

This matrix is designed to provide general guidance on the expectations of key federal agencies for biosketches and the disclosure of current and pending/other support. This matrix is not intended to be exhaustive, but instead to provide faculty and staff with information regarding the evolving requirements addressing concerns about “foreign influence.” At the end, there is a summary describing the differences between the eCD process and biosketches/other support.

Northeastern affirms its commitment to and support of faculty and staff growing our community and advancing knowledge through international collaboration and engagement, while at the same time urging transparency in disclosures.

Version dated August 2020

Agency	Requirements		References
National Institutes of Health (NIH)	When:	<ul style="list-style-type: none"> • At the time of proposal • Just in Time (“JIT”) • As needed prior to the award release • Update annually via the annual progress reports (RPPRs) 	<p>NIH Disclosure Table</p> <p>Information on Implementation of Changes</p> <p>NIH Other Support FAQs</p> <p>Guidance, FAQs and NOT-OD-19-114</p> <p>Also subject to fCOI disclosure requirements: 42 CFR 50, Subpart F</p>
	Biosketch:	<ul style="list-style-type: none"> • Current and past appointments • Honors and awards, including talent grants • Honorary appointments (including unpaid) • All foreign appointments – even if work is labeled as ‘honorary’ or ‘guest,’ with or without salary support • Ongoing as well as completed research from the last three years that the applicant would like to highlight • 	
	Other Support:	<ul style="list-style-type: none"> • Include all resources and/or financial support from all foreign and domestic entities • List the number of person months associated with each project, regardless of whether salary support exists or if there is direct payment to the scientist • Include participation in foreign talent programs, or similar-type programs • Include in-kind contributions from domestic and foreign institutions or governments that support research activities • List post-doc, student, or visiting scholar supported by a foreign government or institution 	

		<ul style="list-style-type: none"> • In addition to listing grants and contracts, the agency expects the inclusion of other key resources, including but not limited to: <ul style="list-style-type: none"> ○ Financial support for laboratory personnel; ○ Provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.); ○ Data from another grant being shared should be included as other support; and ○ NIH FAQ 5: “Researchers with 9 month appointments who are working in a foreign institution during their off contract months must disclose that in their other support as another resource” 	
	Exclusions:	<ul style="list-style-type: none"> • Training awards, prizes, or gifts do not need to be included • “in the interest of full transparency, recipients should err on the side of disclosure” (NIH FAQ 7) 	
	Notes:	<ul style="list-style-type: none"> • For proposals: in the Collaborators and Consultants section, include international collaborations, <i>even if they are not funded</i> 	
<i>National Science Foundation (NSF)</i>	When:	<ul style="list-style-type: none"> • At the time of proposal • As needed prior to the award • Update annually via progress reports 	NSF Disclosures Table NSF PAPPG Chapter II C 2 h NSF FAQs on current and pending NSF Biosketch Format Also subject to fCOI disclosure requirements:
	Biosketch:	<ul style="list-style-type: none"> • Undergraduate, graduate, and postdoctoral training, including location, major/area and degree and year • Current and past appointments • Honors and awards, including talent grants • Honorary appointments (including unpaid) • Effective October 5, 2020 NSF requires the use of 1 of 2 NSF-approved formats, one of which is the NIH compatible SciENCv 	
	Other Support:	<ul style="list-style-type: none"> • “[Include all current and proposed projects] or activities requiring a portion of time of the PI and any other senior personnel ..., even if they receive no salary support from the project(s)” • In-kind contributions not intended for use on the project/proposal being proposed to NSF and have an associated time commitment • Consulting that falls outside of an individual’s appointment 	

		<ul style="list-style-type: none"> • Travel supported/paid by an external entity to perform research activities with an associated time commitment • Startup company based on nonorganization-licensed IP • “All current project support from whatever source (e.g., Federal, State, local, foreign, public or private foundations, industrial or other commercial organizations, or internal funds allocated toward specific projects) must be listed” 	NSF PAPPG Chapter IX A
	Notes:	<ul style="list-style-type: none"> • For proposals: indicate international collaborations, even if they are not funded, by checking field 4.6 on the cover page and describing the activities in the project description • Include all international travel, including conferences • Document work at international NU campuses as an international collaboration 	
<i>Department of Defense, including DARPA (DOD)</i>	When:	<ul style="list-style-type: none"> • For all research and research-related educational proposals submitted after April 20, 2019 • Upon request for update / further details 	Memorandum pursuant to NDAA FY19, dated March 20, 2019
	Biosketch /Other Support:	<p>All key personnel, whether or not the individuals' efforts under the project are to be funded by the DoD must disclose:</p> <ul style="list-style-type: none"> • The total amount of support the individual is receiving in connection to each of the other research projects or will receive if other proposals are awarded • Name and address of the agencies and/or other parties supporting the other research projects 	Dear Colleague Letter dated October 10, 2019
	Notes:	For all other types of grants, inclusion is optional	
<i>Department of Energy (DOE)</i>	Notes:	<ul style="list-style-type: none"> • DOE does not currently have a prescriptive format for the disclosure of other support • DOE has been participating in discussion with other key research-funding agencies, including NIH, NSF and DOD • DOE has banned DOE personnel and contractor personnel from participating in foreign talent programs as outlined in DOE Order 486.1 • DOE announced an intention in their January 31, 2019 memorandum to do the same for recipients of grants and cooperative agreements, but the final steps towards implementation have not yet been finalized 	Memorandum dated December 10, 2018 Memorandum dated January 31, 2019 DOE Order 486.1 dated June 7, 2019

		<ul style="list-style-type: none"> • Participation by foreign nationals on DOE awards requires prior approval (DOE Order 142.3A) 	
<p><i>Northeastern Conflict of Interest and Commitment (COIC)</i></p>	<p>How does the annual COIC disclosure differ from current and pending support?</p>	<ul style="list-style-type: none"> • Annually, all faculty and staff are required to disclose all outside activities to Northeastern. • Northeastern assesses this information to determine if there is a conflict of interest and/or commitment between outside activities and the employee’s responsibilities to the University. • The information provided by this process is treated as confidential. • When a funding agency requires Northeastern to perform an individual financial conflict of interest assessment, the information gathered from the COIC process is used to complete the review. • Even when a disclosure is required by the regulation, only the information required by regulation is shared with the funding agency. • Funding agencies require biosketches and other support (current and pending) in every proposal for the purpose of evaluating scientific overlap. • The system(s) for evaluating scientific overlap and conflict of interest do not intersect. • <i>The individual investigator must ensure alignment between these documents.</i> 	<p>Policy on Conflict of Interest and Commitment</p> <p>Policy on Financial Conflict of Interest Related to Research</p>