



KEAN

POLICY ON DISCLOSURE OF OTHER SUPPORT FOR RESEARCH

Policy Statement

All individuals designated as senior/key personnel on federal research proposals and awards must disclose all sources of other support including (but not limited to) domestic and foreign research support, in-kind contributions (e.g., lab space, equipment, personnel), appointments and affiliations (paid or unpaid), other significant financial interests, and conflicts of interest. Disclosures must be made at the time of proposal submission, during Just-in-Time (JIT) processes, in annual and final progress reports to funding agencies, or whenever there is a significant change in support or affiliations.

Overview

To ensure Kean University maintains compliance with federal regulations, including 2 CFR Part 200 and agency-specific requirements (e.g., NIH, NSF, DoEd), this policy establishes institutional standards for the disclosure of other support, foreign components, and financial conflicts of interest by individuals involved in federally funded research. This policy applies to all Kean University faculty, staff, and other personnel who are involved in the preparation, submission, or management of federally funded research proposals and awards.

Definitions

- **Other support** (i.e. in-kind contributions) includes all resources made available to a researcher in support of and/or related to all of their research endeavors, regardless of whether they have monetary value or are based at the institution.
- **Foreign Components** are any significant scientific element or segment of a project outside of the United States.
- **Conflicts of interest** include financial interests that could directly and significantly affect the design, conduct, or reporting of federally funded research.

Regulatory Framework

Failure to properly disclose other support may result in administrative actions including suspension or termination of federal awards. 2 CFR § 200.113 requires mandatory disclosures of violations involving fraud, conflict of interest, bribery, or gratuity violations. NIH Policy (NOT-OD-21-110, NOT-OD-22-210, and NOT-OD-25-133) mandates full transparency regarding other

support, foreign components, and financial conflicts of interest. *NSF Policy* (PAPPG II.D.2.h(ii)) requires documentation of an individual's proposed and active projects and sources of support.

Disclosure of Other Support at Kean University

It is incumbent upon all investigators to provide complete and accurate disclosures. Departmental administrators may assist in collecting disclosures. The Office of Research and Sponsored Programs (ORSP) will assist investigators in submitting disclosures to the appropriate federal agency. To assist in this effort, ORSP staff will work with Investigators to complete all relevant disclosure forms during proposal development. Institutional officials review disclosures for completeness and potential conflicts. When potential conflicts are identified, they will be referred to the Conflict of Interest (COI) Committee for review and evaluation. Investigators must update disclosures annually and/or upon any material change. All Kean personnel subject to this policy must complete annual training on disclosure requirements as part of the responsible and ethical conduct of research course available via the CITI program.

Compliance

Failure to disclose other support exposes both the university and the researcher to penalties and sanctions such as the loss of research funding. Thus, it is important that faculty, staff, and other researchers understand their obligations under the regulations and take the requisite steps to comply. The penalties for violating the disclosure of this policy are detailed below.

A. University-Imposed Penalties for Non-Compliance

The investigator will cooperate with the relevant federal agencies to provide and update disclosures of outside support. The investigator will also provide ORSP and the Conflict of Interest (COI) Committee any information requested regarding support external to Kean University. If a plan to manage a potential conflict is required, ORSP will coordinate the process of developing an appropriate management plan in consultation with the investigator. Failure to comply with this policy can result in disciplinary action, up to and including termination.

B. Criminal, Civil, and Administrative Penalties

False, fictitious, or fraudulent statements or claims (including intentional omissions) in violation of this policy may result in university and sponsor administrative, civil, or criminal penalties.