

Eastern Michigan University

Office of Research Development and Administration

Reminder of requirements to include and document foreign activities through the NIH other support form and EMU's financial conflict of interest disclosure process

Introduction

In August 2018, [NIH issued a statement](#) recognizing that scientific excellence is built on founding principles of integrity and fair competition and that emerging threats to the of security of intellectual property, and integrity of peer review are a reality in today's world. Three emerging concerns of NIH include: 1) failing to disclose substantial contribution of resources from outside organizations; 2) diverting project-related intellectual property to entities other than the NIH-funded institution (and the public); and 3) sharing confidential information by peer reviewers with others, or otherwise trying to influence funding outcomes. These threats include interactions with both domestic and foreign entities. The Federal government, universities, PIs/Co-Is and the entire biomedical research community have an interest in ensuring that the trust and confidentiality of scientific research are not breached. NIH has committed to work with other national agencies to:

- 1) ["Improve accurate 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."](#)

On July 10, 2019, NIH issued NOT-OD-19-114 as a reminder to the research community about the requirement to report foreign activities in two places: 1) the Other Support form included in NIH proposals as a Just-In-Time document; and 2) EMU Conflict of Interest Disclosure process. This is to ensure there is no overlap in scientific, budgetary, or other commitments related to one's appointment at their home institution, an appointment one may have elsewhere, and NIH-funded research. With this guidance NIH is seeking to improve the reporting of all sources of research support, financial interests, and affiliations necessary to ensure the continue collaboration of international research during an environment of increased threats.

Other Support

NIH defines Other Support as "any and all resources and affiliations made available to an investigator in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are based at the institution the researcher identifies for the current grant." Completed and submitted to NIH as a Just-In-Time document, it is important that the Investigator is careful and discloses all other sources of support, whether in-kind, or monetary. This may include things like research gifts, consulting arrangements, appointments at foreign institutions and other items that fall outside of externally and internally sponsored activity.

Financial Conflict of Interest

In 2012, the U.S. Department of Health and Human Services issued revised rules pertaining to conflict of interest that are designed to promote objectivity in research. These rules apply to all Public Health Service grants and cooperative agreements, including the National Institutes of Health and other agencies that have adopted this rule (42 CFR Part 50, Subpart F).

Under these rules, Lead-PI, PIs Project directors, and any other person who is responsible for the design, conduct, or reporting of research funded by PHS, or is submitting proposals for funding must disclose all significant financial interests:

- prior to submitting the proposal;
- within 30-days of discovering or acquiring a new significant financial interest;
- prior to submitting a renewal proposal, or proposal for supplemental funding, and no cost-time extensions

Submission of a disclosure is required annually during any active project period.

For more information please see [EMU's policy](#) on disclosing conflicts of interest and contact the Office of Research Compliance with any questions.