

James Madison University Office of Sponsored Programs-Administrative Services Standard Operating Procedures			
TITLE: Current and Pending Support/Other Support Documentation			
SOP # 4	Revision # 0	Effective Date: October 1, 2025	Page 1 of 7

OBJECTIVES

1. To describe the procedures in place to ensure compliance with [William M. \(Mac\) Thornberry National Defense Authorization Act for Fiscal Year 2021, Section 223\(a\)\(1\) \(42 U.S.C § 6605\(a\)\(1\)\)](#) as well as [NSPM-33](#), which (regarding current & pending support documents) requires that “individuals disclose associated contract(s), upon request of the recipient research institution or the funding agency, in addition to the fact of participation”.

Many agencies have interpreted this guidance to require recipient institutions to maintain copies of supporting documentation related to foreign support disclosed on Current and Pending Support/Other Support forms. See [NSF Important Notice No. 149](#):

NSF proposers and recipients are required to maintain supporting documentation, including copies of contracts, grants, or any other agreements specific to foreign appointments, employment with a foreign institution, participation in a foreign talent recruitment program and other information reported as current and pending (other) support for all senior/key personnel that must be available to NSF upon request.

Proposers and recipients are expected to review requested supporting documentation for compliance with NSF award terms and conditions.

as well as the [NIH Grants Policy Statement](#):

For Other Support submissions that include foreign activities and resources, recipients are required to submit copies of contracts, grants, or any other agreement specific to senior/key personnel foreign appointments and/or employment with a foreign institution as supporting documentation. If they are not in English, recipients must provide translated copies. This does not include personal service contracts, or employment contracts for fellows supported by foreign entities.

The [Department of Energy](#) and the [USDA](#) also require that supporting documentation be provided upon request.

2. To describe the procedures in place to comply with [NIH NOT-OD-25-133](#) requiring all Senior/Key Personnel to be trained on disclosure requirements, as well as [NASA](#) requirements that institutions certify that they have made covered individuals aware of their obligations and they have complied.

GENERAL DESCRIPTION

<p style="text-align: center;">James Madison University Office of Sponsored Programs-Administrative Services Standard Operating Procedures</p>		
SOP # 4 Revision #0	TITLE: Current and Pending Support/Other Support Documentation	Page: 2 of 7

JMU [Policy 2213](#) requires investigators to disclose all relevant support, whether financial or non-financial, in their current and pending support/other support documents as required by sponsors. Furthermore, the policy authorizes the Office of Sponsored Programs-Administrative Services (OSP-AS) to collect necessary documents in order to make necessary attestations and to retain the documents where required by sponsor policy. It further specifies that OSP-AS may require investigators to provide English translations of the documents if necessary.

This SOP describes the documents that OSP-AS will request for different types of support, the review OSP-AS will take of the submitted documents, and how the documents will be stored if necessary.

DEFINITION

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).

Note that sponsors may have additional requirements regarding what should be classified as other support; for example, the NSF requires the current proposal to be listed on current and pending support.

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.

James Madison University Office of Sponsored Programs-Administrative Services Standard Operating Procedures		
SOP # 4 Revision #0	TITLE: Current and Pending Support/Other Support Documentation	Page: 3 of 7

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.

Current and Pending Support/Other Support

A form required by sponsors in which investigators are required to disclose sources of support.

RESPONSIBILITY

Execution of SOP: Office of Sponsored Programs-Administrative Services staff, with members of the Office of Research Development (ORD) assisting as outlined below.

PROCEDURES

NIH-Specific Training Requirement

When a PI discloses that they are pursuing funding from the NIH, either directly or as a subawardee, a member of OSP-AS will schedule a face-to-face meeting with the investigator as well as any other JMU employees identified as Senior/Key Personnel. This meeting may be in-person or on Zoom. At this meeting, the grants specialist will ensure all Senior/Key Personnel are familiar with:

- JMU Policy 2213 (“Disclosure of Other Support for Research Investigators”)
- NIH Requirements for Disclosure of Other Support, Foreign Components, and Conflicts or Interest. This can be done, for example, by reviewing the [NIH disclosure table and Applicant/Recipient Institution Responsibilities](#).

Generally, the staff member who will schedule this meeting will be the assigned grants specialist assisting with budget development. If no member of OSP-AS is available, or if for some reason it is more convenient, a member of the Office of Research Development may conduct the meeting. They will confirm, in writing, to OSP-AS that the training was completed.

A note indicating the date of the meeting as well as the name of the staff member who conducted it will be stored with the proposal documents for NIH submissions, subject to the same data storage and retention policies as the other proposal materials.

Secondly, OSP-AS will confirm that that all Senior/Key Personnel have completed the required Research Security Training, which includes training on appropriate disclosures on Current & Pending Support/Other Support documents.

NASA-Specific Training Requirement

James Madison University Office of Sponsored Programs-Administrative Services Standard Operating Procedures		
SOP # 4 Revision #0	TITLE: Current and Pending Support/Other Support Documentation	Page: 4 of 7

Since the SECURE Research Security Training covers mandatory disclosures in current and pending support. OSP-AS staff will confirm that applicants for NASA funding have completed the SECURE Research Security Training or an equivalent program prior to submission.

