Complying with NIH Policy when Completing Grant Applications
Current, as of June 11, 2021

The information below is intended to guide users to complete the NIH Other Support, Biosketches, and Foreign Component information.

May 17, 2021: PIs have asked for more guidance on reporting research collaborators as NIH Other Support. Please review UC's guidance on when to report collaborators to the NIH, which includes several examples.

May 11, 2021: In response to concerns raised by the academic community, NIH is deferring implementation of its new Other Support and Biosketch formats and the other new requirements imposed in Notice NOT-OD-21-073 which was issued on March 12. The changes will now go into effect on January 25, 2022 instead of May 25, 2021.

You still must disclose all Other Support as described in that Notice and in Notice NOT-OD-19-114 in your just-in-time submissions and RPPRs. And you should contact the Conflict of Interest Office if you have any previously undisclosed other support.

April 28, 2021: NIH issued a follow-up Notice: NOT-OD-21-110 regarding the May 25th deadline for reporting Other Support and biographical information on the Biosketch.

March 12, 2021: NIH issued Notice No. NOT-OD-21-073, which announced updated application forms and instructions intended to further promote transparency and full disclosure of all resources (both domestic and foreign) that directly support the individual's research endeavors. All proposal applications and Just-In-Time requests either submitted or with due dates on or after May 25, 2021, must comply with these new requirements.

Please review [Notice No. NOT-OD-21-073](#), along with NIH's revised [Biosketch Instructions](#) and [FAQs](#) and [Other Support Instructions](#) and [FAQs](#).

Other Support, Biosketches and Facilities, Equipment and Other Resources

Other Support and Biosketches must be provided for all senior/key personnel and faculty associates. The term "senior/key personnel" includes:

(Co)Principal Investigator(s) - the individual(s) designated by the grantee and approved by NIH who will be responsible for the project's scientific or technical direction. If more than one, the first one listed will have primary responsibility for the project and the submission of reports.

Checklist and Guidance for Complying with NIH Policy when Reporting Other Support v.5 (5/11/2021). Thank you to University of California, Santa Barbara and Caltech for their very helpful website on these requirements.

Faculty Associate (faculty member) - an individual other than the Principal Investigator(s) considered by the performing institution to be a member of its faculty or who holds an appointment as a faculty member at another institution and who will participate in the project.

Biosketch	Appointments: All positions, domestic and foreign, including titled academic, professional, or institutional and regardless whether full-time, part-time, voluntary, adjunct, visiting, honorary, or if remuneration is received.
	Include all external positions and scientific appointments, including affiliations with foreign entities or governments. This includes titled academic, professional, or institutional appointments if remuneration of any kind (compensation or in-kind) is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary), as Other Support if held by senior/key personnel and regardless of whether awarded through UC, another institution or directly to the researcher.
	Note that external appointments that do not involve any remuneration should be reported in the Biosketch, and paid appointments must be included in Other Support
	Changes effective January 25, 2022 (postponed from May 25, 2021):
	Section A
	• Section A ("Personal Statement") adds language specifying that this section should be used for "including details on ongoing and completed research projects from the past three years that the researcher wants to draw attention to (previously known as research support)".
	Section B
	• Section B, "Positions and Honors," has been renamed "Positions, Scientific Appointments, and Honors". • Changes order of listing from "chronological order" to "reverse chronological order." • Revised to include the following specific language: "List in reverse chronological order all positions and scientific appointments both domestic and foreign, 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)."

	Section D
	• Non-Fellowship Biosketches - Section D ("Scholastic Performance") has been removed.
	• Fellowship Biosketches - Section D ("Scholastic Performance") has been updated to remove "Research Support".
	Updated SciENcv Template
	• NIH anticipates that the updated SciENcv Biosketch template will be available by FY2022. Those with existing biosketches in SciENcv should be able to transfer their current biosketch information to the new format.
	NIH references:
	• [Biosketch Format Pages, Instructions and Samples (updated March 2021)](#)
	• [Frequently Asked Questions (FAQs) - Biosketches (updated March 2021)](#)
	• [Instructions for a Biographical Sketch](#)
	• [Protecting US Biomedical Intellectual Innovation](#)
	Consider using [ORCiD Open Researcher and Contributor ID](#) - a unique, persistent identifier free of charge to researchers. More information may be found at: https://grad.uc.edu/student-life/news/orcid-basics.html
Foreign Components	NIH requires grantees to seek **prior approval** of when a non-US entity will be performing a significant part of an NIH-funded project, regardless of whether NIH funds will be used to support that work.
	Performance of any significant part of an NIH project outside of the US includes, but is not limited to:
	UC should evaluate the activity being conducted outside of the United States within the context of the project as a whole, and make a determination about its significance and whether it is a Foreign Component. Examples of activities that may be considered a significant element of the project include, but are not limited to:
	• 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

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	Note: If the PI expects to name a foreign collaborator on any publications resulting for than NIH-funded project, name the person and the entity as a "foreign component" in the application, and seek prior approval before engaging the collaborator. NIH references: • Protecting US Biomedical Intellectual Innovation • Frequently Asked Questions (FAQs) - Other Support and Foreign Components

Complying with NIH Policy when
Completing Just-In-Time (JIT) Submissions
Current, as of May 11, 2021

Institutional Financial Resources

Note that in addition to the traditional forms of support, some Institutional resources must also be disclosed.

Type	Should it be reported to NIH?
Internal Awards (e.g., UC Accelerator Awards)	Internal awards are included in Other Support if the award is in direct support of a research project. Specifically, the awards are used for a project that has (1) scope of work; (2) budget; (3) effort commitment by the PI; (4) period of performance.
Gifts made to UC	UC and the federal government define a gift as something given without expectation of anything in return. If an item or service meets the definition of a gift, it is not reported as Other Support. If you plan to use your designated gift

	funds in support of your research, they must be disclosed as Other Support. Also, 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 to NIH.
Start-up funds	UC start-up packages provided to the PI from UC are NOT included in Other Support. Start-up packages from institutions other than UC must be reported in Other Support.

