

Policy on Research Security and Disclosure of “Other Support”

Effective Date: October 10, 2025

Purpose/Background

- This policy identifies requirements for training and disclosures by Bates faculty and staff who wish to apply for federal funding so that they and Bates remain in compliance with Research Security and Other Support Disclosure requirements of federal funding agencies.
- This policy complies with Federal funding requirements in alignment with [NSF Important Notice No. 149](#), NIH Notices [NOT-OD-25-133](#), and [NOT-OD-21-073](#) and Department of Energy Financial Assistance Letters [No. FAL 2022-04](#) and [No. FAL 2025-02](#) and with the CHIPS and Science Act of 2022 (P.L. 117-167) and National Security Presidential Memorandum-33 (NSPM-33)

Research Security regulations aim to safeguard US science and engineering research from inappropriate influence and conflicts of interest. To maintain the integrity of, and public trust in, the research enterprise, funding agencies require that researchers

1. undertake training in identifying and preventing potential threats to their research and
2. disclose all resources made available to the 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 their current grant.

This information is reviewed by funding agency staff to ensure the following:

- Sufficient levels of effort are committed to the project.
- There is no scientific, budgetary, or commitment overlap.
 - Scientific overlap occurs when (1) substantially the same research is proposed in more than one application or is submitted to two or more funding sources for review and funding consideration or (2) a specific research objective and the research design for accomplishing the objective are the same or closely related in two or more applications or awards, regardless of the funding source.
 - Budgetary overlap occurs when duplicate or equivalent budgetary items (e.g., equipment, salaries) are requested in an application but already are provided by another source.
 - Commitment overlap occurs when an individual's time commitment exceeds 100 percent, whether or not salary support is requested in the application.
- Only funds necessary for the approved project are included in the award.
- Any foreign resources that meet the definition of a foreign component have received appropriate [prior approval](#).

These trainings and disclosures help ensure transparency and the integrity of the US science and engineering research enterprise.

Policy Statement

Part I: Training

Principal Investigators (PIs), co-Principal Investigators (co-PIs), and any individual listed as key/senior personnel (from here out: senior personnel) on a proposal to the federal funding agencies listed below must complete Research Security training within the 12 months prior to submission of a proposal:

- National Science Foundation (NSF)
- National Institutes of Health (NIH)
- Department of Energy (DOE)

NIH specific

This training must be repeated by NIH awardees every 12 months.

In addition, prior to submission of an Other Support document, all senior personnel on a proposal to the National Institutes of Health must complete training on the requirements for disclosure of other support to ensure they fully understand their responsibilities.

Part II: Disclosures

- All senior personnel on a research proposal to or award from a federal funder must disclose to the funder and to Bates College any relationships or agreements with external organizations that are required by the funder on the Biographical Sketch and Current and Pending or Other Support document.

NSF specific

Senior personnel on NSF proposals must make disclosures as specified in the [NSPM-33 Implementation Guidance](#) Pre- and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending (Other) Support.

NIH specific

Senior personnel on NSF proposals must make disclosures as specified in the [NIH Pre-award and Post-award Disclosures](#) Relating to the Biographical Sketch and Current and Pending (Other) Support.

DOE specific

Senior personnel on DOE proposals must disclose all Current and Pending Support, where this term has the same meaning as the term Other Support as applied to researchers in NSPM-33.

NASA specific

Senior personnel on NASA proposals must make disclosures as specified in the [NASA Pre-award and Post-award Disclosure Requirements](#) table.

- Senior personnel on federal proposals and awards must provide to Bates College supporting documentation, including copies of contracts, grants, or any other agreements that must be disclosed on the Biosketch and/or Current and Pending Support or Other Support documents. If the contracts, grants or other agreements are not in English, the individual must provide translated copies. Bates College will maintain any records for the record retention period of the project/award after which time they will be destroyed in accordance with Bates' [Records Retention Policy](#), [Records Retention Schedule](#), and [Policy on Research Misconduct](#).

NSF specific

These agreements will be made available to the funding agency upon request from the funder.

