

Subject: Responsibilities for Disclosure Requirements Related to Federally-Funded Research

Dear Colleagues,

As many of you are aware, there is heightened scrutiny from Federal Agencies that is resulting in University investigations and potential audits relating to disclosure of outside activities (see HHS OIG [workplan](#)). Several Federal Agencies, including NSF, NIH, DOE, and DoD, have expressed concerns recently regarding the accuracy of information provided in grant applications. Foremost among these was the [statement from NIH](#), focusing on three points:

1) improve accurate reporting of all sources of research support, financial interests, and affiliations; 2) mitigate the risk to intellectual property security while continuing NIH's long tradition of collaborations, including with foreign scientists and institutions; and 3) explore additional steps to protect the integrity of peer review. - Dr. Francis Collins, NIH Director

As a result, I would like to remind you of the following requirements:

- **Faculty Activity Report:** Please make sure that you have completed your annual Faculty Activity Report (<https://far.fas.harvard.edu>), [if required](#). It must include all your activities and affiliations outside of Harvard University. These activities may be paid or unpaid, foreign or domestic. Examples include board memberships (e.g., scientific advisory, oversight boards, boards of directors, etc.); visiting faculty appointments; research conducted outside of Harvard University; consulting engagements (e.g., companies, not-for profits, etc.); membership of foreign academies; etc. You may still access and update your Faculty Activity Report even though the deadline for completion has passed. Please contact Faculty Affairs if you have any issues doing this.
- **Financial Conflict of Interest:** Please make sure that you have completed your annual financial conflict of interest disclosure via <https://fcoi.harvard.edu/>. The disclosure must include all payments (e.g., honoraria, consulting fees, special awards, etc.) received from any entity listed in your outside activity report. It must also include all fiduciary or management positions (e.g., scientific advisory boards, boards of directors, etc.), regardless of whether these positions are compensated. Any new financial interests must be reported in the system within 30 days of acquiring the new interest.
- **Travel Support:** Please note that any investigator receiving funding from the U.S. Public Health Service, including the National Institutes of Health, must disclose via <https://fcoi.harvard.edu/> all travel support (reimbursements or paid directly by third parties on your behalf) exceeding \$5,000 per year from the same entity. Exceptions to this requirement include travel support from Harvard-administered sponsored awards, U.S.-based Institutions of Higher Education, U.S.-based academic medical centers, and U.S. federal, state, or local government boards and/or committees. See [here](#) for guidance on how to submit a travel disclosure.
- **NIH's Other Support, NSF's Current and Pending, and Similar Documentation for Other Sponsors:** When completing the NIH's Other Support, NSF's Current and Pending Support, or similar sections in other grant applications, you must include all sources of funding (e.g., federal, state, or local government agencies; foreign government agencies;

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public or private foundations; industrial or other commercial organizations; and internal funds) for both current and pending projects, even if you are not receiving salary support, as well as effort commitments. In addition, you must describe any scientific or budgetary overlap between the projects you list and the proposal you are submitting.

- ***Biosketch***: Other affiliations that may not be appropriate to report in the Current and Pending or Other Support sections must be included in the Biosketch section of federal grant applications, or similar sections in other grant applications. These affiliations may be paid or unpaid, foreign or domestic. Examples include visiting faculty appointments; honorary titles (e.g. Fellow of National Academy of X); foreign talent programs; consulting positions; etc.
- ***Federally-Funded Progress Reports and Publications***: Please be sure to include all related support in federally-funded progress reports and publications. Progress reports must identify any change in support that occurred over the period covered by the report.

Two documents with additional information have been prepared and are posted online:

- [Guidance on Responsibilities Regarding Reporting and Disclosure Requirements](#)
- [FAQ: Guidance on Responsibilities Regarding Reporting and Disclosure Requirements](#)

The agency guidance on these matters is subject to change. If you have any questions, please contact Kristen Harding (kharding@fas.harvard.edu; 617-384-6989).