UNIVERSITY OF DELAWARE
RESEARCH OFFICE

Disclosure and Other Updates for NIH

May 2021

Why is the National Institutes of Health (NIH) interested in Other Support and Biosketch information?

NIH is seeking to identify and address:

1. Potential scientific and budgetary overlap with the proposed research to avoid duplication of funding for research requests
2. Investigator and staff under and over commitment (effort greater than 100%)
3. Security and integrity concerns of publicly funded U.S. research

UNIVERSITY OF DELAWARE.

NIH Disclosure Requirements

NIH Biosketch
List all positions and scientific appointments both domestic and foreign held by senior/key personnel that are relevant to an application including affiliations with foreign entities or governments. This includes titled academic, professional, or institutional appointments whether or not remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary).

NIH Definition of 'Other Support' (NIH Grants Policy Statement – April 2021):
"…includes *all* resources made available to a researcher or senior key personnel 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*. Other support does not include training awards, prizes, start-up support from the US based institution, or gifts (note: Gifts are resources provided where there is no expectation of anything (e.g. time, services, specific research activities, money, etc.) in return)."

Foreign Components, defined as the existence of "significant scientific element or segment of a project" outside of the United States, whether or not NIH grant funds are expended, require prior approval from NIH if not included in the original application.

UNIVERSITY OF DELAWARE

NIH Reminders

1. Immediately notify NIH of developments that have a significant impact on your NIH-supported activities
2. Ensure that all reports and communications are complete and accurate
3. **Disclose to NIH whenever your scope of work includes a "Foreign Component," i.e., when a significant part of the project is conducted outside of the United States.**

When determining the existence of a Foreign Component, <u>it does not matter</u>:
- Who is doing the work outside of the U.S., or
- Who (if anyone) is paying for the work being done outside of the U.S.

When assessing possible Foreign Component, consider:
- Collaborations with investigators at a foreign site anticipated to result in co-authorship.
- Use of facilities or instrumentation at a foreign site.
- Receipt of financial support or resources from a foreign entity.

UNIVERSITY OF DELAWARE®

Additional NIH Updates

- When foreign appointments or employment is included in Other support, supporting documentation (in English) should be provided.
    - Per May 6, 2021 email from the NIH's Mike Lauer, this requirement will not be enforced until January 25, 2022.

- Biographical Sketch and Other Support updates *expected* to be included in applications starting May 25, 2021 and *required* to be included in application starting January 25, 2022.

- New requirement for all key personnel to have an eRA Commons Credential:
    - Effective January 25, 2022, NIH will require all individuals listed on the R&R Senior/Key Profile Form to have an eRA Commons username (Commons ID)
    - See https://grants.nih.gov/grants/guide/notice-files/NOT-OD-21-109.html for full details.

Resources

- NIH GPS: https://grants.nih.gov/policy/nihgps/index.htm
- NIH Reminders on Other Support, Financial Conflict of Interest and Foreign Components: https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html
- UD Research Office– Regulatory Affairs: https://research.udel.edu/regulatory-affairs/
- UD Research Office – Foreign Involvement: https://research.udel.edu/regulatory-affairs/foreign-involvement/

UD will release detailed guidance on new NIH guidelines on the RO website and via email communicate with faculty and staff.