UNIVERSITY OF SAN FRANCISCO | Office of Sponsored Programs

NASA Pre-Award and Post-Award Disclosure Policy

Requirements for all NASA Grant Applicants and Recipients

Summer 2026

UNIVERSITY OF SAN FRANCISCO | Office of Sponsored Programs

Policy Name

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Effective Date: June 10, 2026
Last Updated: July 21, 2026

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POLICY STATEMENT

In accordance with the requirements outlined in the National Aeronautics and Space Agency (hereafter, NASA) Grant Circular dated February 5, 2026, all senior/ key personnel

who are applying to or current recipients of NASA funded grants effective August 5, 2026 must complete all disclosure forms required by NASA. It is the responsibility of all applicants and current recipients to fill out the appropriate disclosure forms and work with the Office of Sponsored Programs to ensure their accuracy and completeness.

REASON FOR POLICY

This policy is in accordance with changes required for all NASA grant applicants and recipients, effective August 5, 2026. This document outlines the new requirements published by NASA for all key persons applying for and receiving NASA grant funding.

WHO SHOULD READ THIS POLICY

All key personnel who receive funding or are applying for funding from the National Aeronautics and Space Agency (NASA)

POLICY TEXT

I. Summary:

It is the policy of the University of San Francisco that all key personnel applying for and receiving funding from NASA must adhere to their disclosure policies and complete all required disclosure forms in a timely manner. All investigators must complete these forms in addition to the FCOI and COI disclosures required for all USF faculty.

NASA has outlined in detail all requirements for applicants here. All efforts will be made to keep this document up to date; however, it is the responsibility of NASA grant applicants to confirm that they are following the most recent requirements prior to submitting grant applications.

II. Pre Award Disclosure Requirements:

All investigators must complete the NASA Biographical sketch form along with their grant application. A copy of the biographical sketch form can be found here. The biographical sketch form includes information such as:

- Professional Preparation: Education and training history.
- Appointments and Positions: Academic, professional, or institutional roles (whether full-time, part-time, voluntary, or remunerated).

- Products: A list of products demonstrating the individual's qualifications to carry out the proposed project.

Additionally, investigators must disclose current and pending sources of support, such as:

- All R&D Resources: Any resource supporting the individual's R&D efforts (foreign or domestic, direct or via the entity, monetary or in-kind commitments of time like office/lab space, equipment, employees, or students).
- Specific Consulting Activities: Consulting that requires the person to perform research, is related to their research portfolio (impacting funding, effort commitments, or scientific integrity), or involves an agreement to conceal/withhold confidential financial/other ties.
- Externally Supported Personnel (Not for Project): Postdoctoral scholars, students, or visiting scholars supported by an external entity whose research is not intended for the proposed project but has a time commitment.
- External Travel Support: Travel paid by an external entity to perform research activities with a time commitment.
- Non-Organization-Licensed IP Startup: Startup companies based on Intellectual Property (IP) not licensed by the home organization.
- External Startup Packages: Startup packages provided by any entity other than the proposing organization (marked for new support only).
- Project-Specific In-Kind Contributions: In-kind contributions with an estimated dollar value of $5,000 or more that support the research activity and are intended for use on the proposed project/proposal.

Furthermore, NASA requires that all key persons "National Security Presidential Memorandum 33 (NSPM-33), individuals are required to disclose contracts associated with participation in programs sponsored by foreign governments, instrumentalities, or entities, including foreign government-sponsored talent recruitment programs." Applicants are also prohibited from involvement in "a malign foreign talent recruitment program", per 42 USC § 19232.

III. Post-Award Disclosure Requirements

Per the updated requirements for all NASA grant recipients, key persons are responsible for updating their award's NASA grant officer with funding and other kinds of support . Changes to certain activities must be disclosed post-award via annual performance reports. Additionally, if these activities were undisclosed at the time of application or in a performance report, they must be reported via email to the NASA Grant Officer and Technical Officer within **30 calendar days**. If any of the

following items changed since or were undisclosed during the pre-award phase, they must be included in project reports:

