

## Procedure: Outside Activity and Interest Reporting (OAIR) Approvals

### Reason for the Procedure

This procedure helps to ensure compliance with [NIH fCOI guidelines](#) and the [University's OAIR policy](#) which have as goals to promote objectivity in research. The Outside Activity and Interest Reporting (OAIR) system where individuals disclose related financial interests and activity along with the GMAS system play an important role in tracking OAIR approvals and ensuring all requirements are met before a proposal can be submitted or an award can be setup. This process focuses on the various steps that occur to confirm that OAIR approvals are in the correct status before moving to proposal submission and award set up.

### Related Documents

[University's OAIR policy](#)

[GMAS/OAIR Integration Job Aid](#)

[School-specific Implementation](#)

### Questions? Contact:

Your SRA or Angela Brazeau,  
[abrazeau@hsph.harvard.edu](mailto:abrazeau@hsph.harvard.edu)

### Key Information

*PHS+* refers to all Public Health Services (PHS) agencies (NIH, CDC, HRSA, etc.) plus NSF and others that use PHS regulations including American Heart Association, American Cancer Society, Arthritis Foundation, Susan G. Komen Foundation and Alliance for Lupus Research. For a complete list, visit this [link](#).

*Investigator* is the project director or principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of proposed or funded research by PHS+, which may include, for example, collaborators or consultants. Note that in GMAS, only the PI is automatically an Investigator. **You can be a key person on the project but not be an Investigator (ex. sub PI).** The PI should determine who is an Investigator.

Requirements at Proposal Stage: Each Investigator who is planning to participate in PHS+ funded research *must* have an OAIR disclosure on file that is no less than one year old at the time of proposal submission. A proposal cannot be submitted without a disclosure on file.

Requirements at Award Stage (At Risk and New & Competing Renewals): Prior to award setup for a PHS+ sponsored research project, Investigators must complete a research certification in OAIR. The school's OAIR Reviewer Contact must then review the disclosure against the project for any perceived conflicts of interest.













Note: OAIR approvals will generate in GMAS on non PHS+ sponsored projects for the PI. OAIR will send back a status of "Done" for these approvals in GMAS based on the policy rules set up in the OAIR system.

## Process Steps

Step	Role	Task/Activity
<b>PROPOSAL STAGE</b>		
1	PI	Identifies funding opportunity and determines which personnel are Investigators (responsible for the design, conduct or reporting of the research).
2	GM	Enters proposal into GMAS and populates research team including Investigators. PI or mentor (if mentor is a PI) are automatically Investigators. Any additional Investigators identified by the PI should be marked appropriately.
4	Automated (no action)	GMAS generates an OAIR approval for all Investigators. This GMAS approval will be in "Pending" status.
5	Automated (no action)	<p><b>No disclosure on file in OAIR:</b> OAIR sends an email to Investigators requesting that they complete their disclosure. This email is sent only to Investigators on PHS+ funded projects.</p> <p><b>Disclosure on file:</b> OAIR sends an email to Investigators requesting that they update their disclosure. This email is sent only to Investigators on PHS+-funded projects.</p>
6	Investigators	Investigators complete or update disclosure in OAIR ( <a href="https://oir.harvard.edu/">https://oir.harvard.edu/</a> ).
7	GM	<p>If PI deems that a non-Harvard personnel should be listed as an Investigator on a subcontract (i.e. sub PI), confirm in FDP Clearinghouse (<a href="https://fdpclearinghouse.org/">https://fdpclearinghouse.org/</a>) that subcontractor has their own OAIR (or conflict of interest) policy. Do not include them on the research team in GMAS.</p> <p>If PI deems that subs or other significant contributors (OSCs) without their own policy should be listed as an Investigator, please have that individual follow steps to complete a paper form submission (<a href="https://hcsra.sph.harvard.edu/files/hcsra/files/oir_smartform_-_non-harvard_certification.docx">https://hcsra.sph.harvard.edu/files/hcsra/files/oir_smartform_-_non-harvard_certification.docx</a>) and contact Angela Brazeau if a review is needed at award stage.</p>
8	GM	Confirms all Investigators have their GMAS OAIR approval in "Done" status confirming that their disclosure requirement is fulfilled.
9	Submitting office	Review to ensure all OAIR approvals are in "Done" status. Note: non-Harvard Investigators may have an OAIR approval in a status other than "Done." COI reviewer should add comments to indicate approval in GMAS.
10	Submitting office	Submits/signs proposal.
<b>AWARD STAGE (At Risk, New/Initial and Competing Renewals)</b>		
11	Submitting office	Receives notice from sponsor in response to request for funding. If funded, logs notice of award.
12	Automated (no action)	GM receives a GMAS to-do and e-mail when the award notice is logged notifying them that the research team needs to be confirmed.

