

PRINCETON UNIVERSITY

Office of the Dean for Research

To: Chairs, Directors and Department Managers of Units that Receive NIH Funding

From: Pablo G. Debenedetti, Dean for Research

Subject: Access to Faculty and Researcher Conflict of Interest Disclosure Information

Date: October 11, 2021

Dear Department Chair and Department Manager,

I trust that your academic year is off to a good start.

As we have communicated to you in [email messages](#) and in meetings over the last couple of years, federal research sponsors are increasingly requiring and enforcing disclosure and transparency standards regarding researchers' activities outside the University. Ensuring disclosure integrity—including that appropriate information on researchers' outside activities is disclosed to sponsors—is a shared responsibility among researchers and research administrators at the department and central levels.

In light of the upcoming changes to NIH guidance effective 1/25/22 (see the attached communication from 9/14/21), it is critical that personnel in your unit responsible for the development and review of NIH proposals, just-in-time (JIT) requests and progress reports appropriately take into account the outside activities of senior and key personnel. In addition to ensuring overall completeness and accuracy in compliance with the new NIH guidelines, this will allow us to identify in timely fashion the research-related outside activities with foreign entities for which the University must submit translated and unredacted agreements to the NIH. Please continue to encourage and support department-level grant administrators assisting with NIH submissions to open conversations with researchers regarding their current outside activities.

The institutional system containing information on researchers' outside activities is the Conflict of Interest (COI) system. As you know, department chairs and department managers currently have access to this information for researchers in their units. Going forward, especially in light of the new NIH requirements, situations may arise where grant administrators in your unit (or in units in which your researchers are jointly appointed and submitting proposals as senior or key personnel) may seek access to COI information of researchers in your department/unit. (This information may include parts A and B of the COI annual disclosure form listing the outside entities with which researchers have engagements, which would be a useful resource in the development of NIH biosketches and other support documents.)

The purpose of this communication is to make you aware that such situations may arise.

Decisions on whether or not to grant department-level grant administrators access to

researcher (including faculty) COI disclosures should be taken at the department level. At the very least, you may want to allow consultation about COI information between department managers and department-level (or center-based) grant administrators.

The Office of Research and Project Administration (ORPA) is ready to work with you on this and other matters related to the NIH's new guidance, including (should you so decide) giving access to faculty COI forms to department-level and/or center-level grant administrators. If you have questions, please contact ORPA Director Elizabeth Adams (ehadams@princeton.edu; 8-3090).

With best personal wishes (and apologies for the lengthy e-mail)

Pablo

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