

FAQ: Guidance on Responsibilities Regarding Reporting and Disclosure Requirements

Q: What do I have to disclose as part of my “Outside Activity or Other Professional Activity” reporting?

A: You should follow your School’s specific requirements. However, you must disclose all your domestic and foreign professional activities including but not limited to consulting and related outside professional activities, advisory board memberships, activities such as research projects, conferences, teaching programs, consulting agreements, etc., that faculty members wish to undertake on an individual basis.

Q: Do I have to disclose travel reimbursements in my Financial conflict of Interest disclosures?

A: Yes, if this relates to a PHS-funded Investigator. The PHS regulation requires Investigators to disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available) related to the Investigator’s institutional responsibilities. The disclosure requirement also applies to the Investigator’s spouse and dependent children. However, the disclosure requirement does not apply to travel that is reimbursed or sponsored by Harvard or the following entities:

- *a federal, state, or local government agency,*
- *an Institution of higher education as defined at 20 U.S.C. 1001(a),*
- *an academic teaching hospital,*
- *a medical center, or*
- *a research institute that is affiliated with an Institution of higher education.*

Note: *The exemption does NOT apply to any reimbursement from a foreign entity, university, or government.*

For additional information sees NIH FAQ E.8, E.9 and E.4

https://grants.nih.gov/grants/policy/coi/coi_faqs.htm#3383

Q: Is there a threshold for travel reimbursement disclosures?

A: There is a \$5,000 de minimis threshold to reimbursed or sponsored travel disclosure from any given entity in 12-month period. This includes all expenses such as transportation, accommodation, and food during a one-year period.

Q: When should I disclose my travel reimbursements?

A: Within 30 days, if greater than the \$5,000 threshold.

Q: What is meant by remuneration?

A: Remuneration includes salary and any payment for services not otherwise identified as university salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.

Q: What should be included in the “Current and Pending” or “Other Support” pages of the grant application?

A: You should follow the specific agency instructions. Agencies require that the page include:

- All current financial resources, whether Federal, non-Federal, commercial or institutional, available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts, and/or institutional awards. This includes all sources of funding from foreign sources.
- All pending applications (i.e., submitted but not funded yet) for funding to any Federal, non-Federal, commercial or institutional, or foreign entity.

Note: Training awards, prizes, or gifts do not need to be included.

Q: The “Other Support” pages of the grant application ask for OVERLAP (summarized for each individual), what is required.

A. The NIH “other support” form provides the following description:

“Overlap: After listing all support, you must summarize for each individual any potential overlap with the active or pending projects and the application in terms of the science, budget, or an individual’s committed effort”.

The [NIH Grants Policy Statement](#), 2.5.1 Just-in-Time Procedures, Other Support; requires this information for “IC scientific program and grants management staff will review this information before award to ensure the following:

There is no scientific, budgetary, or commitment overlap.

- Scientific overlap occurs when (1) substantially the same research is proposed in more than one application or is submitted to two or more funding sources for review and funding consideration or (2) a specific research objective and the research design for accomplishing the objective are the same or closely related in two or more applications or awards, regardless of the funding source.
- Budgetary overlap occurs when duplicate or equivalent budgetary items (e.g., equipment, salaries) are requested in an application but already are provided by another source.
- Commitment overlap occurs when an individual’s time commitment exceeds 100 percent (i.e., 12 person months), whether or not salary support is requested in the application.
- Overlap, whether scientific, budgetary, or commitment of an individual’s effort greater than 100 percent, is not permitted. Any overlap will be resolved by the IC with the applicant and the PD/PI at the time of award”.

Q: NSF Current and Pending support does not have Overlap, is it required information?

A: While NSF does not use the term overlap the Proposal & Award Policies & Procedures Guide (PAPPG), [Chapter II.C.2.h](#), Current and Pending Support provides the following description (underline added for emphasis):

This section of the proposal calls for required information on all current and pending support for ongoing projects and proposals, including this project, and any subsequent funding in the case of continuing grants. All current project support from whatever source (e.g., Federal, State, local or foreign government agencies, public or private foundations, industrial or other commercial organizations, or internal funds allocated toward specific projects) must be listed. The proposed project and all other projects or activities requiring a portion of time of the PI and any other senior personnel must be

included, even if they receive no salary support from the project(s). The total award amount for the entire award period covered (including indirect costs) must be shown as well as the number of person-months per year to be devoted to the project, regardless of source of support. Similar information must be provided for all proposals already submitted or submitted concurrently to other possible sponsors, including NSF. Concurrent submission of a proposal to other organizations will not prejudice its review by NSF. The Biological Sciences Directorate exception to this policy is delineated in Chapter I.G.2.

If the project now being submitted has been funded previously by a source other than NSF, the information requested in the paragraph above must be furnished for the last period of funding.

Q: I received an honorary visiting professorship at a foreign institution. Do I have to disclose it?

A: Yes. In addition to your School specific requirements, you must disclose all such affiliations in your biosketch submitted as part of a grant application.

Q: I received an honorary Membership at a foreign Academy of Sciences. Do I have to disclose it?

A: Yes. In addition to your School specific requirements, you must disclose all such affiliations in your biosketch submitted as part of a grant application.

Q: As part of a collaboration effort with a colleague at a foreign institution, we are submitting a joint application for funding to a foreign entity. What disclosures do I need to make?

A: You must consult with your School's Office of Research Administration (ORA) or Office of Sponsored Programs (OSP) for internal approval process. In addition, you must disclose all such applications in your "Current and Pending" or "Other Support". If the award is made, ORA or OSP will assist with the necessary modifications.

Q: What is a "Foreign Component"?

NIH defines a "Foreign Component" as:

"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. Activities that would meet this definition include, but are not limited to, (1) the involvement of human subjects or animals, (2) extensive foreign travel by recipient project staff for the purpose of data collection, surveying, sampling, and similar activities, or (3) any activity of the recipient that may have an impact on U.S. foreign policy through involvement in the affairs or environment of a foreign country. Examples of other grant-related activities that may be significant are:

- *collaborations with investigators at a foreign site anticipated to result in co-authorship;*
- *use of facilities or instrumentation at a foreign site; or*
- *receipt of financial support or resources from a foreign entity.*
- *Foreign travel for consultation is not considered a foreign component.*

U.S. institutions: If your proposed research relies on resources that exist outside the U.S., whether they are research subjects, facilities and equipment, or collaborators, then your research has a foreign component."

Q: I have a collaborator that will work in my laboratory funded by NIH but receives no salary from my NIH grant. Is this considered a "Foreign Component"?

A: NIH considers the following as examples of foreign components if your collaborator's work:

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- *Involve humans or vertebrate animals funded by NIH.*
- *You travel abroad for data collection, surveying, or sampling.*
- *Your project receives funding support from a non-U.S. foundation in addition to NIH funding.*
- *You carry out research at your institution's branch site in another country.*
- *A foreign investigator provides advice on your application's research design. (A general rule of thumb is that consultation from a foreign investigator becomes a foreign component if there is an expectation of publication co-authorship.)*

Conversely, the following examples are not foreign components:

- *You analyze existing data originally gathered abroad.*
- *You travel abroad exclusively for consultation.*