13	GM	Verifies research team in GMAS accurately reflects Investigators on project. Confirm research team via request home screen in GMAS using <Confirm research team> button.
14	Automated (no action)	Notification sent by OAIR to Investigators to complete a research certification.
15	Investigator(s)	Completes research certification.
16	Automated (no action)	GMAS updated with OAIR approval statuses. OAIR sends e-mail to COI reviewer with approvals to be reviewed.
17	Designated Institutional Official (COI Reviewer)	Completes review(s). If no conflict is determined, approval moves to “Done” in GMAS. If conflict is determined, discusses with Investigator ways to eliminate, reduce or manage conflict. Notifies sponsor of conflict and actions taken to reduce, eliminate, or manage. Once management plan is in place, approval then moves to “Done” in GMAS.
18	Submitting office	Reviews OAIR approval(s) prior to award setup to ensure they are in “done” status or “withdrawn”.
19	Submitting office	Proceeds to account setup.
20	Submitting office	For subcontractors that do not have their own OAIR or COI policy, ensure subagreement contains appropriate language and ensure subrecipient Investigators have completed a disclosure.
<b>POST AWARD (Updating research team, supplements and continuations)</b>		
21	GM	Adding new Investigators to the research team on Continuations or Supplements will generate approvals for those new Investigators.
22	GM	During the course of the project, updates GMAS research team with any new <i>Investigators</i> that join project and ensures research certifications are complete and reviewed prior to commencement of work on the project. Research team is edited from the Segment Home <Research team> section.

## OAIR Approval Statuses in GMAS

Status	Description	OK to submit proposal?	OK to set up award?
Pending	Project and Investigator information has not yet been sent to OAIR		
Processing in OAIR	The research certification is being processed on the OAIR side and is not yet in a state where a proposal or award can move forward.		
Done	The research certification is in a state in OAIR where a proposal or award can move forward.		
Pending update	The Research Certification requires additional review based on a major project milestone (award or at-risk) and project and Investigator information has not yet been resent to OAIR.		
Withdrawn	The Investigator has been removed or updated to a non-Investigator from the segment research team.		
Withdrawn from OAIR	The OAIR approval has been withdrawn on the OAIR side. <b>When the approval is in this status a follow-up should happen with the local OAIR representative.</b>		

## Notification Language

**Action Required: Please update and submit an Outside Activity and Interest Report for your research project**

**Project:** [Project ID]  
**Title:** [Project Name]

In order to participate as an Investigator in the above-referenced research project, you are required to ensure that your outside professional activities and financial interest report is up-to-date, add information and make changes if necessary and answer questions about potential overlap between any of those activities/interests and the research project. **This must be completed to proceed with any further sponsored award related actions. .**

**To complete this report:**

- Click on the link above
- Choose “Edit Disclosures” (on the left)
- Review, update, and confirm information in the form
- Finalize and submit your disclosure certification

## Related Links

### General

eNews (to be published 1/14/21): <https://admin-enews.eureka.harvard.edu/>

### GMAS

GMAS Job Aid: <https://gmas.fss.harvard.edu/outside-activity-and-interest-reporting-oair-and-gmas-integration>

GMAS Release Overview: <https://gmas.fss.harvard.edu/news/gmas-release-156>

GMAS blog: <https://gmas.fss.harvard.edu/blog>

GMAS Help: [contactgmas@harvard.edu](mailto:contactgmas@harvard.edu)

### **OVPR:**

Policy and definitions: <https://vpr.harvard.edu/OAIR>

### **OAIR**

OAIR Fact Sheet: [https://ras.fss.harvard.edu/files/ras/files/oir\\_project\\_-\\_fact\\_sheet.pdf](https://ras.fss.harvard.edu/files/ras/files/oir_project_-_fact_sheet.pdf)

Investigators without HUID: [https://hcsra.sph.harvard.edu/files/hcsra/files/oir\\_smartform\\_-\\_non-harvard\\_certification.docx](https://hcsra.sph.harvard.edu/files/hcsra/files/oir_smartform_-_non-harvard_certification.docx)

OAIR Support Staff Basics: [https://ras.fss.harvard.edu/files/ras/files/oir\\_guidance\\_-\\_support\\_staff\\_basics.pdf](https://ras.fss.harvard.edu/files/ras/files/oir_guidance_-_support_staff_basics.pdf)

OAIR Job Aids: <https://ras.fss.harvard.edu/oir-job-aids>

OAIR Info Sessions (for OAIR users): <https://ras.fss.harvard.edu/calendar>

OAIR Help: [oirhelp@harvard.edu](mailto:oirhelp@harvard.edu)

## **Revision history**

- September 9, 2021: Updated broken links
- January 14, 2021: First publication