

**Document Type:** Policy

**Retrieval Number:** 11,031

**Subject:** Other Support Disclosure Training Requirements

**ORGS Office:** Office of Sponsored Programs

**CMU Partner Office (if applicable):** N/A

**Originator & Original Date:** Sarah Hall 9/29/2025

**Annual Final Approval:** Executive Director for Research and Innovation

**Applicable Area:** Pre-Award and Post Award

**Revision Date(s) and Name of Editor:**

**Time of Annual/Biennial Review:** annually in September

**Date(s) of Review(s):**

**Published Location:** K drive and website

**Purpose:**

To outline the requirements for other support disclosure training mandated by the National Institutes of Health (NIH) in notice [NOT-OD-25-133](#) as implemented by Central Michigan University (CMU).

**Definitions:**

- **Senior/Key Personnel:** NIH defines this as, “The PD/PI and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they receive salaries or compensation under the grant. Typically, these individuals have doctoral or other professional degrees, although individuals at the masters or baccalaureate level may be considered senior/key personnel if their involvement meets this definition. Consultants and those with a postdoctoral role also may be considered senior/key personnel if they meet this definition. Senior/key personnel must devote measurable effort to the project whether or not salaries or compensation are requested. "Zero percent" effort or "as needed" are not acceptable levels of involvement for those designated as [Senior/Key Personnel](#).”

**General Background Information:**

NIH Guide Notice NOT-OD-25-133 announced a new policy that requires NIH recipients to provide training to all faculty and researchers identified as Senior/Key Personnel on the requirement to disclose all research activities and affiliations (active and pending) in Other Support. The new requirement to train researchers to comply with other support disclosure requirements adds to the current policy (see NIH Grants Policy Statement (GPS), Section 2.5.1 “Just-in-Time Procedures”) in order to provide a comprehensive plan in the area of disclosure requirements for recipients.

**Narrative/Details:**

1. Beginning October 1, 2025, the Office of Sponsored Programs (OSP) will require that all Senior/Key Personnel on NIH applications have completed training before Other Support documents will be submitted to the NIH.

2. In order to fulfill this requirement, OSP will require that all Senior/Key Personnel complete the Research Security Advanced Refresher course available through CITI.
3. Training completion will be tracked in Cayuse.