



POLICY STATEMENT

Policy Statement Title: Sponsored Research Disclosure Requirements Policy

Functional Area: Research Administration

Effective Date: October 1, 2025
Approved by: Alexa Van Dalsem, Senior Director, Office of Contracts and Grants
Responsible Offices: Office of Contracts and Grants
Policy Contact: Alexa Van Dalsem
Last Reviewed/Updated: October 1, 2025

Reason for Policy: This policy is created to comply with federal requirements surrounding disclosure requirements for Senior/Key Personnel leading and participating on sponsored projects.

I. INTRODUCTION

There are a variety of institutional and sponsor requirements that are mandatory and must be met when participating in a sponsored project, including requirements related to conflicts of interest and commitment. It is essential that the University of Colorado Boulder (CU Boulder) and Senior/Key Personnel comply with these requirements to support research integrity, to maintain public trust, and to continue receiving sponsored funding. The purpose of this policy is to establish expectations for conflict of interest and commitment disclosure requirements ("disclosure requirements") for persons participating in sponsored projects.

There are serious consequences at both a personal and institutional level for failing to complete disclosures. The Office of Contracts and Grants (OCG) is committed to advancing CU Boulder's mission as a national public research university by ensuring that researchers meet university disclosure requirements as well as our sponsor's Other Support requirements.

II. DEFINITIONS

Conflict of Commitment: Refers to a situation in which outside relationships or activities interfere with, or have the appearance of interfering with, an employee's commitment to their university duties or responsibilities. (See University of Colorado [APS #5012](#) Conflicts of Interest and Commitment in Research and Teaching).

Conflict of Interest: Refers to a situation in which financial, professional or other personal considerations may directly or indirectly affect, or have the appearance of affecting, an employee's professional judgment in exercising any university duty or responsibility in administration, management, instruction, research or other professional activities. This can include interests that bias the nature or direction of scholarly research or influence decisions with respect to teaching and students, appointments and promotions, use of university resources, interactions with human subjects or other matters of interest to the university. (See University of Colorado [APS #5012](#) Conflicts of Interest and Commitment in Research and Teaching).

Foreign Talent Recruitment Program: The [National Security Presidential Memorandum 33](#) (NSPM-33) defines Foreign Talent Recruitment Program as: “an effort directly or indirectly organized, managed, or funded by a foreign government or institution to recruit science and technology (S&T) professionals or students (regardless of citizenship or national origin, and whether having a full-time or part-time position).”

Just-in-Time (JIT): The process used by the National Institutes of Health (NIH) to collect important, time-sensitive information, including Other Support documents, from grant applicants after the initial review and before an award is made.

Malign Foreign Talent Recruitment Program: A Malign Foreign Talent Recruitment Program (MFTRP) is an effort by a foreign government to recruit science and technology professionals or students with the intent to acquire resources to further their military and economic goals. CU Boulder has adopted a policy that prohibits all employees (including faculty, postdocs and staff) from participating in a MFTRP.

Principal Investigator: The individual(s) designated by the applicant organization to have the appropriate level of authority and responsibility to direct the project or program to be supported by the award. The applicant organization may designate multiple individuals as program directors/Principal Investigators (PD/PIs) or Co-Principal investigators (Co-PI/Is) who share the authority and responsibility for leading and directing the project, intellectually and logistically.

Other Support: The NIH Grants Policy Statement (GPS) Section 2.5.1 states, “Other support includes all resources made available to 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 the institution the researcher identifies for the current grant.” Some federal sponsors, such as NSF, refer to similar resources available to researchers as “current and pending support.” Other support is typically a concept used in grants administered under 2 CFR 200, Uniform Guidance. Contracts administered under the Federal Acquisition Regulations (FAR) may have requirements for conflicts of interest reporting.

Research Performance Progress Report (RPPR): The RPPR is a format for federal reporting annual progress on a sponsored project. Certain changes in other support must be disclosed with the submission of the annual RPPR, dependent on sponsor requirements.

Senior/Key Personnel: Designation of Senior/Key Personnel roles is determined by the Principal Investigator based on sponsor definitions of roles and responsibilities and the level of involvement with the activity by project individuals. Many sponsors consider Senior/Key Personnel as those who contribute in a substantive, meaningful way to the scientific or creative development or execution of a project, whether or not their salaries are paid for by a project. Senior/Key Personnel typically possess expertise or responsibilities that are indispensable to the project's success and may include Principal Investigators, Co-Principal Investigators, Co-Investigators, project managers, lead researchers, and other key contributors whose involvement is crucial for achieving the project's objectives, meeting sponsor requirements, and ensuring integrity and compliance. Senior/Key Personnel are typically identified in sponsored project proposals and awards and are expected to devote a significant portion of their time and effort to the project to ensure its effective implementation and outcomes.

Significant Financial Interest: A financial interest received from or held in an entity outside of the University that reasonably appears to be related to your Institutional Responsibilities and that meets or exceeds the thresholds established in accordance with current funding agency regulations. (See [RIO's Conflicts of Interest and Commitment FAQs](#)).

III. POLICY STATEMENT

Conducting research comes with a range of responsibilities, including compulsory reporting and disclosure requirements. These reporting and disclosure requirements include items related to actual or perceived conflicts of interest and commitment as follows:

- All faculty, other employees, or students with responsibility for the purpose, design, conduct or reporting of research must complete CU Boulder's [Disclosure of External Professional Activities \(DEPA\) Form](#) to disclose significant financial interests, personal interests, and external professional activities, including foreign talent recruitment programs, that reasonably appear related to institutional responsibilities.
- Sponsor-mandated other support disclosure reporting when applying for sponsored projects through proposal applications and Just-in-Time documents or completing annual reports for existing projects. Refer to [the OCG website](#) for sponsor-specific details and definitions of what should and should not be included.

CU Boulder expects Principal Investigators and other Senior/Key Personnel to comply with sponsor requirements related to the completion of other support documents and the disclosure of other support sources.

While different sponsors may have different requirements, effective 10/01/2025, the National Institutes of Health (NIH) specifically stipulates that Senior/Key Personnel complete training on other support disclosure requirements pursuant to [NIH Guide Notice NOT-OD-25-133](#), "NIH Announces a New Policy Requirement to Train Senior/Key Personnel on Other Support Disclosure Requirements." This requirement is met through CU Boulder's [Research Security Training](#) and related completion requirements.

IV. RELATED DOCUMENTS AND RESOURCES

[Conflicts of Interest & Commitment](#)

[Disclosure and Reporting Requirements Related to Foreign Support of Research](#)

[Disclosing Other Support](#)

[External Activities Disclosure & Foreign Talent Recruitment Programs](#)

[NIH Disclosure Requirements Policy Announcement](#)

V. HISTORY

Changes	Date	Approved By
Adopted	09/30/2025	Alexa Van Dalsem