

**Examples of What to Disclose to NIH about Senior/Key Personnel on Applications and Awards:\***

<https://grants.nih.gov/policy/protecting-innovation.htm>

**Table 1: Recipients Must Report\*\***

Type of Activity	Report in Biosketch / Application	Report as Foreign Component in Application	Obtain Prior Approval and Report as Foreign Component in RPPR	Report as Other Support (JIT)	Report as Other Support (RPPR)	Review for potential FCOI
All positions and affiliations, including volunteer positions, relevant to the application	x					X If personal payments to the individual
Relevant appointments at foreign institutions – even if labeled as “guest,” “adjunct,” “honorary,” with or without salary support	x					x If personal payments to the individual
The number of person-months devoted to projects, even if there is no salary support or direct personal payments to the scientist				x	x If new	
Income, salary, consulting fees, and honoraria in support of an individual's research endeavors				x	x If new	x
Participation in a foreign talent or similar-type programs				x	x If new	x

Ongoing and completed research projects from the past three years that the applicant wishes to highlight	x					
All resources and other support, both domestic and foreign, for ongoing research projects, including those conducted at a different institution				x	x If new	x
In-kind contributions from domestic and foreign institutions or governments that support research activities				x	x If new	x
Performance of any significant part of an NIH project outside of the US, whether or not funds are expended		x	x If new			
Post-doc, student, or visiting scholar supported by a foreign government or institution				x	x If new	
Travel paid by a foreign institution or government over \$5,000 per year						x
Financial interests received from a foreign Institution of higher education or a foreign government					x	x

\*See [NOT-OD-19-114](#) for additional examples

\*\*This table will be adjusted as form updates are made.

## **Applicant and Recipient Institution Responsibilities**

- Work with faculty and other staff to make sure that all applications, progress reports (Research Performance Progress Reports), and Just in Time submissions include an accurate and complete account of all sources of research support, and relevant affiliations for individuals named as senior/key personnel
- Ensure that all researchers working on a grant disclose their significant financial interests in accordance with regulation and institutional policy
- Ensure that all reports and communications submitted to NIH are complete and accurate
- Protect proprietary information and sensitive and confidential data as part of proper stewardship of federally funded research
- Take all reasonable and appropriate actions to prevent the inadvertent disclosure, release or loss of sensitive personal information
- Immediately notify NIH of developments that have a significant impact on NIH-supported activities
- Disclose information throughout the grant process, from updating a principal investigator's biosketch and other support, submitting an application, progress reporting, and submitting final reports, or anytime there is a significant change that impacts the NIH award
- Obtain NIH prior approval for inclusion of any foreign components to an NIH award