



Faculty Disclosures for NIH and NSF Grant Manager Training

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Objectives



Reiterate the changing landscape for federal agencies and impacts to our researchers (this includes Faculty and Key Personnel)

Office of Vice Provost for Research



Define your role in the overall process and the role of researchers



Identify where to go to gather additional information for you and advise researchers on resources available

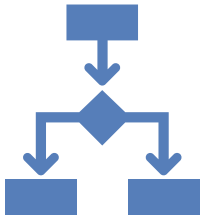


Agenda



Overview

- Changes to Federal Requirements
- Specific Agency Guidance (NIH and NSF)
- Roles and Responsibilities (high level)



Business Process Changes

- JIT and RPPR
- Foreign Agreements



Systems

- GMAS Enhancements and Demo



Resources

- Job Aids
- Process Documentation



Federal Regulation Changes: National Defense Authorization Act and President's Memorandum

[NDAA](#)

Section 223

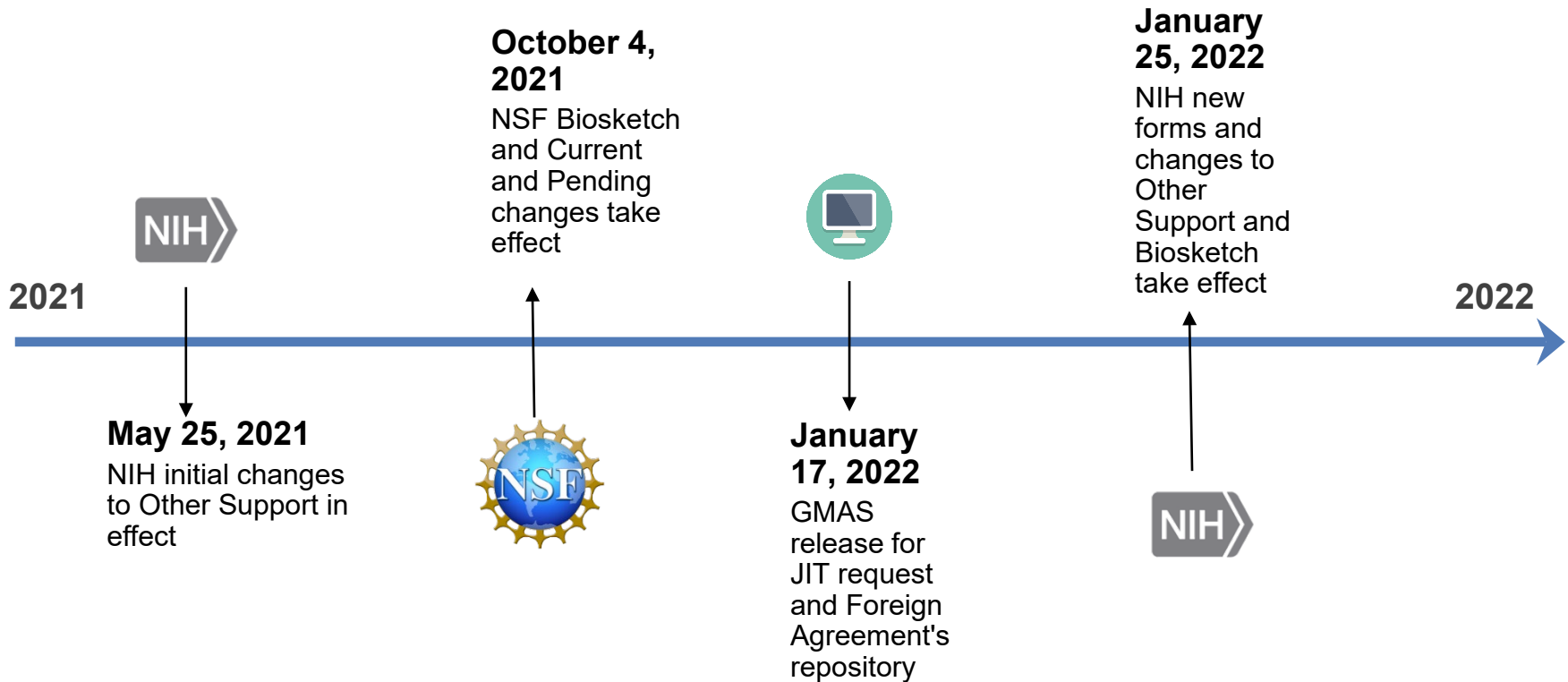
- Disclose the amount, type and source of all current and pending research support received by, or expected to be received by, the individual as of the time of the disclosure
- Certify that the disclosure is current, accurate, and complete
- **The entity (organization) certify that all key personnel employed by the organization have been made aware of the requirements above.**

