

NSF Foreign Influence Disclosures Guidance for VT Researchers

Virginia Tech remains committed to meeting regulatory compliance in all areas of education and research activities so that stakeholders are responsible stewards of public and private funding. Federal sponsors issue requirements for researchers to disclose their foreign and domestic affiliations, interests, and activities; therefore, researchers must promptly disclose to federal sponsors all relevant activities and information that bear on potential conflicts of interest and commitment. Disclosure remains part of the broader set of researchers' responsibilities to ensure objectivity, honesty, transparency, fairness, accountability, and stewardship. The information below specifies the [National Science Foundation's requirements](#) for foreign influence disclosures.

What do researchers disclose?

Pre-award and Post-award Disclosures: Biographical Sketch and Current and Pending Support

NSF Pre-award and Post-award Disclosures^{1/2/3}
 Relating to the Biographical Sketch and Current and Pending Support
 April 20, 2023

Table Key:
 * - disclosure required only
 # - if disclosure of the title of proposal submission

Type of Activity	Biographical Sketch	Current & Pending Support	Facilities, Equipment & Other Resources	Project Reports	Post-Award Information: Title & Location	Disclosure Not Required
Undergraduate, graduate, and postdoctoral training, including teaching, supervision and degree and title	✓					
Academic, professional or professional appointments, whether or not remuneration is received, and whether full-time, part-time, or voluntary	✓					
All projects (including the projects currently under consideration from whatever source, and all ongoing projects, irrespective of whether support is provided through the proposal) of identity to the institution, including other institutional activities that support the research activity for use on the project/proposal being proposed		✓		✓	✓	

The NSF publishes a reference table with essential information regarding pre-award and post-award disclosure information in the Biographical Sketch and Current and Pending Support proposal sections.

The table identifies where these disclosures must be provided in proposals as well as in project reports. View the most current table on the [NSF Pre- and Post-Award Table website](#).

Need help? Contact foreigninfl@vt.edu

How and when do researchers disclose?

Pre-Award Phase

Proposal Requirements:

- Use NSF-approved formats for [Biographical Sketches](#) and [Current and Pending Support](#).
- Current approved formats: BioSketch and the [NSF fillable PDF](#). The NSF prefers researchers use [SciENcv](#) for biosketches. (Fillable PDFs will not be accepted after October 2023; SciENcv will be required at that time, and soon there will be common Biosketch and Current and Pending (Other) Support forms available.)
- Use the Facilities, Equipment, and Other Resources section to report all in-kind contributions that support the research activity.

On the Proposal Cover Page:

- Researchers must select the box “Funding of a Foreign Organization” if the application proposes to fund a foreign organization (including subaward or consultant arrangement).
- For proposals with international activity, researchers must list the countries with which they will engage. International activity includes research, training, and/or education carried out in cooperation with international counterparts either overseas or in the United States using virtual technologies.

Post-Award Phase

Submission of Important Updates:

- If researchers discover that they have Current and Pending Support that was not disclosed at proposal submission, they must report the oversight to the Office of Sponsored Programs immediately. The OSP has 30 days to report the oversight to the NSF.
- Researchers must indicate changes in Active Other Support since proposal submission or the last reporting period in their annual and final project report.

Include in Post-award Project Reports:

- Any new projects and in-kind contributions not intended for use on the project but having a time commitment.
- Postdoctoral scholars, students, or visiting scholars who are supported by an external entity (whose research activities are not intended for use on the project/proposal being proposed to NSF) and have an associated time commitment.
- Consulting that is not undertaken as a part of your employment with Virginia Tech.
- Travel supported by an external entity to perform research activities with an associated time commitment.
- Startup company based on non-organization-licensed IP.
- Startup packages from other than the proposing organization.

Questions? Contact foreigninfl@vt.edu or view the [NSF Proposal and Award Policies and Procedures Guide](#). For additional training, the Office of Sponsored Programs offers [brief courses](#) on foreign influence disclosures.