Other Support	**ATTENTION: NEW CHANGES TO OTHER SUPPORT, EFFECTIVE JANUARY 25, 2022 (postponed from MAY 25, 2021** *(see* NIH Notice No. NOT-OD-21-073*, issued March 12, 2021)* **Re-Organization of Form** • The format page has been restructured, separating funded projects from in-kind contributions. **Signature Block Added** • All PD/PIs and other senior/key personnel must electronically sign the Other Support form prior to submission to NIH, certifying that the information is accurate and complete. Other Support forms must be submitted as a flattened PDF after all signatures are obtained. Original electronic signatures must be maintained and made available upon request **Supporting Documentation Relating to Foreign Activities or Resources** • If the Other Support submission includes foreign activities or resources, copies of contracts, grants, or any other agreements specific to the PD/PI or other senior/key-personnel's foreign appointments, affiliations, and/or employment with a foreign institution must be included with the Other Support submission. These documents must be translated into English if they are in a foreign language. **Immediate Notification of Undisclosed Other Support** If an organization discovers that a PD/PI or other senior/key personnel on an active NIH grant failed to disclose Other Support information outside of Just-in-Time or RPPR submissions, the institution must submit updated Other Support to the Grants Management Specialist named in the Notice of Award as soon as it becomes known. If you believe you need to disclose new information to NIH, please contact the Conflict of Interest Office.

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Formatting & Future Transition to SciENcv

- NIH anticipates that the SciENcv template for Other Support will be available beginning in FY 2022. Until then, the MS Word version of the Other Support form should be used. (It must be converted to PDF and electronically signed prior to submission.)

How does NIH use Other Support Information?

NIH states that its scientific program and grants management staff review Other Support information to ensure that:

- All resources, domestic or foreign, directly supporting the individual's research endeavors have been reported
- Sufficient levels of effort are committed to the project
- There is no scientific, budgetary, or commitment overlap
- Only funds necessary to the approved project are included in the award
- Any foreign resources that meet the definition of a foreign component have received appropriate prior approval.

In addition to the above new requirements (which go into effect May 25, 2021), Other Support submissions must report the following, based on current, established NIH requirements:

NIH uses the information submitted in the Other Support section to assess the individual researcher's capacity to carry out the project as proposed and help assess any potential overlap or duplication with the project being proposed.

NIH requires information on awards from the past 3 years, current and pending support for ongoing projects and proposals **(new).**

All domestic and foreign research collaborations that directly benefit the researcher's research endeavors **(new)**.

Include the following Other Support information:

- All planned, pending and current project support and in-kind support that is either provided directly to the individual, or through an organization in support of that individual's research endeavors, from whatever source, including, but not limited to:

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	- Contracts or Cooperative Agreements for Research – All such sponsored agreements for research or educational activities that take place at UC or elsewhere must be included as Other Support. - Consulting activities that involve performing research for other entities must be included in Other Support **(new)**.
	
	Reminder: Consulting Agreements - Consulting activities are considered outside activities and must be reported through the UC OAR Disclosure System regardless of whether external consulting supports research endeavors. - Fellowship Program - Included in Other Support If the fellowship is granted to the Principal Investigator and/or key personnel. - Foreign Talent Program[1] - Include in Other Support for the Principal Investigator and any senior/key personnel**. (new)** - Grants for Research - Included as Other Support regardless of whether or not the grants are based at UC **In-kind Support**
	
	In-kind support: Other resources made available to a researcher in support of and/or related to all of their research endeavors, regardless of whether they have monetary value and 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
	    - postdoctoral fellowships paid directly to a researcher funded by a foundation or other organization
	    - the provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.).

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[1] Foreign Government Talent Recruitment Program. In general, such programs include any foreign-state-sponsored attempt to acquire U.S. scientific-funded research or technology through foreign government-run or funded recruitment programs that target scientists, engineers, academics, researchers, and entrepreneurs of all nationalities working or educated in the United States. These recruitment programs are often part of broader whole-of-government strategies to reduce costs associated with basic research while focusing investment on military development or dominance in emerging technology sectors. See https://www.sciencemag.org/sites/default/files/January%20DOE%20memo.pdf for more information, including distinguishing features of a foreign government talent recruitment program as defined by the Department of Energy.

	- 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.
	 - All domestic and foreign research collaborations that directly benefit the researcher's research endeavors.
	      - report collaborators with whose experiments directly benefit your research, or
	      - provide you with "high value" materials, samples, etc. that you would plan to acknowledge as contributions to your work in a publication.
	
	 When in doubt, err on the side of disclosure to federal sponsors.
	
	 Projects and Activities - All Projects and Activities not already included above are included as Other Support if the project or activity supports an individual's research in any way at UC or any institution or entity.
	
	 Prizes and Training Grants - Not included as Other Support
	
	 NIH references:
	
	 - Other Support Instructions *(updated March 2021)*
	 - Frequently Asked Questions (FAQs) - Other Support and Foreign Components *(updated March 2021)*
	 - Protecting US Biomedical Intellectual Innovation
	 - Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components
	 - COGR - Commentary on Disclosing Other Support and Other Resources in Research Funded by the National Institute of Health

Other disclosures during JIT	***Please note that UC is required to promptly notify NIH of any substantive changes to previously submitted Just-in-Time information up to the time of the award.*** Accordingly, review the Biosketch and other disclosures and make any necessary revisions before submitting JIT information for a new award.

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