[NSPM 33](#)

- Addresses why research security and integrity is important and outlines their key elements
- Establishes federal department and agency roles and responsibilities related to research security
- **Contains requirements such as:**
 - Disclosure of key information to federal agencies
 - Establishment of a research security program for institutions receiving >50M in federal funding



Timeline of Changes





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 Specific to NSF (effective October 4, 2021)

BioSketch

- Increased page limit for the biographical sketch from two to three pages

Current and Pending

- Table entitled [*NSF Pre-award and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending Support*](#) identifies where pre- and post-award current and pending support disclosure information must be provided. Proposers and awardees may begin using this table immediately
- Information on objectives and overlap with other projects is required to help NSF and reviewers assess overlap/duplication



NSF Table: PreAward and PostAward Disclosures

◆ = for new support only

♦ = If undisclosed at the time of proposal submission

Type of Activity	Biographical Sketch	Current & Pending Support	Facilities, Equipment & Other Resources	Project Reports	Post-Award Information Term & Condition	Disclosure Not Required
Undergraduate, graduate, and postdoctoral training, including location, major/area and degree and year	✓					
Academic, professional ⁴ or institutional appointments, whether or not remuneration is received, and, whether full-time, part-time, or voluntary	✓					
All projects (including this project) currently under consideration from whatever source, and all ongoing projects, irrespective of whether support is provided through the proposing organization, another organization or <i>directly</i> to the individual		✓		✓*	✓♦	



Changes and 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.



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)



Categories of Other Support

Projects/Proposals

- List all active and pending sponsored projects
- Effort, in person months (calendar/academic/summer) must be included for each project. NIH does not distinguish between activities that occur as part of a person's institutional effort and those that are "outside" activities
- For subprojects, recipients should provide the project number, PD/PI, and source for the overall project. Provide all other information for the subproject only

In-Kind Contributions:

- At Proposal Submission: if the In-Kind resource is intended for use on the project being proposed, the information must be included on the Facilities and Resources or Equipment section
- At JIT/RPPR include **all** In-Kind contributions on Other Support



