



Managing the GMAS Research Team

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Guidance Rationale

The purpose of this business process guidance is to outline the responsibilities of Department and Central administrators in creating and maintaining an accurate record of key individuals on sponsored projects, to help ensure compliance with university and sponsor policies. This document should be used in conjunction with the guidance below, accessed on the [Research Team User Resources](#) page of the GMAS website:

- [Confirm Research Team](#)
- [Edit Research Team](#)
- [Research Team Roles and Responsibilities](#)

Note: this document references terms that are specific to NIH awards. However, the guidance should be applied to all sponsored projects.

The GMAS research team records certain information for principal investigators (PIs) and other key individuals on a sponsored project (i.e., the research team members). Specifically, the research team tracks members’ adherence to the following University requirements related to the conduct of research:

- Outside Activity and Interest Reporting (OAIR)
- Harvard Intellectual Property (IP) Policies
- Annual Malign Foreign Talent Recruitment Program (MFTRP) Attestation
- Research Security Training
- Sponsored effort commitments

The above requirements govern which roles/members must be added to the research team for all sponsored projects, and what team member updates are required throughout the project period.



Who Must Be Included on the GMAS Research Team?

All Harvard schools must include the following personnel categories/roles on all project research teams. Please see your school's guidance for additional requirements:

- ❖ **Principal Investigators** (the PI will automatically default to the research team)
- ❖ **Harvard Co-PIs**
- ❖ **Harvard Senior/Key Personnel** (or the equivalent, based on the sponsor's definition) listed on the proposal or award. For NIH awards, Key Personnel include the PD/PI(s) "and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they request salaries or compensation." *Note: mentors on individual fellowships automatically default to the research team but may be marked as not Key Personnel when applicable. The same applies to mentors on institutional research training grants such as NIH T32 or NSF REU; although they must be listed as Senior Personnel in the proposal submission, they are not required on the GMAS research team.*
- ❖ **Harvard Investigators** as designated by the PI per the Public Health Service (PHS) definition, are those individuals who are "responsible for the design, conduct, or reporting of the research." *Note: although the definition of Investigator is from PHS, projects with NSF and other sponsors who follow the PHS Financial Conflict of Interest (FCOI) policy will include the Investigator flag in GMAS.*
- ❖ **Harvard-based Faculty** participating in the project, even if not considered Key Personnel or Investigators. Note that the faculty designation in GMAS is derived from the individual's salary object code (6010, 6020, 6030, 6040) and includes those who may not have a faculty title.
- ❖ **Subrecipient Key Personnel** should be added to the research team when the subrecipient institution will be following Harvard's COI policy and/or MFTRP attestation process.

Do not include the following categories/roles on the research team:

- ❖ TBD/TBN roles
- ❖ Consultants
- ❖ Subrecipient personnel (even if key), unless the subrecipient institution will be following Harvard's COI policy and/or MFTRP attestation process
- ❖ Other Significant Contributors (OSC) on NIH awards who are not Harvard faculty

Note: it is no longer the expectation that all personnel paid from the award or performing research on the award should be included on the research team. If you have questions about who can be added to the research team (outside of the above categories), please reach out to your school or central sponsored programs office.

Approvals: OAIR, Participation Agreement, Annual MFTRP Attestation, and Research Security Training

The PI, other Key Personnel, and those individuals on the project designated by the PI as "investigators" (per the above PHS definition) are required to:



- report to the University their outside activities and interests¹,
- sign [Harvard's Participation Agreement](#)²,
- complete the [Harvard Malign Foreign Talent Recruitment Program \(MFTRP\) Attestation](#) on at least an annual basis, and
- complete the Harvard Research Security Training (for federal awards only)

Adding these individuals to the GMAS research team enables the University to track compliance with Harvard's outside activity reporting, intellectual property policies, Malign Foreign Talent Recruitment Program Policy and requirements, and research security requirements.

The mechanism for reporting outside activities and interests is through Harvard's Outside Activity and Interest Reporting ([OAIR system](#)). When an individual is added to a project's research team with the "Investigator" box selected, they will receive an email from oir@harvard.edu with a link to the research certification for that project. The Investigator will continue to receive email notifications until they have completed the certification in OAIR. (See the [GMAS-OAIR Integration](#) job aid for details.)

By signing [Harvard's Participation Agreement](#), these individuals confirm their compliance with the University's [Statement of Policy in Regard to Intellectual Property](#) (or "IP Policy") and other research-related guidelines.

When an individual is added to a project's research team as a PI, Senior/Key Personnel, or with the "Investigator" box selected, they will receive an email from research_adminportal_help@harvard.edu with a link to complete the attestation in the Research Administration Portal. See the [GMAS-Research Admin Portal MFTRP Attestation Integration](#) job aid and the [MFTRP Attestation Guidance for Covered Individuals](#) for details.

When an individual is added to a project's research team as a PI, Senior/Key Personnel, or with the "Investigator" box selected on a federal project, they will receive an email from trainingportal@harvard.edu with a link to complete the Research Security training in the Harvard Training Portal. The course will be recommended at proposal stage, and if still incomplete at award stage another notification will be sent indicating it is now required. Awards will not be set up unless all required individuals complete the Research Security Training. See the [Harvard Research Security Training information](#) for details.