- Current and pending (other) support – (a) All resources made available, or expected to be made available, to an individual in support of the individual's research and development efforts, regardless of (i) whether the source is foreign or domestic; (ii) whether the resource is made available through the entity applying for a research and development award or directly to the individual; or (iii) whether the resource has monetary value; and (b) includes in-kind contributions requiring a commitment of time and directly supporting the individual's research and development efforts, such as the provision of office or laboratory space, equipment, supplies, employees, or students.
- In-kind contributions (i) with an estimated dollar value of $5,000 or more, (ii) not intended for use on the project/proposal being proposed, and (iii) have an associated time commitment.
- Travel supported/paid by an external entity to perform research activities with an associated time commitment.
- Current or pending participation in, or applications to, programs sponsored by foreign governments, instrumentalities, or entities, including foreign government- sponsored talent recruitment programs.
- Consulting activities under the proposals and active projects section of the form when any of the following scenarios apply: (i) the consulting activity will require the senior/key person to perform research as part of the consulting activity; (ii) the consulting activity does not involve performing research, but is related to the senior/key person's research portfolio and may have the ability to impact funding, alter time or effort commitments, or otherwise impact scientific integrity; or (iii) the consulting entity has provided a contract that requires the senior/key person to conceal or withhold confidential financial or other ties between the senior/key person and the entity, irrespective of the duration of the engagement.
- 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 and have an associated time commitment
- Travel supported/paid 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.

NASA has additionally provided a detailed table with the above requirements and pre award requirements here. Key Persons on NASA grants must report the above items utilizing NASA's CURRENT AND PENDING (OTHER) SUPPORT FORM, effective August 5, 2026.

The Office of Sponsored Programs at USF encourages all prospective and current NASA grant recipients to familiarize themselves with all Pre-Award and Post-Award disclosure requirements and to email the contacts listed in this document with any and all questions.

DEFINITIONS

Term	Definition
Key Personnel	Key Personnel is someone who: i) contributes in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a research and development award from a Federal research agency; and ii) is designated as a covered individual by the Federal research agency concerned. Consistent with NSPM-33, this means principal investigators (PIs) and other senior/key person seeking or receiving Federal research and development funding (i.e., extramural funding) and researchers at Federal agency laboratories and facilities (i.e., intramural researchers, whether or not federally employed), including Government-owned, contractor-operated laboratories and facilities.
In-kind contributions	Non-currency based items totalling $5,000 or more in value. These can include equipment, gifts, travel, etc.
Foreign Malign Influences	A term used by the United States federal government and security agencies to describe coercive, undeclared, and subversive acts by hostile foreign governments and their proxies.
Foreign country of concern	A designation created by the United States government to refer to other nations with which the USA has fraught diplomatic relations. As of writing, this means specifically the People's Republic of China, the Democratic People's Republic of Korea, the Russian Federation, the Islamic Republic of Iran, or any other country deemed to be a country of concern as determined by the Department of State.

Current and pending (other) support	i) All resources made available, or expected to be made available, to an individual in support of the individual's research and development efforts, regardless of (i) whether the source is foreign or domestic; (ii) whether the resource is made available through the entity applying for a research and development award or directly to the individual; or (iii) whether the resource has monetary value; and ii) includes in-kind contributions requiring a commitment of time and directly supporting the individual's research and development efforts, such as the provision of office or laboratory space, equipment, supplies, employees, or students. This term has the same meaning as the term Other Support as applied to researchers in NSPM-33. For researchers, Other Support includes all resources made available to a researcher in support of and/or related to all of their professional R&D efforts, including resources provided directly to the individual rather than through the research organization, and regardless of whether or not they have monetary value (e.g., even if the support received is only in-kind, such as office/laboratory space, equipment, supplies, or employees). This includes resource and/or financial support from all foreign and domestic entities, including but not limited to, financial support for laboratory personnel, and participation of student and visiting researchers supported by other sources of funding.
Foreign government-sponsored talent recruitment program	Effort organized, managed, or funded by a foreign government, or a foreign government instrumentality or entity, to recruit science and technology professionals or students (regardless of citizenship or national origin, or whether having a full-time or part-time position). Some foreign government-sponsored talent recruitment programs operate with the intent to import or otherwise acquire from abroad, sometimes through illicit means, proprietary technology or software, unpublished data and methods, and intellectual property to further the military modernization goals and/or economic goals of a foreign government. Many, but not all, programs aim to incentivize the targeted individual to relocate physically to the foreign state for the above purpose. Some programs allow for or encourage continued employment at United States research facilities or receipt of Federal research funds while concurrently working at and/or receiving compensation from a foreign institution, and some direct participants not to disclose their participation to United States entities. Compensation could take many forms including cash, research funding, complimentary foreign travel, honorific titles, career advancement opportunities, promised future compensation, or other types of remuneration or consideration, including in-kind compensation.

FORMS

Form	Use	Location

FREQUENTLY ASKED QUESTIONS

REVISION HISTORY

July/21/2026 - First publication of Policy.

APPENDICES

Appendix A

Appendix B