Supporting Documentation for Other Support (JMU Investigator)

When a PI is required to complete a current & pending/other support form for federal funding (regardless of whether JMU is the direct awardee or a subrecipient):

When a PI discloses a source of other support, OSP-AS will request supporting documentation. Examples of the types of supporting documentation OSP-AS will generally request are outlined below:

- *For pending sponsored support:* A copy of the submitted proposal. If the proposal was submitted by OSP-AS, the proposal number is sufficient. (Note: This does not apply to the proposal being developed, if the sponsor requires to list the proposal being submitted as pending.)
- *For awarded sponsored support:* A copy of the award document. If the award was processed by OSP-AS, the award number is sufficient.
- *If the support is research materials, data, or similar:* A copy of the corresponding data use agreement, material transfer agreement, etc. If the support is current, a signed copy is necessary. If the support is pending, a draft is sufficient.
- *For appointments (including affiliate appointments) at other institutions:* A signed copy of the relevant contract or MOU. This must specify whether any financial compensation is included and/or what resources the PI has access to through the appointment.
- *For other support (consulting services, in-kind support):* A signed copy of the relevant contract or MOU. This must specify whether any financial compensation is included and/or what resources the PI has access to through the appointment.

OSP-AS reserves the right to request alternative or supplemental documentation as needed to verify the information on the current & pending/other support form, make the necessary attestations, and/or comply with sponsor regulations. OSP-AS may also require investigators to supply translations of documents as necessary for the same reasons.

Supplemental documentation is required for each entry on a current & pending/other support document.

An Authorized Organizational Representative (AOR) in OSP-AS will then review the submitted documentation to ensure that the information matches what is disclosed on the current and pending/other support document and that it does not indicate that the PI is participating in the Malign Foreign Talent Recruitment Program. OSP-AS will also store the document as described below to ensure JMU is able to comply with NSPM-33 and sponsor requirements. If necessary,

James Madison University Office of Sponsored Programs-Administrative Services Standard Operating Procedures		
SOP # 4 Revision #0	TITLE: Current and Pending Support/Other Support Documentation	Page: 5 of 7

OSP-AS will also ensure the document is included as part of the proposal packet for sponsors who require this.

As part of this process, the AOR who is reviewing the material will redact any material on JMU's [highly confidential data list](#) before storing the supporting documentation, as outlined below. If redaction is necessary and if the sponsor requires the supporting documentation to be submitted, the redacted version will be used unless the sponsor expressly forbids redaction. If the PI wishes for other material to be redacted, they should communicate with the AOR to determine whether this is permissible.

If the document indicates the involvement a foreign institution or foreign government, OSP-AS will consult with International Research and Engagement Services (IRES) to determine whether additional compliance requirements apply.

Exception: If investigators are completing an updated current and pending support document during an award, and OSP-AS already has the relevant supporting documentation, they may work with the AOR to consult the existing stored supporting documentation instead of re-submitting it, when this is appropriate. OSP-AS (and the AOR assisting the investigator more specifically) reserves the right to request updated support documentation as they deem appropriate for compliance purposes.

Sponsor	Submitted with Proposal?
NSF	No (unless specifically requested)
NIH	Yes (if foreign-related)
USDA	Yes
DoE	No (unless specifically requested)

Supporting Documentation for Other Support (Subawardees)

When JMU requests current & pending/other support documents from a subrecipient or potential subrecipient for a federal grant, JMU will require the AOR providing the documents to certify:

- They have appropriately reviewed support documents for the current & pending/other support, in compliance with federal regulation and agency requirements.
- They will maintain supporting documentation in line with federal regulation and agency requirements.
- They will provide the supporting documentation if it is requested from the sponsor.

Data Security

James Madison University Office of Sponsored Programs-Administrative Services Standard Operating Procedures		
SOP # 4 Revision #0	TITLE: Current and Pending Support/Other Support Documentation	Page: 6 of 7

OSP-AS recognizes the sensitivity of these documents and will be stored consistent with JMU [Policy 1204](#), JMU's [Policy 1205](#), and the additional guidance in JMU's [Data Stewardship Standard](#).

When the supporting documentation is documentation provided directly by OSP-AS (e.g., proposal packets or award documents that OSP-AS has on record), the existing data security procedures will be followed.

For audit and compliance purposes, documents provided by investigators will be stored within a shared folder on JMU-approved systems (e.g., sharepoint) accessible only to OSP-AS's AORs. Note that if the materials are also included within the proposal materials, then a copy may also be stored as part of the completed proposal packet, which following standard OSP-AS procedures is generally accessible to all OSP-AS staff.

Documents will be deleted when no longer needed for compliance purposes, following standard procedures. For unfunded proposals, materials are generally deleted after three years. For funded awards, materials are generally deleted five years after the conclusion of the award.

REVISION HISTORY

Version No.	Brief Description of Changes	Created on Date
00	Creation of SOP	

SIGNATURE HISTORY

Name and Title	Signature	Date
Lauren Pearce Interim Director of Research Development and Pre-Award Services	<i>Lauren Pearce</i>	10/1/2025

REFERENCES

James Madison University Office of Sponsored Programs-Administrative Services Standard Operating Procedures		
SOP # 4 Revision #0	TITLE: Current and Pending Support/Other Support Documentation	Page: 7 of 7

[JMU Policy 1204](#)

[JMU Policy 1205](#)

[JMU Policy 2213](#)

[JMU Data Stewardship Standard](#)