Committed Effort Tracking

PIs, Harvard faculty, and other Key Personnel are also required to meet the effort commitments made to the sponsors of their awards. We refer to this as "effort commitments" or "committed effort." **Harvard defines committed effort** as the effort, in units of time, that Harvard has communicated to the sponsor that the team member will spend on the project, regardless of sponsor effort requirements. Typically, this communication of committed effort takes place with the submission of the initial proposal and is usually part of the budget and budget justification/narrative.

The University utilizes GMAS, as the system of record for sponsored programs, to help identify whether faculty and other Key Personnel who have effort commitments on sponsored awards are:

- meeting their commitments to our sponsors
- overcommitted on sponsored projects

¹ OAIR approvals generate for all sponsored projects for senior/key personnel and investigators at HMS and HSDM. For senior/key personnel and investigators at other tubs, OAIR approvals generate only for PHS+ sponsored projects.

² Note that departments/local managing units are responsible for ensuring that all researchers sign the Harvard participation agreement before conducting research, even if they are not designated as key/investigator on a GMAS project.



These individuals' committed effort appears on their "Active and pending projects³" report in GMAS, which can be downloaded from their person profile. This report displays both their effort commitments on each sponsored award and their total active and pending committed effort. Ensuring that the effort commitments communicated to the sponsor are accurately reflected in each project and on this report is essential to meet the two compliance requirements listed above.

When Should Committed Effort on a Research Team Be Updated?

Because the research team displays the *effort committed to the sponsor*, and not the expended or charged effort at any point in time, only effort changes that have been communicated to the sponsor – and when required, accepted by the sponsor – should be captured by editing the GMAS research team. **A change in effort expended and charged, or cost shared, does NOT change the commitment and should not be reflected on the research team.**

Effort commitments to a sponsor are considered to be met when the individual has expended effort comparable to their effort committed to the sponsor, within reason and over a period of time (usually equivalent to the current awarded budget period). The person's effort may vary throughout a period, but if their average effort expended for the period as a whole is roughly equivalent to their committed effort, the commitment has been met. **Committed effort on the GMAS research team should NOT be updated throughout the period to align with changes to the individual's effort charged to the award.** This applies to changes in effort expended, charged, or cost shared in a no-cost extension (NCE) period as well.

Effort commitments in GMAS should only be edited when one of the following conditions has been met:

1. For team members who are designated as key personnel and for whom **sponsor approval is required** to change their effort⁴: the GMAS effort commitment should be updated once written approval has been received from the sponsor for the change (e.g., prior approval from NIH of senior/key personnel reducing their effort by 25% or more).
2. For team members who are designated as key personnel, but **no written sponsor approval is required** to change their effort: the GMAS effort commitment should only be updated when the PI notifies the sponsor in writing of a change in committed effort. The notification to the sponsor should be uploaded to the GMAS Edit research team request and routed for central review (e.g., NSF progress reports are currently not reviewed or submitted by a Central reviewer. If the PI communicated a change in effort to NSF in an annual progress report, please upload the progress report as documentation of the notification of changed effort).

Note that submission of estimated effort on NIH Other Support and NSF Current & Pending Support does not constitute notification to the sponsor of a change in effort commitments. Additionally, effort estimates for Other Support/Current & Pending Support do not need to match the effort commitments recorded in GMAS, and likewise, the GMAS committed effort should not be updated to match estimates provided on Other Support/Current & Pending Support.

Also note that for most NIH grants, prior approval for effort reductions in the upcoming budget period may be requested within the Research Performance Progress Report (RPPR). See the [Roles and Responsibilities](#) document for guidance on Requesting NIH Effort Reductions via the RPPR. For other sponsors, follow the sponsor's guidelines for requesting or communicating changes to effort commitments.

³ Because the "pending" section of the Active and Pending awards report will not include projects where personnel are only intended for inclusion as Additional People with Costing, GMs should confirm with PI the existence of other pending awards on which they have been named to a non-key/senior/investigator role when confirming their own Other Support.

⁴ These individuals should be marked as Key Personnel on the GMAS research team with the Sponsor Approval flag marked Yes.



When Does Committed Effort Not Apply?

There are instances where individuals who must be listed on the research team (see [Who Must Be on the Research Team?](#)) do not have effort commitments that were communicated to the sponsor (i.e., they weren't required to list effort on the application or they do not have effort on the sponsored award in question). **Zero (0.00) person months should be entered in the committed effort field within the GMAS research team** in these cases.

Examples where effort commitments are not necessarily required include

- subrecipient key personnel
- fellowships*
- training grants
- conference grants
- awards to support travel or workshops
- equipment grants

*Most fellowship awards do not fund research expenses (e.g., lab supplies, animal costs), but instead provide a stipend to offset the fellow's living expenses while they are being trained. Likewise, the mentor is not compensated from the award and typically is not required to maintain a quantified level of effort. For these fellowship awards, enter zero (0.00) person months in the committed effort field on the research team for both the fellow, entered with the role of PI, and the mentor.

Revision History

- 7/1/2022: Initial guidance effective date
- 8/9/2024: Effective date for revisions related to MFTRP attestation requirements
- 1/31/2025: Effective date for revisions related to Research Security Training requirements