

NIH Foreign Influence Disclosures Guidance for VT Researchers

Virginia Tech remains committed to meeting regulatory compliance in all areas of education and research activities so that stakeholders are responsible stewards of public and private funding. Federal sponsors issue requirements for researchers to disclose their foreign and domestic affiliations, interests, and activities; therefore, researchers must promptly disclose to federal sponsors all relevant activities and information that bear on potential conflicts of interest and commitment. Disclosure remains part of the broader set of researchers' responsibilities to ensure objectivity, honesty, transparency, fairness, accountability, and stewardship. The information below specifies the [National Institutes of Health requirements](#) for foreign influence disclosures.

What do researchers disclose?

Full transparency in NIH applications and throughout the life of an NIH grant is critical. NIH requires the disclosure of all sources of research support, foreign components, and financial conflicts of interest for senior/key personnel on research applications and awards.

The [NIH website](#) includes detailed information and a reference table regarding pre-award and post-award disclosure information in the *biographical sketch* and *other support* reports.

The table identifies where these disclosures must be provided in proposals, as well as in post-award project reports. View the most current table on the [NIH Requirements for Disclosure of Other Support, Foreign Components and Conflicts of Interest website](#).

Type of Activity	Biographical Sketch	Other Support	Annual Project Reports	Post-Award Information Terms & Conditions	Disclosed Not Required
Professional preparation (e.g., educational degrees)	X				
Organizational affiliations and appointments	X				
Academic, professional, or institutional appointments, whether or not remunerated by received, and whether full-time, part-time, or voluntary	X				
All projects currently under consideration from whatever source, and all ongoing projects, irrespective of whether support is provided through the proposing organization, another organization or directly to the individual, and regardless of whether or not they have resulted (e.g., even if the support received is in kind such as office/laboratory space, equipment, supplies, or employees)		X	X	X	
Current or pending participation in, or applications to, programs sponsored by foreign governments, institutions, or entities, including foreign government sponsored talent recruitment programs	X	X	X	X	
In-kind contributions not intended for use on the project (proposal being prepared)		X	X	X	
Visiting scholars in labs funded by an external entity		X	X	X	
Students and postdoctoral researchers funded by an external entity		X	X	X	
Consulting that falls outside of an individual's appointment, separate from institution's agreement		X	X	X	
Consulting that is considered part of an individual's appointment agreement with their home institution (e.g., a PI at a foreign institution's retention contracts within their home institution)					X
Travel supported (paid by an external entity) to perform research activities with an associated time commitment		X	X	X	
Travel supported (paid by an external entity) to attend a conference or workshop					X

How and when do researchers disclose?



Pre-Award Phase

- All positions, scientific appointments, organizational affiliations, and honors must be disclosed using the Biosketch form.
- In the pre-award/proposal stage, researchers must submit [Other Support](#) using Just-in-time (JIT) filing.
- Researchers are required to submit copies of agreements specific to senior/key personnel's foreign appointments and/or employment with a foreign institution for all foreign activities and resources. Upload the documents to the eRA Commons with the JIT information.
- Researchers must disclose whether a portion of a project will be conducted outside of the U.S.
- Foreign components must be disclosed in a proposal as a *Foreign Justification* attached to the [R&R Other Project Information Form](#).
- Senior key personnel must electronically sign their respective Other Support form prior to submission. The signature certifies that the statements are true, complete, and accurate.



Post-Award Phase

- Immediately notify the Post-award team and NIH of developments that have a significant impact on NIH-supported activities.
- Obtain NIH prior approval for inclusion of any foreign components to an NIH award.
- Other support occurring post-award must be disclosed using the [Research Performance Progress Report](#) (RPPR) form.
- When a sponsor discovers that a Principal Investigator or other Senior/Key personnel on an active NIH grant failed to disclose *Other Support* information outside of JIT or the RPPR, the recipient must submit updated *Other Support* to the Grants Management Specialist named in the Notice of Award as soon as it becomes known.

Questions? Contact foreigninfl@vt.edu.

For additional training, the Office of Sponsored Programs (OSP) offers [brief courses](#) on foreign influence disclosures. Find helpful information on the [NIH Foreign Interference site](#).