

HARVARD
FINANCIAL ADMINISTRATION



RAS Tuesday
OSP Updates

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March 16, 2021

Agenda

- Proposals – NIH Reminder re: URLs
- Foreign Component Decision Document
- NIH Disclosure Information

Reminder: 2020 NOT-OD-20-174

NIH Policy on Use of Hypertext in NIH Grant Applications

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-174.html>

- We would like to remind the research community about the NIH Policy on Use of Hypertext, NOT-OD-20-174 <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-174.html>
 - Please note that hyperlinks and URLs are only allowed in NIH proposal submissions when specifically noted in funding opportunity announcement (FOA) and form field instructions. The use of hyperlinks is typically limited to citing relevant publications in biosketches and publication lists.
 - It is highly unusual for a FOA to allow links in Specific Aims, Research Strategy and other page-limited attachments.
 - Hyperlinks and URLs may not be used to provide information necessary to application review, i.e., “Overstuffing” and are considered security risks.
 - NSF also prohibits the usage of URL’s and hyperlinks for the same reasons.

Reminder: 2020 NOT-OD-20-174

NIH Policy on Use of Hypertext in NIH Grant Applications

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- The NIH Center for Scientific Review Division of Receipt and Referral (DRR) has begun rejecting proposals without review for the inclusion of URL's and hyperlinks in proposal submissions:
 - In some of these instances, sections of proposals that were either previously reviewed and scored, allowing for resubmission, or were awarded under a different proposal now may be flagged and rejected for the inclusion of URLs or hyperlinks.
 - We recognize that the use of URLs has become an industry-accepted citation method to document an existing tool or resource. DRR has been inconsistent in its application or acceptance of such standards, but it recently reaffirmed that URLs and hyperlinks must be removed from all proposal submissions.
 - OSP will be taking a more conservative review approach and recommending that all URL or hyperlinks outside of citing relevant publications in biosketches and publication lists are removed from federal proposal submissions.
 - Note: OSP will also recommend that any URLs or hyperlinks in Letters of Support, letterhead, or materials received from subcontractors also are removed. Please closely review these documents before submission to OSP.

Foreign Disclosure Decision Document

- Document completed by the Faculty Disclosure Working Group
- Posted on OVPR website, section on Faculty Disclosure Guidance
- Applicable to NIH awards
- Created to be used by faculty and staff

Do I Need to Seek Prior Approval for an NIH Foreign Component?

Purpose: This document assists researchers in identifying whether they need to request Prior Approval (permission) from the NIH to include a foreign collaboration or activity on an NIH funded project. It is based on the best available guidance from the National Institutes of Health and is not a substitute for a thorough review of NIH and Harvard policies and guidance. For questions about international collaborations or activities on a proposal or award from other federal agencies (e.g. NSF, DOD), contact your School's grant submitting office.

Definition of an NIH Foreign Component: The performance of any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, whether or not grant funds are expended.

Values Statement: Harvard University encourages meaningful collaborations that further our world-class research. We are proud of our domestic and global connections and value openness and inclusivity in research. Full disclosure and transparency of all relationships and resources (including foreign financial support and resources) highlight our values and productivity in service to our mission.

Investigator Responsibilities: Researchers must receive Prior Approval for Foreign Components before any work is initiated abroad, including for a Foreign Component added during an active NIH project period. Prior Approval is obtained by indicating the foreign component on the initial application or via a Prior Approval request submitted by your School's grants submitting office.

Support: Contact your School's grants submitting office for additional support or to make a Prior Approval request.

Part 1: Basic Question

Will activities or intellectual contributions in support of my NIH funded project be performed outside the U.S.? Yes No

No

If you answered "No" to this question, then you likely do not have a Foreign Component.

Yes

If you answered "Yes" to this question, then go to Part 2, Determine Significance

Part 2: Determine Significance

1. Will the foreign activity or contribution involve human subjects or animals subjects? Yes No
2. Will there be extensive foreign travel by recipient project staff for the purpose of data collection, surveying, sampling, and similar activities? Yes No
3. Will any activity of the project have an impact on U.S. foreign policy through involvement in the affairs or environment of a foreign country? Yes No
4. Will the contribution or activity abroad include direct and significant intellectual contributions to design, conduct or analysis of research in pursuit of specific aims included in the NIH proposal or RPPR? Yes No
5. Will the contribution or activity abroad be considered fundamental or essential to the completion of the proposed aims/scope of work on a specific NIH funded project? Yes No

Yes

If you answered Yes to any of the Determine Significance questions, then you must seek Prior Approval as an NIH Foreign Component before your international collaboration or activity begins. Next Step: Contact your School's grant submitting office. Prior Approval requests must be submitted to NIH by an Authorized Organization Representative on your behalf.

No

If you answered No to all five of the Determine Significance questions, then you likely do not have a foreign component. However, if you anticipate including foreign co-authors on publications that cite your NIH funding, use facilities or instrumentation abroad, or provide funds to or receive funds from an international collaborator, contact your School's grant submitting office to discuss if this constitutes a Foreign Component.

Unsure?

If you are still unsure whether an international contribution or activity is significant enough to rise to the level of a NIH Foreign Component, Prior Approval is recommended. Contact your school's grant submitting office.

Updated 2/22/2021, OVPR

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NIH Disclosure Information

Upcoming Changes to the Biographical Sketch and Other Support Format Page for Due Dates on or after May 25, 2021

Notice Number: NOT-OD-21-073

NIH's effort to align the Biographical Sketch (Biosketch), Other Support format page and Application Form Instructions with the guidance issued by the OSTP JCORE report

Issued Friday, March 12th 2021

NIH Disclosure Information

- Updated forms, formats and instructions for the Biosketch and Other Support
- Provides Other Support reminders
- Updated requirements for Other Support
 - Supporting documentation including copies of agreements for key personnel with foreign appointments or employment
 - Must be in English or translated
 - Immediate notification of undisclosed Other Support

NIH Disclosure Information

- Updated requirements for Biosketch
 - Personal Statement – include on-going and completed research projects for past 3 years that you want to draw attention to
 - In reverse order, all positions & scientific appointments (domestic & foreign), including foreign affiliations, whether paid, unpaid, volunteer or honorary – specific data required
- Effective May 25, 2021