



Office of the Vice Provost for Research
Harvard University; 1350 Massachusetts Avenue, Smith Campus Center, Suite 836
Cambridge, MA 02138

Dear colleagues,

You are receiving this message because you are a PI, a Co-PI, or Key Personnel on a National Institutes of Health (NIH) and/or a National Science Foundation (NSF) award or an NIH or NSF funded sub-award, both of which have made changes to their disclosure requirements. This message is intended to make you aware of these changes, their origins, and the guidance and support the University is providing to assist you with providing accurate disclosures.

Background

The National Defense Authorization Act of 2021 (NDAA) includes mandatory requirements for all federal agencies, including NIH and NSF, to enhance and harmonize their disclosure requirements with respect to research support and foreign activities. This includes both changes to the scope of resources and activities that must be disclosed on an individual's Biosketch and Other Support/Current and Pending forms, as well as the requirement to provide copies of certain foreign agreements to the NIH for review. Additional information and resources can be found on the [OVPR website](#). If you are preparing a proposal or progress report that is due after January 25th, you can find the new Other Support template and guidance on the OVPR web site now.

The key provisions of NDAA include:

- PI/Co-PI and Key Personnel listed on the application must disclose all current and pending support and appointments and affiliations on their Biosketches.
- PI/Co-I and Key Personnel must Certify that the information is accurate at the time of the application and update the information at the time of the award and as requested by the agency.
- The Institution must certify that all personnel listed on the application have been made aware of the disclosure requirements.

Key items to note:

- To comply with the new NIH requirements, it will be important for Key Personnel to thoroughly review all resources made available in support of their research and ensure their Other Support forms are complete and accurate in advance of applicable deadlines, and electronically sign their Other Support Form, certifying their accuracy, prior to submission.
- The emphasis by NIH on outside foreign involvement and sources of in-kind support necessitates that researchers be proactive in reviewing their Outside Activities and Interests Report (OAIR) and identifying any outside relationships, foreign or domestic, that involve research.
- All outside foreign agreements involving research or that otherwise relate to an individual's appointment or employment at a foreign entity must be provided for institutional review prior to submission to the NIH. English translations must be made available in addition to the original agreement.
- Researchers are strongly encouraged to use SciENcv to prepare their Biosketch and, when available, their Other Support/Current and Pending forms.

Requirements

We have developed an informational module to provide details of the new NIH and NSF requirements, and to meet the NDAA requirement to inform individuals listed on the application of the disclosure requirements.

The module will be available November 15, 2021 through the Harvard Training Portal (HTP), [you can access the course through this direct link: [Disclosing Other Support: Guidance for Faculty and Key](#)

Personnel] ensuring sufficient time for completion prior to January 25, 2022, when the new NIH disclosure requirements becoming effective on. The module will take approximately 30 minutes to complete and will provide an overview of the new requirements and information needed for faculty to prepare their disclosures.

Failure to complete the informational module by January 25, 2022 may result in delays in processing proposals and just-in-time submissions.

Please reach out to your Research Administration Office or me should you have any questions. Your school may also provide additional guidance on this matter.

We thank you for your continued attention to these issues and cooperation in ensuring the accuracy of the information provided to our federal sponsors.

A handwritten signature in blue ink, appearing to read "A. Tahmassian", with a horizontal line underneath.

Ara Tahmassian, Ph.D.
Interim Vice Provost for Research