Categories of Other Support

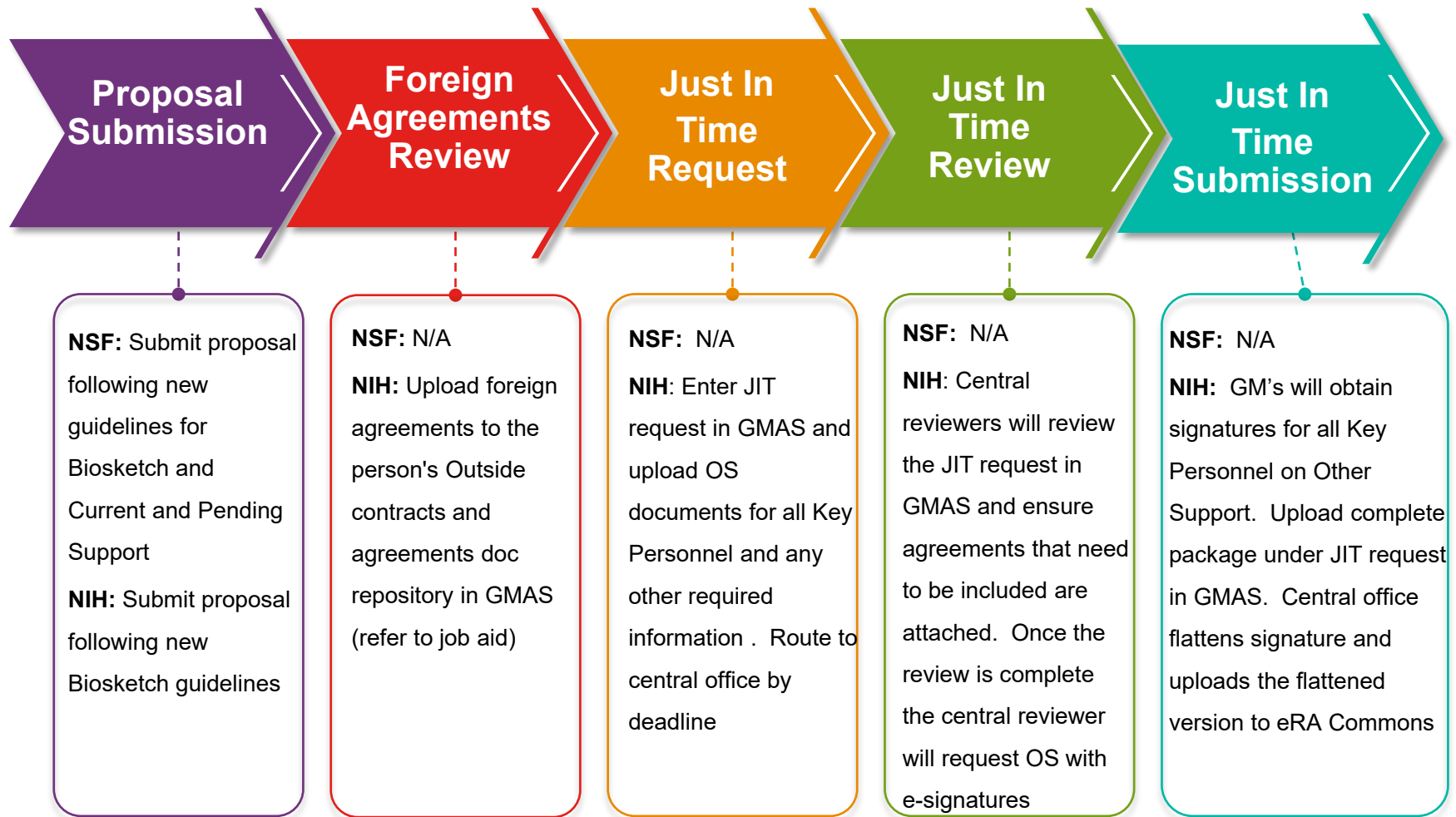
Other Resources/Support:

- List any outside employment or other support/resources that are not projects or in-kind contributions
- Include any financial resources in support of your research endeavors
- Some examples include, but are not limited to:
 - Research consulting activities where the reporting individual is conducting research. Provide estimate of the amount paid, rather than time and effort in calendar months.
 - Employment at an outside institution (e.g., Broad, HHMI Investigators)
 - Start-up funds from an institution other than Harvard University
 - Private equity financing for NIH SBIR/STTR program or similar (e.g., Mass Life Sciences)
 - Travel/living expense reimbursements

[Harvard Definition of Research](#)



High-Level Process Overview



Reminder: Both NIH and NSF require notification, within 30 days, of any previously undisclosed other support.



NSF Proposal Submission



Role	Task
Key Personnel	<ul style="list-style-type: none">• Complete Biosketch following new guidelines (increased page limit)• Complete Current and Pending to include all research related endeavors (refer to prior slides and link to NSF Table)
GM	Review for adherence to NSF administrative requirements and submit to Central Office for Review
Central Office Reviewer	Review, sign off as AOR and submit to NSF via FastLane/Research.gov



NIH Proposal Submission



Role	Task
Key Personnel	Complete Biosketch following new guidelines for sections A, B and D
GM	Review for adherence to NIH administrative 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: <ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• Flatten the final, signed version of documents to be submitted to NIH for the JIT request.• Enter IACUC/IRB dates (if required)• Upload the flattened version to eRA Commons JIT module

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



All Questions Subs...

Harvard is the subrecipient when the prime recipient 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 an award directly to Harvard.

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."



GMAS System Enhancements and New Features



Just In Time GMAS Request

New GMAS request type, Just-In-Time (JIT):

- When the JIT email from NIH GMS is received, enter a Just-in-Time GMAS request in the pending segment ([Just-In-Time Request Job Aid](#)).
- Upload Other Support docs for all key personnel and lock and route request for review

Select a request type

Is this a retroactive request? Yes No

Request type (select one)

- Just-in-Time ?
- Continuation ?
- Supplement ?
- Competing renewal ?
- Cost sharing ?
- International collaboration and activities ?
- Research team ?
- Changes to existing segment ?
- Internal requests ?

