



SEATTLE INSTITUTE FOR BIOMEDICAL  
AND CLINICAL RESEARCH

# Common Forms Current Pending (Other) Support Disclosure Training

January 2026

# Key Learning Objectives

## This Training:

1. Provides an overview of requirements for **what to disclose** in the Common Form Current and Pending (Other) Support (“**CPOS**”) document

## Key Learning Objectives:

1. Understand who must complete the training, how often it is required, and how to submit proof of completion
2. Delineate required current and pending (other) support disclosures
3. Understand the responsibilities and obligations that each individual accepts when signing to certify their support document

# Training Completion Details

- **Who:** Individuals identified as Senior/Key Personnel, or otherwise required to submit CPOS, for federally-funded research projects where the federal funder has a CPOS training requirement
- **When:** One time only currently
  - Required before CPOS submission to a federal funder that has a CPOS training requirement
- **How:**
  - Review the training carefully
  - Ask any questions by contacting [spo@sibcr.org](mailto:spo@sibcr.org) or your SIBCR grant administrator
  - Sign the final page and return it to [spo@sibcr.org](mailto:spo@sibcr.org)

# Current and Pending (Other) Support

- Current and Pending (Other) Support (“**CPOS**”) refers to the federal-wide Common Forms developed in response to [NSPM-33](#)
  - Individuals must generate and personally certify their CPOS document **within** the [SciENcv online system](#)
- Senior/Key Personnel, and others as required, submit CPOS before award, with annual progress reports, and upon request
- NIH implemented the CPOS Common Form via Notice [NOT-OD-26-018](#)
  - **Implements substantive changes from former NIH Other Support format**
  - NIH’s [CPOS Instructions](#):
    - Provide step-by-step instructions for each data field
    - Include indicating if support falls under VA vs. University appointment



New!



New!

# CPOS Definition

**All resources** made available, or expected to be made available, to you in support of your research and development efforts

- regardless of whether the source is foreign or domestic
- regardless of whether the resource is made available through the entity applying for an award (such as SIBCR) or directly to the individual (you)
- regardless of whether the resource has monetary value

This includes in-kind contributions requiring a commitment of time and directly supporting your research efforts, such as office or laboratory space, equipment, supplies, employees, or students or visiting researchers

# Types of Support: All Resources

Not just  
grants and  
subawards!

- All active projects or projects with ongoing obligations (“Current”)
- Any proposal being considered for funding (“Pending”)
- Include the project/proposal for which the CPOS is being submitted
- Certain in-kind contributions, consulting, and other activities associated with time commitments
- Any participation in programs sponsored by foreign governments
  - Additional documentation will be required
- Direct or indirect support by a foreign government-sponsored talent recruitment program
- ***NIH’s CPOS instructions require dual VA/University appointees to indicate which appointment the resource is affiliated with, VA or University***

New!

# Types of Support: Funding Support

- All funding sources providing support of, or related to, your research such as:
  - Grants
  - Subawards
  - Contracts/CRADAs
  - Internal funding for specific projects (e.g. VA Seed grants)
  - Start-up packages from an outside (non-SIBCR) entity such as VA or UW
- Include regardless of whether support is provided through SIBCR, another organization, or directly to you as an individual
- Include projects with any time commitment whether effort is paid or unpaid
- For subawards, include overall grant number and source only; provide all other information about subaward such as total costs, effort, etc.

# Types of Support: In-Kind Contributions

- These are non-cash contributions provided by an external entity that directly support your research efforts
- Disclose all in-kind contributions with an estimated dollar value of \$5,000 or more **and a required time commitment**
- Include contributions provided through another external entity or directly to you as an individual
- Examples of in-kind contributions if not provided to you by VA or SIBCR:
  - Office or laboratory space
  - Equipment or real property
  - Goods and services
  - Supplies or other expendable property
  - Research materials or data/datasets that are not freely available
  - Employees or students whose work benefits your research



New!

