

The background features abstract, overlapping geometric shapes in various shades of green, ranging from light lime to dark forest green. The shapes are primarily triangles and polygons, creating a dynamic, layered effect. The central text is positioned in the white space between these green elements.

Office of Sponsored Projects Federal Transparency, New Requirements

June 2021

Science & Security

What is driving some of the changes at federal agencies with respect to grant applications, other support and foreign involvement?

Transparency: Federal Agency Initiatives, Announcements and Clarifications

Funding agency concerns:

- ▶ Failure to disclose resources for research at non-U.S. universities
- ▶ Conflicts of commitment (“conflicting obligations ... among multiple employers or other entities”)
- ▶ Diversion of intellectual property and know-how developed with federal funding
- ▶ Breach of confidentiality of peer review

Concerns also voiced by members of Congress from both parties, including post-transition

Ongoing investigations and prosecutions linked to failure to disclose and other issues

NIH Notices on Other Support, Foreign Components, Biosketch

Number	Date	Title	Highlights
NOT-OD-19-114	7/10/19	Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components	<ul style="list-style-type: none"> • Remind to report foreign activities in other support, foreign components, and financial conflict of interest • All resources made available to a researcher in support of and/or related to <i>all</i> of their research endeavors • All positions, scientific appointments, domestic and foreign held by SKP relevant to application incl. affil. foreign entities or govt. • Foreign component: existence of any “significant scientific element or segment of a project” outside of the United States
NOT-OD-21-073	3/12/21	Upcoming Changes to the Biographical Sketch and Other Support Format Page for Due Dates on or after May 25, 2021	<ul style="list-style-type: none"> • Align Biosketch, Other Support format and Application with OSTP and other guidance • Updated forms required after 5/25/21 • ‘Positions and Honors’ now ‘Positions, Scientific Appointments, and Honors’ • Other support page reorganized to separate funded support from <i>in-kind</i> • Signature block on OS • Supporting documentation for contracts, grants or agreements for foreign appts./employ. • Immediate notice of undisclosed other support
NOT-OD-21-110	4/28/21	Implementation of Changes to the Biographical Sketch and Other Support Format Page	<ul style="list-style-type: none"> • NIH expects updated biosketch, OS format for applications, JIT, and RPPR as of May 25, 2021; require by 1/25/22 • Responsible for disclosing all research endeavors regardless of the forms used; must still capture all the necessary information
Extramural Nexus	5/5/21	Updated Biographical Sketch and Other Support Format Pages Available Now and Required January 2022	<ul style="list-style-type: none"> • Use of the new format pages is preferred immediately and required for due dates and submissions on or after January 25, 2022 • Applicants and recipients remain responsible for disclosing all research endeavors regardless of the version of the forms used including supporting documentation and immediate notification of undisclosed OS

Other Support

- How is Other Support Used?
- What is Other Support?
- When?

What is Other Support?

Other Support is to report support other than the application or award on which you are reporting. "Neither the application under consideration nor the current PHS award for this project should be listed as Other Support."

Sometimes referred to as "current and pending support"

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

How is “other” or “current and pending” support information used?

Understand resources available to researchers in support of their research endeavors (including grants and contracts, and externally supported personnel, lab space, materials and other resources)



Identify and avoid potential scientific and budgetary overlap with the proposed research, domestic and foreign



Investigator and staff commitment, and the potential for over-commitment (effort greater than 100%)

- Applicable regardless of resource location and whether the support is monetary or “in-kind” and/or direct to the researcher
- 

Any foreign resources that meet the definition of a foreign component have received appropriate prior approval

When is Other Support Disclosed?

Proposal

- All appointments, domestic/foreign, FT/PT, honorary, etc (Biosketch)
- Foreign component

Just-in-Time

- All sources of support
- In-kind including visiting scholars funded by foreign sources
- Foreign contracts for appointments/employment of SKP

RPPR Other Support & Personnel

- New appointments
- New support
- New in-kind
- New collaborators
- New visitors

During Project/Prior Approval

- New Foreign Component
- Previously undisclosed other support (immediate disclosure as soon as known)



NIH Other Support

The Details

Key “Take-aways”

- ▶ Each person submitting OS or Biosketch read new instructions and reach out to OSP with questions (or via department grant manager)
- ▶ NIH focus is on other “research” support. Lines can be blurry in terms of outside activities and what is research. Good indicator might be authorship on a publication
- ▶ Uncompensated resources that support your research are required to be disclosed
 - ▶ domestic or foreign, in-kind or paid for by another source, examples include:
 - ▶ Graduate student or Fellow working in your lab who is paid from a foreign fellowship
 - ▶ Visiting faculty member who works in your lab but is paid by a home institution (foreign or domestic)
 - ▶ Donated samples or in-kind analysis performed by another lab that supports your research
- ▶ NIH expects these forms to be used now (rejection won't occur until Jan 25, 2022)
- ▶ Less administrative work to convert to the new forms now
- ▶ Faculty don't have to sign the OS until it is required in January (but it's okay if they do sign them)
- ▶ Other institutions need to accept the new format and not ask us to use the old format for both Biosketches and Other Support
 - ▶ Loop in OSP to assist
- ▶ Consider leveraging SciENCv that can create Biosketches in multiple Sponsor formats
 - ▶ NIH new biosketch format is in SciENCv
 - ▶ NIH new Other Support format will be released in late fall

NIH Other Support: Who??

