

 Weill Cornell Medicine	WCM Administrative Policy and Procedure	
	Policy Title	Disclosure of Other Support for Researchers
	Policy Number	OSRA-210.01
	Department/Office	Office of Sponsored Research Administration
	Effective Date	September 15, 2026
	Last Reviewed	N/A
	Approved By	WCM-Executive Policy Review Committee
	Approval Date	September 15, 2026

Purpose

This policy establishes institutional requirements for the disclosure of Other Support for researchers. It is intended to ensure compliance with federal law, Uniform Guidance, sponsor requirements, and research security expectations. The policy promotes transparency regarding research resources, commitments, affiliations, and activities so that sponsors can accurately assess scientific overlap, budgetary overlap, and investigator capacity.

Scope

This policy applies to all Weill Cornell Medicine (WCM) and Weill Cornell Medicine-Qatar (WCM-Q) Workforce Members participating in sponsored projects at WCM, including federally funded, non-federally funded, industry-sponsored, foundation-sponsored, and internally funded research activities.

Policy

WCM requires complete, accurate, and timely disclosure of Other Support whenever required by a sponsor. Researchers must disclose active, pending, and, where required, prior support regardless of source, recipient institution, or geographic location. This obligation includes support provided through domestic institutions, foreign institutions, professional appointments, collaborations, and In-Kind Contributions. Researchers are personally responsible for the accuracy of information submitted on their behalf.

In support of federal research security requirements, all individuals subject to this policy who participate in federally sponsored research must complete required Research Security Training (RST) on an annual basis. Researchers are responsible for understanding and complying with applicable research security, disclosure, and transparency requirements as a condition of participating in sponsored research activities.

Definitions

In-Kind Contributions: Non-monetary resources such as laboratory space, equipment, materials, data sets, or personnel support.

Key Personnel: Individuals designated by the sponsor as contributing in a substantive and measurable way to the scientific development or execution of a project.

Malign Foreign Talent Recruitment Program (MFTRP): Any program, position, or activity sponsored by a foreign country (or its entities) that seeks to recruit science and technology talent and that includes one or more prohibited characteristics intended to:

- Transfer U.S.-funded research, intellectual property, data, know-how, or expertise to a foreign country;
- Undermine U.S. research integrity, transparency, or national security interests;
- Require or encourage participants to hide foreign affiliations, appointments, or support;

- Create conflicts with a participant's obligations to a U.S. research institution or federal funding agency.

Other Support: All resources made available to a researcher in support of or related to research endeavors, regardless of whether the resources have monetary value and regardless of whether they are provided through WCM or another organization.

Principal Investigator (PI): The individual ultimately responsible for the scientific, ethical, regulatory, administrative, and financial conduct of a research project. The PI is responsible for the overall management and oversight of the research; supervision of research personnel; compliance with applicable institutional policies, sponsor requirements, and federal, state, and local regulations; and ensuring the research is conducted in accordance with approved protocols and applicable standards for the protection of human participants and/or the humane care and use of animals. This includes research conducted at one or more research sites.

Research Security Training: Federally mandated training via the CITI module that must be completed on an annual basis. The training ensures awareness of current federal requirements, best practices in safeguarding research integrity, and compliance with applicable regulations.

Workforce Members: Faculty; Non-Faculty Academics; Staff; Students; Volunteers; and other persons whose conduct, in the performance of work for WCM, is under the direction and control of WCM, whether or not they are paid by WCM.

Procedure

1. **Who Must Disclose:** Principal Investigators, Co-Investigators, Key Personnel, and any individual identified by a sponsor as requiring Other Support disclosure.
2. **When to Disclose:** At proposal submission when required; during Just-in-Time processes; prior to award issuance; within annual or interim progress reports; and immediately upon identification of a previously omitted item.
3. **What Must Be Disclosed:** Active and pending research support, including: federally and non-federally sponsored projects; internal institutional support designated for research that do not qualify as gifts or start-up packages internal research support not excluded by sponsor guidance; foreign appointments and affiliations; visiting scientist appointments; and In-Kind Contributions meeting sponsor thresholds. **Participation in Malign Foreign Talent Recruitment Programs (MFTRP) is expressly prohibited by the federal government and WCM.**
4. **Submission Process:** Investigators must prepare sponsor-required forms using approved systems such as SciENCv or PowerApps when applicable and or provide documentation to the Office of Sponsored Research Administration (OSRA) or Grants and Contracts Office, WCM-Q for institutional review
5. **Effort Review:** Total active and proposed commitments must be evaluated for overlap. Where effort exceeds allowable thresholds or represents potential overlap, investigators must include explanations and management plans required by the sponsor.
6. **Institutional Review:** OSRA will review disclosures for completeness, consistency, and compliance before sponsor submission. Identified deficiencies must be corrected prior to submission wherever feasible. For WCM-Q, the grants and contracts office reviews the disclosures submitted by Faculty and Research Operations (RAOps) to ensure compliance before submitting to the sponsor.

Compliance with this Policy

Failure to comply with this policy may result in delayed proposal submission, delayed award acceptance, additional monitoring, corrective action requirements, sponsor notification, disciplinary action, or other institutional responses. Knowingly providing false, misleading, or incomplete information may expose individuals and the institution to administrative, civil, or criminal penalties. All Key Personnel participating in federally sponsored research must complete annual RST and any related institutional education requirements. Participating in MFTRP is expressly prohibited by the federal government and by WCM. Violations may result in institutional corrective action or disciplinary action, notification to sponsors or government agencies, loss of eligibility to participate in sponsored research, and other actions deemed appropriate by WCM.

All WCM Workforce Members are responsible for adhering to this policy. Failure to comply will be evaluated on a case-by-case basis and could lead to Corrective Action, up to and including termination, consistent with other relevant WCM and University Policies. Instances of non-compliance that potentially involve a lapse of professionalism may lead to engagement of the Office of Professionalism for evaluation and intervention. Failure to cooperate with a compliance investigation, knowingly providing false or misleading information, interfering with an investigation, or engaging in retaliation or intimidation may also result in corrective or disciplinary action.

Contact Information

Office of Sponsored Research Administration (OSRA)

- Email: grantsandcontracts@med.cornell.edu

For WCM-Q: Grants and Contracts: grantsoffice@qatar-med.cornell.edu

References

- [2 CFR Part 200 \(Uniform Guidance\)](#)
- [NIH Other Support Requirements](#)
- [WCM Research Security Requirements](#)
- [OSRA Standard Operating Procedure for Sponsor Pre-Funding "Just in Time" Requests](#)
- [OSRA Standard Operating Procedure for Submitting a Progress Report for OSRA Review](#)
- WCM Policy GRC-220.03 – Effort Reporting
- [University Policy 1.7 Research Related Conflicts of Interest](#)
- WCM COI-220.00 - Conflict of Interest Procedures

Policy Approval

This policy was reviewed and approved by the WCM-Executive Policy Review Group on September 15, 2026.

Version History

Date	Author	Revisions
09/15/2026	Office of Sponsored Research Administration	Original date of issue.

Appendix

N/A