

Policy on Disclosure of Other Support

Effective Date: April 2, 2026
Supersedes: n/a
Policy Review Date: To be reviewed every 1 year from effective date
Issuing Authority: Research Foundation President
Policy Owner: VP Sponsored Programs & Regulatory Affairs
Contact Information: RFCOSponsoredPrograms@rfsuny.org

Reason for Policy

Federal sponsors require funding recipients of contracts, grants, and cooperative agreements to disclose information on other active and pending support (“Other Support”) to ensure there is no scientific, budgetary, or commitment overlap with other projects, to assess the investigator’s capacity to complete the proposed work, and to maintain transparency and accountability. The importance of these disclosures has grown in recent years as the government has become increasingly concerned with espionage and undue foreign influence targeting the research community. As a result, federal scrutiny of Other Support has increased.

Statement of Policy

Investigators must accurately and completely disclose all active and pending research support (“Other Support”) to their federal sponsor(s) in accordance with specific sponsor requirements. These requirements may differ from sponsor to sponsor, and Investigators must be aware of specific sponsor requirements regarding:

- when to disclose Other Support (e.g., at the time of proposal submission, prior to award, and annually with the progress report);
- what Other Support to disclose (note the sponsor’s specific definition of Other Support); and
- how to disclose Other Support (sponsors may require disclosure using specific forms or tools).

Investigators are responsible for understanding and following the disclosure requirements for each federal sponsor they receive funding from.

Responsibilities

The following table outlines the responsibilities for compliance with this Policy:

Responsible Party	Responsibility
Investigators (SUNY or RF employees who are the project director or principal investigator, senior key personnel, and any others, including students or post-doctoral fellows, regardless of	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

Responsible Party	Responsibility
title or position, who are responsible for the design, conduct or reporting of federally funded research, or proposed for such funding, which may include, for example, collaborators or consultants.)	Investigator to ensure that the disclosures are complete, accurate, and current, both for themselves and for the project team (if relevant).

Definitions

Other (Current and Pending) 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.

Investigator- A SUNY or RF employee who is the project director or principal investigator, senior key personnel, and any other person, including a student or post-doctoral fellow, regardless of title or position, who is responsible for the design, conduct or reporting of federally funded research, or proposed for such funding, which may include, for example, collaborators or consultants.

Related Information

[Conflicts of Interest in Public Health Service Sponsored Programs Policy](#)

Forms

None

Change History

Date	Summary of Change
April 2, 2026	New Policy

Feedback

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