- ▶ Senior/key personnel—those devoting measurable effort to a project

Who Not?

*Not for Program Directors, training faculty, and other individuals involved in the oversight of *training grants* since applicable information is collected in other sections of a training grant application.

*Not for individuals categorized as Other Significant Contributors.

Other Support: What?

- ▶ All current projects and activities, even if only in-kind (e.g. office/laboratory space, equipment, supplies, employees).
- ▶ All research resources including, but not limited to, foreign financial support, research or laboratory personnel, lab space, scientific materials, selection to a foreign “talents” or similar-type program, or other foreign or domestic support must be reported.
- ▶ Total award amount for the entire award period covered (including facilities and administrative costs), as well as the number of person-months (or partial person-months) per year to be devoted to the project by the senior/key personnel involved.

NIH Other Support: *What?*

- ▶ All positions and scientific appointments domestic and foreign including affiliations with foreign entities or governments
- ▶ *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:
 - ▶ foreign and domestic entities
 - ▶ financial support for laboratory personnel
 - ▶ high-value materials not freely available
 - ▶ 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 supported by an outside source.

NIH Other Support: What Not?

- ▶ Training awards, prizes, or gifts*.
- ▶ 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.
- ▶ Start-up packages from the institution**
- ▶ F&A reimbursement
- ▶ In-kind contributions such as technology, chemicals, etc. if intended for use on the project being proposed to NIH in the application, the information must be included as part of the Facilities and Other Resources or Equipment section of the application and does not need to be replicated on Other Support

*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 Other Support.

**Start-up from outside organizations should be disclosed

Effective May 25, 2021, NIH requires the following:

- ▶ Supporting documentation, which includes copies of contracts, grants or any other agreement 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 the contracts, grants or other agreements are not in English, recipients must provide translated copies.
- ▶ Immediate notification of undisclosed Other Support. When a recipient organization discovers that a PI or other Senior/Key personnel on an active NIH grant failed to disclose Other Support information outside of Just-in-Time or the RPPR, as applicable, the recipient must submit updated Other Support to the Grants Management Specialist named in the Notice of Award as soon as it becomes known.

Other Support FAQ:

What should be used for dollar amounts for listing awards?

- ▶ 7. Should the dollar amounts reflected on the Other Support document reflect annual total cost or annual direct cost only?
- ▶ Other Support submissions should provide the total award amount, direct and indirect, for the entire project period (e.g. competitive segment for NIH grants), not just the annual budget period.
- ▶ 17. When a researcher is including information on a subproject in Other Support, should the researcher provide the total award amount for the overall award, or only the subproject?
- ▶ For subprojects, recipients should provide the project number and PD/PI name for the overall project. All other information, including total award amount and person months, for the subproject only.
- ▶ 18. When a researcher works on a subaward to an NIH grant that is awarded to another institution, how should that information be included in Other Support?
- ▶ The researcher should provide the project number, PD/PI name for the prime award. All other information, including the total award amount and person months, should be specific to the subaward.
- ▶ 23. When providing the total award amount for an NIH funded grant project, should the researcher provide what was requested in the initial application, or the amount of funding listed on the current Notice of Award?
- ▶ Researchers should list the total award amount, direct and indirect, for the entire project period, based on the most recent Notice of Award specific to that project.

Updated NIH Biosketch

- ▶ Per 3/12/2021, 4/28/21 Notices and Blog 5/5/21
- ▶ Use of the updated format pages will be required for applications and Research Performance Progress Reports (RPPRs) submitted for due dates on or after January 2022
- ▶ During the transition to the new Biosketch format, NIH will not withdraw applications that include the previous Biosketch format.
- ▶ Beginning with applications submitted on or after January 25, 2022, failure to follow the appropriate Biosketch format may cause NIH to withdraw your application from consideration.
- ▶ NIH expects a compliant biosketch for due dates on or after May 25, 2021.
- ▶ Applicants and recipients remain responsible for disclosing all research endeavors regardless of the version of the forms used

Specific Changes to Biosketch Instructions - Updates

- ▶ Instructions for a Biographical Sketch
- ▶ Personal Statement updated to read:
 - ▶ Briefly describe why you are well-suited for your role(s) in this project. Relevant factors may include: aspects of your training; your previous experimental work on this specific topic or related topics; your technical expertise; your collaborators or scientific environment; and/or your past performance in this or related fields, *including ongoing and completed research projects from the past three years that you want to draw attention to (previously known as research support)*.
- ▶ Positions, *Scientific Appointments*, and Honors updated to read:
 - ▶ 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)*. High school students and undergraduates may include any previous positions. For individuals who are not currently located at the applicant organization, include the expected position at the applicant organization and the expected start date.
- ▶ D. Scholastic Performance updated to remove 'Research Support'. Section D is solely present on the fellowship version of the Biosketch, and no longer includes research support, only Scholastic Performance.