



UNIVERSITY OF
SAN FRANCISCO

Office of
Sponsored Programs

Pre-Award and Post-Award Disclosure Policy

Fall 2026

Pre-Award and Post-Award Disclosure Policy

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POLICY STATEMENT

Many Federal funding agencies require specific disclosures prior to submitting grant proposals, typically via what is known as the Biographical Sketch Form, or “BioSketch”. It is the responsibility of all prospective University of San Francisco applicants and recipients, including PIs and other senior and key personnel, to complete the requisite forms for the agencies to which they are applying for funding. This document outlines the information required by federal funding agencies as of last updating for the document. It is the responsibility of the applicant to work with the Office of Sponsored Programs and confirm that they are submitting all required disclosures for the award they are applying for.

REASON FOR POLICY

This policy is in accordance with changes required for all federal grant applicants in National Security Presidential Memorandum-33 (NSPM-33). It also helps clarify which federal funding agencies require what disclosures and forms.

WHO SHOULD READ THIS POLICY

All principal investigators, senior personnel and key personnel who receive funding or are applying for funding from any federal agency, including the PHS, NSF, NIH, NASA and the Departments of War (previously Defense) and Education.

POLICY TEXT

I. Summary:

It is the policy of the University of San Francisco that all principal investigators, senior personnel and key personnel applying for and receiving funding from any source must adhere to their disclosure policies in a timely manner. All investigators must execute these forms in addition to the Financial Conflict of Interest and Conflict of Interest disclosures required for all USF faculty.

Applicants for Federal Funding can find a summary of the disclosure requirements [here](#).

	Biosketch Formatting & Platforms	Current & Pending (Other) Support Requirements	Foreign Talent & Foreign Affiliation Disclosures	Certification & Pre-Award Enforcement
Department of Education (DoE)	Accepts NSPM-33 formatted biosketches or standard Curriculum Vitae (CV) / Resume	Requires disclosure of existing/pending projects to evaluate researcher capacity and avoid	Discloses foreign positions, consulting, and grants. Section 117 of the Higher Education Act	Institutional Authorized Organization Representative (AOR) and PI pre-award certification. Focuses on

	formats depending on the grant program (e.g., IES vs. OESE).	overlapping federal funding allocations.	requires institutional reporting of foreign gifts/contracts.	financial compliance and operational feasibility.
Department of War (DoW)	Uses NSPM-33 Common Forms or agency templates. Requires detailed background on professional preparation, appointments, and research experience.	Discloses all active/pending research, effort percentages, funding levels, and financial/non-financial support regardless of source.	Heightened review for foreign ties, foreign consulting, and foreign talents. Broad agency announcements (BAAs) require export control (ITAR/EAR) and security risk assessments.	Strict certification with clear penalties. DoD/DoW conducts rigorous pre-award risk evaluations; non-compliance results in immediate proposal rejection or debarment.
National Aeronautics and Space Administration (NASA)	Standardized biosketch submission via NSPIRES or Grants.gov following NSTC Common Form guidelines.	Detailed disclosure of all current and pending projects, time commitments, and laboratory/equipment resources.	Statutory China Restriction: Specific prohibition against bilateral research collaborations with China or Chinese-owned entities (Wolf Amendment), in addition to standard foreign disclosure rules.	Electronic signatures certifying disclosures. NASA performs risk-based pre-award security screenings on key personnel.
National Institutes of Health (NIH)	Uses Common Biosketch Form via SciENcv. Includes Personal	Requires disclosure of all active/pending projects, gifts, and in-kind	All foreign affiliations, honorary titles, and participation in	Senior/key personnel must sign/certify accuracy before submission.

	Statement, Positions/Appointments (3-year horizon), and Synergistic Activities.	resources via SciENcv. Must submit copies of foreign contracts/agreements.	foreign recruitment programs must be declared. Banned from participating in Malign Foreign Talent Recruitment Programs (MFTRPs).	Failure to disclose can lead to award revocation, institutional audits, or legal referral.
National Science Foundation (NSF)	Mandatory SciENcv format adhering strictly to NSPM-33 Common Forms. Excludes total funding amounts in biosketch but includes professional appointments.	Full disclosure of all projects, active or proposed, and in-kind research support (space, equipment, personnel) using SciENcv.	Mandatory disclosure of all foreign appointments, foreign consulting, and foreign funding. Participation in an MFTRP makes the individual ineligible for funding.	Pre-award certification by key personnel. NSF PAPPG mandates post-award notification within 30 days if undisclosed support is discovered.

II. Pre Award Disclosure Requirements:

All investigators must complete the required forms and disclosures per the sponsor's specifications.

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, per “[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 requirements of most federal award sponsors, investigators (PIs) and key personnel must update their award program officer on any changes to their status as listed in the pre-award disclosures. This requirement typically lasts through the grant term, but PIs are required to work with OSP to confirm grant award terms and conditions and alert the OSP team as well as the relevant sponsor staff of any changes.

- 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.

The Office of Sponsored Programs at USF encourages all prospective and current federal 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
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FREQUENTLY ASKED QUESTIONS

REVISION HISTORY

Oct 14/2026 - First publication of Policy.

APPENDICES

Appendix A

Appendix B