# Types of Support: Other Things to Disclose

- Postdoctoral scholars, students, or visiting scholars who are supported by an external entity whose research activities will benefit your research and development efforts
  - For example, students or post-docs on University of Washington (UW) training grants may be In-Kind Contribution support
- Travel reimbursed or paid for by an external entity to perform research activities with an associated time commitment
  - *Note: Externally sponsored/reimbursed travel may also need to be disclosed separately under SIBCR's Financial Conflict of Interest (FCOI) policy*
- Start-up company based on licensed IP
- External Consulting – see next slide

# Types of Support: External Consulting

Some  
Consulting  
needs to be  
disclosed on  
CPOS

- Disclose external consulting activity as CPOS when:
  - You will perform research as part of the consulting activity
  - Even if not performing research, the consulting relates to your research portfolio and/or may impact your funding, time commitments, or scientific integrity
  - It is performed outside of your VA appointment
  - Consulting contract requires concealing or withholding ties to entity



*Please note regarding external consulting activities:*

- *Separate VA requirements exist for outside work and/or VA Conflict of Interest (COI) review – it is your responsibility to understand and obtain appropriate review or authorization from VA*
- *Separate disclosures for external consulting compensation may be required by SIBCR's Financial Conflict of Interest (FCOI) policy as well*

# What is not disclosed on CPOS?

- Completed support and completed in-kind contributions
- In-kind contributions under \$5,000 and **without a time commitment**
- Shared equipment and core facilities available broadly (list in Facilities & Resources instead)
- Unrestricted gifts or prizes
  - Gifts have no expectation of anything in return
  - If there is an associated time commitment, specific research activity, etc., it is not a gift and must be reported
- Travel reimbursed or paid for by an external entity to attend a non-research conference or workshop
  - *Note: Externally sponsored/reimbursed travel may also need to be disclosed separately under SIBCR's Financial Conflict of Interest (FCOI) policy*

# What is not disclosed on CPOS?

- Internal consultation performed as part of VA job duties without committed effort
- External consulting that does not involving performing research and is unrelated to your research with no ability to impact to funding, effort commitments, or scientific integrity
- Start-up packages from the proposing organization (SIBCR)
- Mentoring unrelated to research activities, if there are no research activities performed by the mentee and no associated time commitment by the mentor
  - If mentee is performing research activities to benefit mentor's research endeavors, report as In-Kind Contribution
- Academic teaching salary support and teaching commitments
- Honoraria unrelated to research activities or co-authorship

# When in Doubt, Disclose!

- Transparency is the goal: Over-disclosure is better than under-disclosure
- Consult with funder instructions and resources and SIBCR grant administrators for guidance
- Remember, any activity that requires the following is a **red** flag:
  - Concealing or withholding, confidential financial or other ties with an entity
  - Unauthorized sharing of information, technology, materials, products, other nonpublic information
  - Direct or indirect support by a Malign Foreign Talent Recruitment Program
  - Alert VA and SIBCR if you are approached



# Responsibilities and Obligations

- Your certification of the CPOS document accepts your responsibility for its accuracy and completeness

I certify that the information provided is current, accurate, and complete. This includes but is not limited to current, pending, and other support (both foreign and domestic) as defined in 42 U.S.C. § 6605.

I also certify that, at the time of submission, I am not a party in a [malign foreign talent recruitment program](#).



Misrepresentations and/or omissions may be subject to prosecution and liability pursuant to, but not limited to, 18 U.S.C. §§ 287, 1001, 1031 and 31 U.S.C. §§ 3729-3733 and 3802.

- Follow current funding agency instructions to prepare CPOS
- Correct erroneous submissions within 30 days or ASAP
- SIBCR only has visibility to SIBCR-held resources
  - You must validate VA or UW-based Support from VA or UW sources
- Research Security Training certification may also be required

# Last Step

- By signing below, I certify that I have read and completed the SIBCR CPOS training
- I further attest that I will comply with SIBCR's Current and Pending (Other) Support Policy and funder/sponsor instructions and guidance regarding these disclosures

Investigator Signature \_\_\_\_\_

Print Name \_\_\_\_\_ Date \_\_\_\_\_

*Please print final page and email to [spo@sibcr.org](mailto:spo@sibcr.org).*