to develop their proposal.

*Note: After an award has been made, a change in active other support must be reported to NSF as part of the annual or final annual project report submission. Please make sure that any changes including those in the active other support of the PD/PI(s) or senior/key personnel since the last reporting period have been included in the RPPR.*