Faculty Disclosures for NIH and NSF
HSPH Research Administrator Training

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Agenda

Overview

- Changes to Federal Requirements

Business Process Changes

- Walkthrough Other Support Guide
- JIT and RPPR
- Foreign Agreements

Resources

Q&A

NIH and NSF: Common Changes

- Expect disclosure of all resources available in support of research, including in-kind support
- Complete disclosure of all affiliations and appointments in Biosketch
- Notification, within 30 days, to NIH or NSF for any disclosures previously not reported
- Use of SciENcv encouraged for Biosketch and, in the future, for Other Support/Current and Pending

Changes/Clarifications Specific to NIH (May 2021)

BioSketch

- Section A: may include details on ongoing and completed research projects from the past three years in their Personal Statement
- Section B: renamed to “Positions, **Scientific** Appointments and Honors” rather than “Positions, Appointments and Honors”
- Section D: removed from the non-Fellowship Biosketch; removed “Research Support” from the Fellowship Biosketch

Other Support

- **New**: Notification within 30 days of any previously undisclosed Other Support
- **Reminder**: All individuals designated as Senior/Key Personnel must disclose Other Support with the exception of:
    - Program directors, training faculty, and other individuals involved in the oversight of training grants and,
    - Other Significant Contributors
- **Reminder**: Disclosure of ALL RESEARCH RELATED endeavors
- **Clarification**: Other Support includes consulting when the conduct of research is part of the consulting activities.

Changes Specific to NIH (January 25, 2022)

Other Support

- New Other Support form required for both JIT and RPPR submissions
- Form includes section for In-Kind Contributions and an attestation with e-signature of the reporting individual, certifying to the completeness and accuracy of the submitted information

Foreign Contracts and Agreements

- Agreements specific to the individual's appointments, affiliations, and/or employment with a foreign institution must be appended to Other Support as supporting documentation
- Must also include an unredacted, translated version of the agreement if the original is not in English

What Should Be Included in NIH Other Support?

Includes

- All resources and other support, both domestic and foreign, for ongoing research projects, including those conducted at a different institution
- In-kind contributions from domestic and foreign institutions or governments that support research activities (e.g., office/lab space, equipment, supplies)
- Post-docs, students, or visiting scholars (a) supported by an external entity or institution **AND** , (b) working on the reporting individual's research
- Income, salary, consulting fees, and honoraria in support of the individual's research endeavors
- Participation in foreign talent or similar-type programs

Excludes

- Training awards
- Prizes or Gifts
- Start-up support from the US-based institution (Harvard)

Other Support Demo

Walkthrough Other Support Drafting Guide Template

Other Support Guide Template

NIH Proposal Submission

Role	Task
Key Personnel	Complete Biosketch following new guidelines for sections A, B and D
GM	Review for adherence to NIH requirements and submit to Central Office for Review
Central Office Reviewer	Review, sign off as AOR and submit to NIH via ASSIST

Foreign Agreements Review (NIH ONLY)

Role	Task
Key Personnel	In GMAS, upload **(or provide a copy to your GM to upload)** all relevant foreign agreements to their Person Profile (see Outside Foreign Contracts and Agreements). Remember to upload the original and an unredacted, translated copy
School Central Reviewer (SCR)	When the SCR receives an email that a new agreement has been uploaded, the SCR will review the agreement and change the status to: • **Review in process** indicates that review has started. • **Reviewed: OK to submit** indicates that review is complete, and the agreement should be attached to Other Support prior to submission to NIH • **Reviewed: Not for submission** indicates that review is complete, but the document should not be submitted (usually because it does not meet the federal standard for disclosure)

JIT Request including Other Support (NIH Only)

Role	Task
Central Office	Forward JIT email request from NIH GMS to PI, Department Grants Manager, and Central Reviewer (AOR)
Key Personnel	Review GMAS "Other support and activities" report; provide all sources of research support (from GMAS report and elsewhere) to GM to update Other Support document
GM	Update Other Support and reviews to ensure it meets NIH formatting and content requirements; enter JIT request* in GMAS and upload Other Support for all key personnel

*Just-In-Time Request Job Aid

JIT Review (NIH ONLY)

