

Please see the below memo from Dr. Randolph Hall, Vice President, Research.

NIH recently issued a statement on their policies for disclosure of other support, foreign components, and financial conflicts of interest: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html>. All NIH investigators, and their staff, should carefully review the notice, as well as responses to frequently asked questions (<https://grants.nih.gov/grants/faq-other-support-foreign-components.htm>) to ensure that you have satisfied all requirements.

Consistent with current procedures, other support, and any associated updates, should be submitted to NIH via the Department of Contracts and Grants (DCG). Prior to an award being made, other support is reported using "Just In Time" procedures; after an award, the details must be disclosed in the annual research performance progress report (RPPR). Please note that any substantive changes in project or budget, including identifying and adding a significant foreign component, require NIH prior approval.

Please note that under USC policy:

- * Academic titles, whatever the title, at other institutions, whether the institution is foreign or domestic, require the written prior approval of the Vice Provost for Faculty Affairs, after recommendation of your dean. Approval is required whether or not you are compensated.
- * All paid research conducted for another entity (foreign or domestic) for which you will receive a direct payment (i.e., not through USC) must be disclosed and approved in advance. Such outside research is not permitted unless approved in advance as a special exception, both by your dean and by the vice president of research.

Please be sure that you do the following:

- 1) Complete all mandatory disclosure requirements in any new proposal and in any progress report.
- 2) Work with your Department of Contracts and Grants officer to submit any needed updates.
- 3) In the event that you have not disclosed your outside relationships to USC and/or do not have approval for that work, file a disclosure immediately in the diSClose system.
- 4) In the event you have not disclosed or received permission for an academic title at an institution other than USC, please request approval through your dean of faculty affairs, who will work with the provost office of faculty affairs on any needed approval.
- 5) Be sure that your 2019 annual conflict of interest disclosure includes all outside relationships that relate to your professional responsibilities at USC.

For more information on disclosing foreign research relationships, please consult the FAQs at:

<https://research.usc.edu/international-research/>