UPDATED REQUIREMENTS FOR NIH OTHER SUPPORT

BACKGROUND AND IMPORTANCE

The National Institutes of Health (NIH) needs to understand the degree to which the Principal Investigator (PI) or other senior key personnel have support and/or resources from other sources for their research activities. The primary drivers cited for seeking this information are to ensure proper commitment of time (avoiding *both* under-commitment and over-commitment) by the senior personnel working on the project and avoiding duplication of funding for research requests.   Given the recent additional scrutiny by the federal government on foreign influence (and particularly, scans for an inappropriate foreign influence), additional information is being requested. These requirements continue to evolve, and this page will be updated to reflect the latest information.

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)."

Data that is requested for each reportable activity includes (in this order):

	Active AND Pending	Completed (within the past three years)	In-Kind Active and Pending (not intended for use on the project being proposed)
Title	✓	✓	✓
Major Goals	✓	✓	✓
Status of Support	✓	✓	✓
Project number	✓	✓	✓
Name of Principal Investigator (contact PI if multi-PI study)	✓	✓	✓
Source of support (fund source)	✓	✓	✓
Primary Place of Performance	✓	✓	✓
Proposal Start and End Date	✓	✓	Provide when applicable
Total Award Amount (see below) *New	✓		Estimated value of in-kind contribution
Person Months devoted by reporting investigator per budget period (see NIH guidance) **New	✓		✓ (or reasonable estimate)

*For each reportable activity, include the total award amount (including Facilities and Administrative Costs) for the entire award period.

Number of person-months **per budget period to be devoted (e.g., 1.5 months).

Also required are:

Overlap: After listing all support, summarize any potential overlap with the active or pending projects and activities, other positions, affiliations, and resources and this application in terms of the science, budget, or an individual's committed effort.

Signature: Each PD/PI or other senior key personnel must electronically sign their respective Other Support form prior to submission. This signature certifies that the statements are true, complete and accurate.

WHO MUST REPORT:

- Principal Investigator
- All other senior/key personnel listed in a grant application except Other Significant Contributors and Program Directors, training faculty, and other individuals involved in the oversight of training grants
- Any 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.

WHEN TO REPORT:

Expected starting May 25, 2021 and *required* starting January 25, 2022:

- [Just-in-Time](#) (upon request by NIH after proposal submission but prior to award).
- After Just-in-Time but prior to receipt of award (reporting required only if changes are substantive* in nature)
- Via Prior Approval Request for substantive* changes that occur during the award period but prior to the due date of the next RPPR.
- Research Performance Progress Reports (annual progress reports) – report changes only
- Upon request by NIH

  *While NIH does not define "substantive", the concept is that the change is of a magnitude that NIH might prudently need to review the new arrangements to ascertain whether the existence, timing or the amount of NIH's award might need to change in light of the new information (e.g. substantive new support that alters the reporting investigators availability or where a prudent person might question whether there is scientific or financial overlap)

FORMS/INSTRUCTIONS FOR REPORTING

NIH Other Support Format Page:
https://grants.nih.gov/sites/default/files/other-support-format-page-rev-12-2020.docx
http://grants.nih.gov/sites/default/files/nih-other-support-instructions-rev-12-2020.docx

WHAT TO REPORT:

Other Support **includes** all resources made available to a researcher 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. This includes but is not limited to:

- Resources and/or financial support from all foreign and domestic entities, that are available to the researcher. This includes but is not limited to, financial support for laboratory personnel, and provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.). Institutional resources, such as core facilities or shared equipment that are made broadly available, should not be included in Other Support, but rather listed under Facilities and Other Resources.

- Consulting agreements, when the PD/PI or other senior/key personnel will be conducting research as part of the consulting activities. Non-research consulting activities are not Other Support.

- In-kind contributions, e.g. office/laboratory space, equipment, supplies, or employees or students supported by an outside source. If the time commitment or dollar value of the in-kind contribution is not readily ascertainable, the recipient must provide reasonable estimates.

Other support **does not include** training awards, prizes, or gifts. Gifts are resources provided where there is no expectation of anything (e.g. time, services, specific research activities, money, etc.) in return. An item or service given with the expectation of an associated time commitment is not a gift and is instead an in-kind contribution and must be reported as such.

SUPPORTING DOCUMENTATION:
Provide copies of contracts specific to senior/key-personnel foreign appointments and/or employment with a foreign institution for all foreign activities and resources that are reported in Other Support. If they are not in English, recipients must provide translated copies.

Supporting Documentation should be provided as a PDF following the Other Support form. Per May 6, 2021 email from the NIH's Mike Lauer, this requirement will not be enforced until January 25, 2022.

ADDITONAL GUIDANCE FROM NIH:
NIH has a webpage devoted to Other Support, which includes FAQs and instructions, as well as a page that includes examples on what to disclose.

See also:

- NOT-OD-21-073: Upcoming Changes to the Biographical Sketch and Other Support Format Page for Due Dates on or after May 25, 2021
- Frequently Asked Questions (FAQs) – Other Support and Foreign Components
- University of Delaware Research Office, Foreign Involvement
- NOT-OD-19-114: Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components.
- Mike Lauer's 7/19 Blog post entitled, "Clarifying Long-Standing NIH Policies on Disclosing Other Support"
- NIH Protecting Biomedical Innovation (including helpful reporting at-a-glance chart)

IN SUMMARY:

Other Support Changes	Effective May 25, 2021	Effective January 25, 2022
Disclose all sources of Other Support and related information, including outside activities (e.g. consulting, visiting professorships) if conducting research, In-Kind support, and gifts if donor expects anything in return (e.g. time, services, research).	Required	Required
Follow new format	Not required	Required
Separate sections for Project/Proposal Support and In-Kind	Not required	Required
Completed Support for the last 3 years	Not required	Required
Submit copies of agreements for investigator's foreign appointment/employment if listed as Other Support	Not required	Required
If agreement not in English, provide translated copy	Not required	Required
Redact confidential information expect for key provisions (e.g. award amount, dates)	Not required	Required
When requested, provide copies of agreements for investigator's foreign appointment/employment if listed as Other Support	Required	Required
Each senior/key person electronically signs PDF of their Other Support	Not required	Required
If Other Support signed, flatten PDF prior to submission	Required	Required
Submit updated Other Support immediately upon learning a source of Other Support for an active NIH grant was not disclosed	Required	Required