Bates College will submit updated Current and Pending Support information to NSF within 30 days of discovery of any failure by senior personnel to disclose required Current and Pending Support information on a proposal.

NIH specific

Senior personnel must submit to NIH supporting documentation, including copies of contracts, grants, or any other agreements specific to senior/key personnel foreign appointments and/or employment with a foreign institution, and translated copies of all documents that are not in English, for all foreign activities and resources that are reported in Other Support.

Bates College will submit updated Other Support information to the Grants Management Specialist named in the Notice of Award as soon as any failure by a PI or other Senior/Key personnel on an active NIH grant to disclose Other Support information outside of Just-in-Time or the RPPR, as applicable, becomes known.

DOE specific

These agreements will be made available to the funding agency upon request from the funder.

NASA specific

Bates College will submit updated Current and Pending Support information to NSF within 30 days of discovery of any failure by senior personnel to disclose required Current and Pending Support information on a proposal.

Process/Responsibilities

Part I: Training

- All PIs, co-PIs, and individuals listed as senior personnel on a research proposal to NSF, DOE, or NIH must complete Research Security training within the 12 months prior to submission of a proposal. The College subscribes to online Research Security training courses through the CITI Program to assist in compliance. For access to the CITI program and instructions to enroll in this course.
 - a. Go to <https://www.citiprogram.org/login>, then click on the REGISTER tab if you do not have an account already established. Follow the registration prompts to complete the account setup.
 - b. Once logged in, click on the “Courses” page.
 - c. Click on one of the “View Courses” links for the course listing of interest.
 - d. Click on “Add a Course” which takes you to the course enrollment questions where your responses will add the Research Security Training course.
 - i. The “Research Security Training (combined course) A condensed and combined single module course...” is sufficient to meet the training requirements.
 - e. Click “Start Now” button on the Research Security Training module to begin your training
 - f. Please email completed certificates and address any questions to the Office of Sponsored Programs and Research Compliance (sparc@bates.edu).

NIH specific

NIH awardees must complete/re-take Research Security training every 12 months for the life of their award.

Prior to submission of an Other Support document (typically during the JIT phase), senior personnel must review the [NIH Pre-award and Post-award Disclosures](#) Relating to the Biographical Sketch and Current and Pending (Other) Support for NIH-specific disclosure requirements.

- The Research Integrity Officer will oversee compliance with Research Security Training requirements. The Office of Sponsored Programs and Research Compliance will assist the Research Integrity Officer by maintaining records of training and communicating training requirements to senior personnel, as needed.
- The Office of Sponsored Programs and Research Compliance will assist faculty with meeting requirements for submission of certifications of compliance to funders.

Part II: Disclosures

- Prior to proposal submission and any time an individual listed as senior personnel on an NSF or NIH proposal or award enters into or modifies an agreement that must be reported on the Biosketch and/or Current and Pending Support or Other Support documents, the individual must complete the Bates College **Other Disclosures for Federal Funding [form](#)**.
 - Senior personnel must provide copies of all contracts, grants, agreements, etc that meet the threshold for inclusion on the Biographical Sketch and/or Current and Pending Support or Other Support documents.
 - English translation copies must be provided along with any documents that are not in English.
- The Office of Sponsored Programs and Research Compliance (SPaRC) and the Research Integrity Officer will maintain disclosure records for the record retention period of the project/award, after which time the records will be destroyed.

NSF specific

SPaRC will provide documentation of disclosures to NSF upon request, as required. SPaRC will notify the senior personnel prior to providing documentation to NSF.

NIH specific

It is the responsibility of the senior personnel to include all required documentation of foreign agreements to NIH as part of their Other Support Disclosure.

DOE specific

SPaRC will provide documentation of disclosures to DOE upon request, as required. SPaRC will notify the senior personnel prior to providing documentation to DOE.

Policy owner

- Office of the Vice President for Academic Affairs and the Dean of the Faculty
 - Research Integrity Officer - Associate Dean Don Dearborn - researchintegrity@bates.edu

Contact

- Sponsored Programs and Research Compliance - sparc@bates.edu