

UNIVERSITY AND ADMINISTRATIVE POLICY

Policy Title:	Other Support Disclosure Policy for Siena Researchers
Responsible Executive:	Provost and Senior Vice President
Responsible Office:	Office of Grants and Sponsored Research
Owner Contact:	Director of Grants and Sponsored Research, sponsoredresearch@siena.edu, 783-2322
Reviewed By:	Dr. Margaret Madden, Provost and Senior Vice President
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Brief Overview of the Policy

Submitted as part of a federal proposal application, progress report or through a Just-In-Time (JIT) request, senior/key personnel must complete an 'Other Support Disclosure' form that includes all domestic and foreign support, regardless of monetary value or institutional affiliation.

Reason for Policy

The University has the responsibility to make sure researchers understand their requirement to disclose all resources made available in support of and/or related to their research endeavors. The disclosure ensures that federal agencies have a complete picture of all research resources supporting a senior/key personnel's research activities, regardless of whether the support is domestic or foreign, or has a direct monetary value.

Scope of the Policy: Entities or Individuals affected by this policy:

- *Faculty that are designated as senior/key personnel on proposals or awards from federal agencies that require Other Support disclosures*

The Official Policy

Proposal applicants and awardees are to disclose when requested on an Other Support form (the format will vary depending on the agency) “all resources made available to them as a researcher in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are based at Siena.”

As requested by the federal sponsor senior/key personnel are responsible for updating their disclosures during the life of the grant/project if new support is received or previously undisclosed support is identified (e.g. progress reports).

What must be disclosed

- Financial and in-kind support: Includes financial support for personnel, high-value materials, and any in-kind contributions like office or lab space, equipment, or supplies from any source.
- Personnel and affiliation: Any resources or financial support from foreign or domestic entities for research activities.
- Consulting agreements: When research is conducted as part of the consulting activity and falls outside the scope of the individual's appointment at the primary institution.
- Support from other institutions: Includes startup packages, resources, and contributions from organizations other than Siena.
- Contracts, grants, and other agreements: All agreements specific to appointments, affiliations, and/or employment with another institution or entity outside the U.S.

Failure to disclose is considered a violation of the terms and conditions of federal awards and can be a serious form of research misconduct. Consequences include loss of funding, administrative actions, retraction of publications to name a few.

Other Support information is not needed for:

- Program Directors, training faculty, and other individuals involved in the oversight of training grants
- Individuals categorized as Other Significant Contributors
- Consultants, in progress reports when there has been a change in active other support, **except**
 - Program Directors, training faculty, and other individuals involved in the oversight of training grants

Training

Can be found in Canvas called: *Research Security Training*, please contact researchcompliance@siena.edu if you need access to this course. Also required is training on NIH Grants Policy Statement – [Just in Time Procedures](#).

Definitions

Other Support: all resources made available to a researcher in support of and/or related to all of their research endeavors, regardless of whether they are awarded through the applicant institution, directly to the individual, or provided in-kind (e.g., office/laboratory space, equipment, supplies, or employees). This includes both domestic and foreign support.

In-Kind Contributions: Non-monetary resources provided to a researcher that support their research activities. Examples include access to equipment, lab space, personnel, or materials. These must be reported even if they are not used on the federal project.

Active Support: Funding or resources currently available to the researcher, including ongoing awards, contracts, or in-kind contributions.

Pending Support: Proposals or applications that have been submitted and are awaiting funding decisions. These must be disclosed to ensure transparency of potential overlaps or conflicts.

Overlapping Support: When two or more sources of support fund the same or closely related research activities. Overlap can be scientific, budgetary, or commitment-related and must be disclosed and resolved.

Effort Commitment: The proportion of time a researcher devotes to a specific project or activity, typically expressed as a percentage of total professional effort.

Foreign Component: The performance of any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, whether or not federal funds are expended.

Consulting Activities: External engagements where a researcher provides professional advice or services. If related to the researcher's institutional responsibilities or research expertise, these may need to be disclosed as part of Other Support.

NIH: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-133.html>

[Section 2.5.1 "Just-in-Time Procedures"](#)

Resources

- Updated [Other Support resources](#), including FAQs and sample other support formats
- [NSF Current and Pending Support Guidelines](#)
- Office of Sponsored Research and Grant Compliance [website](#)
- External Grants Handbook

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