Role	Task
Central Office	Review JIT request in GMAS, coordinate any changes with GM. Once review is complete, put together a complete package including supporting documentation for foreign agreements to be submitted. Request GM to obtain e-signatures on all Other Support.
Key Personnel	Electronically sign the Other Support attesting to completeness and accuracy
GM	Works with central office reviewer to finalize JIT request by updating any documents that need changes, obtaining e-signatures on Other Support for all Key Personnel and upload a finalized signed package in GMAS for the JIT request

JIT Submission (NIH Only)

Role	Task
Central Office	• Flatten the final, signed version of documents to be submitted to NIH in the JIT request. • Upload the flattened version to eRA Commons JIT module • Enter IACUC/IRB dates (if required) • Submit the JIT in eRA Commons

*Do not delete the unflattened version from the GMAS JIT Request

All Questions Subs…

Harvard is the subrecipient when the prime award is NIH:

- For any proposal on which Harvard is a subrecipient and the prime sponsor is NIH, if a JIT request comes from the pass-through entity, the GM will need to create a JIT request in GMAS and follow the same process as if it were our own award.

Harvard is issuing a sub to another organization and the prime award is NIH

- Harvard expects the subrecipient organization to have reviewed and obtained appropriate institutional and Key Personnel signature on any Other Support documentation submitted to Harvard in fulfillment of the NIH JIT request
- Ensure that any documents received from the subrecipient are unlocked/unsecured prior to submission to Central Reviewer as locked documents cannot be flattened for submission in eRA Commons.
- Harvard's preference is to receive copies of Other Support from the subrecipient that have already been flattened; we do not need to retain the unflattened copy."

SIGNATURE

I, PD/PI or other senior/key personnel, certify that the statements herein are true, complete and accurate to the best of my knowledge, and accept the obligation to comply with Public Health Services terms and conditions if a grant is awarded as a result of this application. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties.

Signature & Date:_____

The reporting PI/key personnel must sign their Other Support after all required documentation has been attached, and after it's been reviewed by their school's submitting office, prior to submission to NIH.

***IMPORTANT NOTE**: Signature authority cannot be delegated to anyone, including Grant Managers and Administrators.*

Key Takeaways

All NIH and NSF PI's and Senior/Key Personnel were required to complete the HTP module and acknowledge they have been advised of the regulatory changes affecting disclosures.

The Key responsibility of the Grant Manager is to (1) Create JIT/Continuation request in GMAS (2) Assist PI/Key Personnel with completing their Other Support and Biosketch 3) upload documents to JIT/Continuation request and assist PI with upload, as needed, of any foreign agreements for review (4) facilitate obtaining signatures for Key Personnel

The PI/Key Personnel is required to electronically sign their own Other Support attesting to the completeness and accuracy of the information on the document.

The PI/Key Personnel is responsible for providing all research support information to their grants administrator or updating their own Other Support/Current & Pending Support. The consolidated report in GMAS can assist with this effort but does not take the place of the reporting individual's complete disclosure of all resources and support, some of which will not appear on the GMAS report.

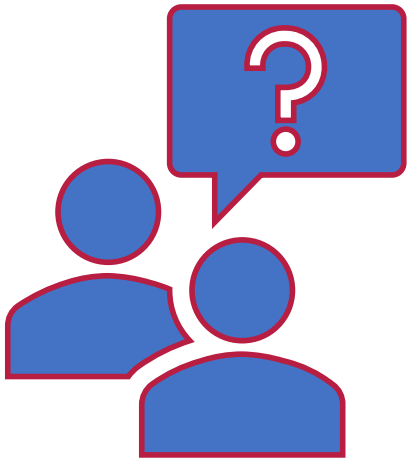
Each school has a school reviewer to help faculty determine if an agreement needs to be disclosed.

Available Resources

OVPR Website

HCSRA Faculty Disclosure Guidance

Note: As resources become available on the OVPR website, they are also being referenced on the HCSRA Faculty Page.



Contacts

Foreign Contract and Agreement Review Contact by School		
School	**Main Contact**	**Email address**
SPH	Angela Brazeau	oscontracts@hsph.harvard.edu

General Questions about Biosketch, Other Support And Current & Pending		
School	**Main Contact**	**Email address**
SPH	Melissa Francis	mjfrancis@hsph.harvard.edu

Q & A