Cancel Create request



GMAS Just In Time Demo

Just-In-Time Demo



Outside Foreign Contracts and Agreements System Enhancements

- An “Outside foreign contracts and agreements” document repository is available for every person profile in GMAS.
- You can upload unreviewed contracts/agreements to the doc repository
- A notification will go to the appropriate reviewer that a document is pending review.
- The reviewer will update the document category to reflect the review status
- For additional details, refer to [Outside Foreign Contracts and Agreements](#)).

The screenshot shows the Harvard GMAS user profile interface. The top navigation bar includes 'Harvard GMAS', a search bar, and links for 'People', 'Organizations', and 'Links'. The main content area is divided into a left sidebar with navigation options like 'To-dos', 'Portfolio', and 'Clipboard', and a main profile section. The profile section includes 'Person information' (with fields for Salutation, Full name, Suffix, University ID, Active in PeopleSoft, Merged, and GMAS user), 'Job information', 'Email addresses', 'Phone numbers', 'Addresses', 'Degrees', 'Agency credentials', 'Teams', and 'Participation agreement'. At the bottom, a red box highlights the 'Outside foreign contracts and agreements' category, which shows '1 document' and options for 'Upload' and 'Download all'. Below this is a 'Documents' section with '0 documents' and an 'Upload' button.



Foreign Contracts and Agreements Demo



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.

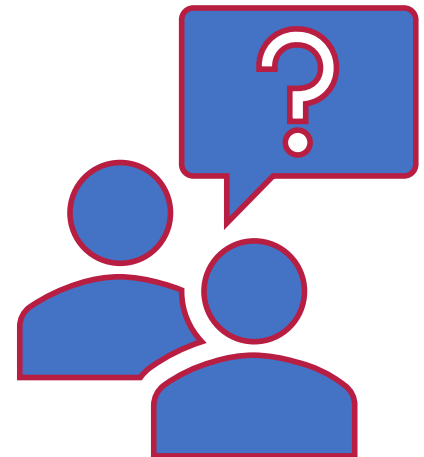


Each school has a school reviewer to help faculty determine if an agreement needs to be disclosed



Resources Available

Resources Available Now on the [OVPR Website](#):





Contacts

Foreign Contract and Agreement Review Contact by School

School	Main Contact	Email address
FAS	Lauren Ferrell	Outsideactivities@fas.harvard.edu
GSE	Tiffany Blackman	tiffany_blackman@harvard.edu
HMS HSDM	Lindsay Monahan	international_collaborations@hms.harvard.edu
SPH	Angela Brazeau	oscontracts@hsph.harvard.edu
HKS	Carrie Kachoria	carrie_kachoria@hks.harvard.edu
SEAS	Lauren Ferrell	Outsideactivities@fas.harvard.edu
HLS	Katie McGrath	kmcgrath@law.harvard.edu
Wyss	Katrin Duevel	katrin.duevel@wyss.harvard.edu
Other Schools	Contact your OSP Rep with Questions	



Contacts

General Questions about Biosketch, Other Support and Current & Pending

School	Main Contact	Email address
FAS	Lauren Ferrell	research@ras.harvard.edu
GSE	Tiffany Blackman	tiffany_blackman@harvard.edu
HMS HSDM	Kelly Evans	Kelly_Evans@hms.harvard.edu
SPH	Melissa Francis	mjfrancis@hsph.harvard.edu
HKS	Carrie Kachoria	carrie_kachoria@hks.harvard.edu
SEAS	Pam Baker-Webber	bakerwebber@fas.harvard.edu
HLS	Katie McGrath	kmcgrath@law.harvard.edu
Other Schools	Contact your OSP Rep with Questions	



Q & A

Questions



Poll Questions

1. As a Grant Manager, my responsibility with completing Other Support or Current and Pending are as follows (click all that apply):
 - a) Download and Review the Outside Support and Activities Report from GMAS
 - b) Complete the new Other Support template with reportable activities designated as such by the Key Personnel
 - c) Facilitate getting Key Personnel signatures

2. As a Grant Manager, my responsibility with foreign contracts and agreements are as follows (click all that apply):
 - a) Review to determine if they need to be disclosed
 - b) Upload, as requested, to the doc repository in GMAS
 - c) Redact information as requested by Key Personnel
 - d) Flatten signatures

Answers highlighted in yellow