



HARVARD UNIVERSITY  
Office of the Provost

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Dear Colleagues with Federal Awards;

Faculty should be cognizant of the increased scrutiny of information submitted to federal agencies, both in proposal applications and on RPPRs, as well as their other support, financial conflict of interest, biosketches, and outside appointment disclosures. These documents should be kept current and complete in compliance with all applicable University, local school policies and procedures, and federal requirements. Failure to comply with the requirements could jeopardize obtaining federal funding.

As you may be aware, both the National Institutes of Health (NIH) and the National Science Foundation (NSF) have recently issued guidance addressing the need for full disclosure of current and pending/other support, conflict of interest disclosure, and foreign component requirements in connection with federal awards:

**NIH:** Notice [NOT-OD-19-114](#): Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components (July 10, 2019)

**NSF:** [Federal Register Notice](#) (Federal Register / Vol. 84, No. 103 / Wednesday, May 29, 2019) requesting comments on the Draft Proposal & Award Policies & Procedures Guide (PAPPG) ([NSF 20-1](#)) dated May 2019.

[Existing Guidance and FAQs](#) concerning Faculty Disclosure and Intellectual Property are posted on OVPR website and are updated as agencies issue clarification.

### **Additional Information**

While these notices remain under review by the issuing agencies and we anticipate further clarifications, they reflect the agencies' increased scrutiny over the allocation of government funds and impacts of foreign influence on federally sponsored research, as was initially communicated to faculty back in April. The agencies' position remains that these are clarifications or reminders reiterating existing regulations, and that universities are expected to comply with the stated requirements, including with respect to required disclosures in proposal applications and research performance progress reports (RPPRs).

In close collaboration with our federal and university colleagues, Harvard is in the process of developing internal guidance and updated templates for our researchers and administrative staff in response to the agencies' mandates, with further communications and supporting documentation to follow.

Please note that these clarifications apply to **all senior/key personnel**, which includes all individuals who contribute to the scientific development or execution of a sponsored project in a substantive, measurable way, whether or not they request salaries or compensation. Other significant contributors, which the agencies generally define as those who commit to contribute to the scientific development or execution of the project, but do not commit any specified measurable effort (i.e. "person months"), remain outside the scope of the issued guidance.

Sincerely,

Richard McCullough  
Vice Provost for Research