

Policy 2213

Disclosure of Other Support for Research Investigators

Date of Current Revision: September 2025

Responsible Officer: Vice President for Research, Economic Development and Innovation

1. PURPOSE

This policy outlines the maintenance of the integrity of research conducted at or under the auspices of James Madison University (JMU). This policy is designed to ensure compliance with the federal laws and regulations related to federally funded research. Further, JMU recognizes the importance of providing good stewardship of institutional and extramural funds.

2. AUTHORITY

The Board of Visitors has been authorized by the Commonwealth of Virginia to govern James Madison University. See Code of Virginia § 23.1-1600; § 23.1-1301. The board has delegated the authority to manage the university to the president.

STATE OR FEDERAL STATUTE AND /OR REGULATION

See the National Security Presidential Memorandum 33 (NSPM-33) on national security strategy for United States government-supported research and development. For grants from the National Institutes of Health (NIH), see [NIH Grants Policy Statement, section 2.5.1](#), as well as [NOT-OD-21-110](#) and [NOT-OD-25-133](#). For grants from the National Science Foundation (NSF), see [NSPM-33 Implementation Guide, PAPPG I.II.2.h.ii](#), as well as [Important Notice No. 149](#). For grants issued by the Department of Defense (DoD), see the memorandum titled [“Actions for the Protection of Intellectual Property, Controlled Information, Key Personnel and Critical Technologies.”](#) *This is not an exhaustive list; other federal agencies may have additional implementation guidance related to NSPM-33.*

3. DEFINITIONS

Investigator

The principal investigator, project director, co-principal investigator, or any other person regardless of title or position, who is responsible for the design, conduct, or reporting of research, educational, or other activities funded, or proposed for funding, by an external sponsor, which may include, for example, senior/key personnel, collaborators, or consultants.

Other Support

All resources made available to a researcher in support of and/or related to all of their research or sponsored project 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. This includes but is not limited to:

- Resources and/or financial support from all foreign and domestic entities that are available to the researcher. This includes, but is not limited to, financial support for laboratory personnel and provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.).

- Consulting agreements, when the covered individual will be conducting research as part of the consulting activities. Non-research consulting activities are not other support.
- In-kind contributions (e.g. office/laboratory space, equipment, supplies, or employees or students supported by an outside source).

Other support may include active, pending, or previous sources of support for an investigator's research and other sponsored activities. Other support does not necessarily have James Madison University as the recipient; for example, if a researcher with a joint appointment is listed as a principal investigator on an award to another institution, that award is a form of other support.

Sponsoring agencies frequently request information on other support as part of the proposal process, prior to the issuance of an award, and/or as part of a regular progress report.

4. APPLICABILITY

This policy applies to all JMU investigators engaging in federally funded research, scholarship, creative work, or similar project that is administered through or conducted under the auspices of their affiliation/association with James Madison University.

5. POLICY

It is the policy of JMU that all staff and faculty who engage in sponsored project activity comply with federal law, university policies, and sponsoring agency requirements regarding the provision of information on other support documents, current or pending support documents, or similar.

JMU requires that every disclosure to an external funding agency of a researcher's active, pending, or previous sources of support for research and other sponsored activities be current, accurate, and complete to the best of the researcher's knowledge.

6. PROCEDURES

6.1 Investigators must follow appropriate sponsor procedures in disclosing all other support, including using sponsor-provided forms and tools where relevant.

6.2 The requirement for disclosure applies at the time of proposal submission, prior to the award of support, as part of the annual progress report, and at any subsequent time the agency determines to be appropriate during the term of the award.

6.3 It is the responsibility of investigators to ensure consistency between disclosures made to JMU and those made to funding agencies. JMU's research administration will provide guidance to covered individuals on what needs to be reported to funding agencies based on sponsor requirements.

6.4 The investigator must ensure the accuracy and completeness of other support documents for the project team, in accordance with the application guidelines or the sponsor's instructions.

6.5 The investigator may be required to supply appropriate documentation to the Office of Sponsored Programs and/or University Council to enable the Authorized Organizational Representatives (AORs) within the Office of Sponsored Programs to make required attestations. Such documents may be retained by the Office of Sponsored Programs, particularly where required by sponsor policy. When necessary, investigators may be required to provide an English translation of relevant documents.

7. RESPONSIBILITIES

It is the responsibility of investigators to disclose all other support in compliance with federal law, university policies, and sponsor guidelines. It is also the responsibility of the investigator to ensure that the disclosures are complete, accurate, and current, both for themselves and for the project team (if relevant).

All departments, offices and employees that generate, receive, or maintain public records under the terms of this policy are also responsible for compliance with [1109](#) – Records Management.

8. SANCTIONS

Sanctions will be commensurate with the severity and/or frequency of the offense and may include termination of employment or expulsion from the university.

9. EXCLUSIONS

This policy does not apply to faculty and staff who are applying for funding unrelated to their JMU employment.

10. INTERPRETATION

The authority to interpret this policy rests with the vice president of research, economic development and innovation.

Responsible Executive

Vice President of Research, Economic Development, and Innovation

Previous version: N/A

Approved by the president: N/A