



CERTIFICATION

Subrecipient Legal Name:

The subrecipient confirms that as of October 1, 2025, it has adopted a written and enforced institutional policy on requirements for the disclosure of other support to ensure that Senior Key personnel fully understand their responsibility to disclose all resources made available to the research in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are based at the researcher identifies for the current proposal/grant.

This certification is required, pursuant to NIH Notice [NOT-OD-25-133](#).

Requirement

NIH requires 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 (see Other Support form). 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. This update will be included in the FY2026 version of the NIH GPS as part of NIH’s standard processes.

Effective October 1, 2025, recipients must implement trainings, in addition to maintaining a written and enforced policy, on requirements for the disclosure of other support to ensure Senior/Key Personnel fully understand their responsibility to disclose all resources made available to the researcher in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are based at the institution the researcher identifies for the current grant.

AOR Signature

Date

AOR Name & Title

AOR Email