

ORSO Guideline 34

Disclosing “Other Support” / “Current and Pending Support”

WASHINGTON STATE UNIVERSITY

Office of Research Support and Operations

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Background

Washington State University (WSU) is committed to ensuring that individuals carrying out sponsored project activities are aware of and compliant with their obligations to disclose information on other current and pending support.

The obligation to disclose such other current and pending support has long existed in order to receive funding from certain Federal agencies. Seeking to codify and extend such requirements to all Federal agencies that provide funding, [Section 223](#) of the 2021 National Defense Authorization Act directs Federal agencies to require each covered individual to (at a minimum):

1. Disclose the amount, type, and source of all current and pending research support received by, or expected to be received by, the individual as of the time of the disclosure;
2. Certify the disclosure is current, accurate and complete; and
3. Agree to update such disclosure at the request of the agency prior to the award of support and at any subsequent time the agency determines appropriate during the term of the award.

Further, each entity (including WSU) applying for Federal funding must certify that each covered individual employee has been made aware of these requirements. This occurs at WSU when Principal Investigators (PI) approve eREX Forms and the PI Certifications that go along with them, which include:

“Any sponsor current and pending support and/or disclosure related forms/reports are complete and accurate. I will update current and pending support and/or disclosure related forms/reports for all affected personnel as required by sponsors and/or the University. This request does not duplicate requests for the same work, and all consulting and extended professional activities have been disclosed as required by the Faculty Manual.”

How NSF & NIH Have Implemented Section 223

The [National Science Foundation](#) (NSF) requires the disclosure of “Current and Pending Support” from all individuals designated as senior personnel in the proposal. The “Current and Pending Support” information provided by the senior personnel is used to assess the capacity of the senior personnel to carry out the project, as well as to assess whether there are any potential overlap or duplication issues with the project being funded. In order to understand all of the requirements surrounding “Current and

Pending Support” when applying for NSF funding, please review the most current version of the [Proposals and Award Policies and Procedures Guide](#) (PAPPG) published by NSF.

The [National Institute of Health](#) (NIH) requires the disclosure of “Other Support” from senior/key personnel listed on an application for funding. The “Other Support” information is required by NIH as part of the Just-in-Time (JIT) and Research Performance Progress Report (RPPR) to ensure there is no scientific, budgetary, or commitment overlap with the proposed project. [NOT-OD-21-169](#), NIH also requires supporting documentation from all senior/key personnel who receive certain “Other Support” from a foreign institution or for foreign activities and resources, to include translated copies where the originals are not in English. Affected personnel must be prepared to provide the required documentation when requested as part of a JIT/RPPR. If affected personnel on an active NIH grant failed to disclose “Other Support” as part of a JIT/RPPR, they must immediately notify ORSO and provide all necessary documentation. In order to understand all of the requirements surrounding the disclosure of “Other Support” when applying for NIH funding, please review the [most recent guidance](#) NIH has published on the subject.

Other Federal Agencies

When applying for Federal funding, please work with your departmental research administrator to identify the agency-specific guidance on other current and pending support published by that funding agency. If you are unable to identify the appropriate guidance, please contact the [Office of Research Support and Operations](#) for assistance.