

NH "Other support" changes	"Other support" on and prior 2018	Reminders of NH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components	Comment and Confusions to NOT-OD-19-114	Upcoming Changes to the Biographical Sketch and Other Support Format Page for Due Dates on or after May 25, 2021	Comment and Confusions to NOT-OD-21-073	Implementation of Changes to the Biographical Sketch and Other Support Format	Comment and Confusions to NOT-OD-21-110
Notice number	PHS 388 part II	NOT-OD-19-114		NOT-OD-21-073		NOT-OD-21-110	April 29, 2021
Issue date	On and prior 2018	July 10, 2019		May 21, 2021			
URL links	https://grants.nih.gov/grants/funding/gh388_r/e06-2006/jan388.html	https://grants.nih.gov/grants/notice-files/NOT-OD-19-114.html		https://grants.nih.gov/grants/notice-files/NOT-OD-21-073.html		https://grants.nih.gov/grants/notice-files/NOT-OD-21-110.html	
Effective date	Provide active support for all key personnel. Other Support includes all financial resources, whether Federal, non-Federal, commercial or institutional, available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts, and/or institutional awards. Training awards, salaries, or gifts do not need to be included.	The intent of this notice is to remind the extramural community about the need to report foreign activities through documentation of other support, foreign components, and financial conflict of interest to prevent scientific, scholarly, or commercial overlap. NH has long required full transparency for all research activities both domestic and foreign and does not consider these clarifications to be changes in policy.	These are clearly changes of policy, not just clarifications. Previous guidance offered for "other support" was used for the purpose of awarding grant awards, whether multiple grants came from the same or different funding agencies. But this new guidance clearly creates additional reporting requirements, and it is not clear why NH emphasizes that these are not changes of policy. The emphasis on "clarification" made it confusing for universities, who did not know whether their previous reporting was suddenly inadequate. The result was significant inconsistency between university and university, colleges and schools within the same university, and even faculty from the same academic unit. There is no standard reporting format or list of reporting requirements. Everyone is interpreting these guidelines in their own way. Unfortunately, NH also seems to be interpreting these guidelines in their own way, arbitrarily deciding when violations have occurred and who should be investigated.	Format re-organized to separate funded projects and in-kind contributions	The changes are required in two months, which is very difficult for universities to implement. Stakeholders should be consulted to establish realistic deadlines?		
Changes	There is no "form page" for other support information on other support should be provided in the format shown below, using continuation pages as necessary. Include the principal investigator's name at the top and number consecutively with the rest of the application. The sample below is intended to provide guidance regarding the type and extent of information requested.	1. Other grants from other institutions or funding agencies need to be reported in the previous guidance. But everyone understands that these reports are intended to avoid overlaps with current grant applications. For instance, institutional support, such as startup, internal pilot funding etc. are not usually included in this category 2. There is no requirement to report other appointments in the form. The understanding was that since faculty usually have 9 months appointment, they are allowed to work in other institutions in the summer as long as their employers have policy to govern these arrangements. In addition, each PI usually only have 10-50% effort in the NH grants, which is ensured by the applicant institutions. 3. Each university has its own internal report policy with various thresholds for reporting for conflict of interest and conflict of commitment. Some universities clearly stated that "An employee is not required to obtain written approval nor provide any type of notification prior to engaging in compensated outside activities that do not related to the investigator. 4. The term, "Direct Support" is relatively easy to interpret and does not require researchers to search back in their histories for any potential affiliations that might be problematic.	Other support inclusive of 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 research and/or financial support from all foreign and domestic entities, including but not limited to, financial support for laboratory personnel, and provision of high-value materials that are not freely available (e.g., biological, chemical, model systems, technology, etc.) without prior approval. — Information must be provided about all current support for ongoing projects. Interactions of whether such support is provided through the applicant organization, through another domestic or foreign organization, or is provided directly to an individual that supports the senior/key personnel's research efforts.	Signature required for PI and Co-PI	The reporting required for in-kind resources is confusing. Please see below.	Effective date is changed from MAY 25, 2021 to January 25, 2022	This change allows for more time to implement changes and is extremely important
	For instructions and information pertaining to the use of and policy for other support, see Other Support in the PHS 388 Part II: Policies, Assurances, Obligations, and Other Information. Note effort devoted to projects must now be measured using person months. Indicate CM, academic, and/or summer months associated with each project.	Report of current projects and activities that involve senior/key personnel, even if the support received is only indirect (e.g., infrastructural 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 "lab site" or similar-type program, or other foreign or domestic support must be reported.	This is clearly a change of policy. These were not included in the previous guidelines for "other support". Previously, the guidelines only asked if there were grants that overlap with the current applications. It is not clear why NH states this is not change of policy.	Consulting agreements, when the P/PI or other senior key personnel will be conducting research as part of the consulting activities	The distinction between support that is "in-kind" versus "Facilities and other resources" is also problematic. NH requires that all labs have to share their reagents, models, etc. with others if these reagents and models are funded by NIH. The specific contracts also have other reagents, cell lines, vectors, and other materials between labs, which is critical for open fundamental scientific research. These are "high value" materials since reagents could not be performed without the sharing. Labs in the same institution also routinely share other lab equipment and materials for collaboration, on a weekly basis. Many labs who collaborate on a project are supported by a variety of grants, but if of these grants need have NIH's about expenses to record of this sharing and it would significantly increase the reporting burden for researchers and universities. Combined with the threat of prosecution if disclosures are not complete, these requirements will be the type of discourage collaborations among labs within the same university, among different universities in the same country, and among labs in different countries.		
	The form requires only 1. Name of individual, 2. Active funding grants, 3. person months, 4. previous appointments, 5. summer, 6. total person months, 7. the name of the project, 8. unique identifier for each website.	Foreign Component: 1. performance of work by a researcher or recipient in a foreign location, whether or not NIH grant funds are expended; 2. performance of work by a researcher in a foreign location employed or paid for by a foreign organization, whether or not NIH grant funds are expended.	In-kind reporting was not part of previous disclosure requirements. This is clearly a policy change.	In-kind contributions, e.g. office/lab/equipment, equipment, supplies, or employees or students supported by an outside source. If the time commitment or dollar value of an in-kind contribution is not readily ascertainable, the recipient must provide reasonable estimates.	Students may be supported by numerous sources, including fellowships from foundations, from endowment, or from teaching. A PI has no way of knowing the sources of financial support of students in the laboratory who are not directly supported by the PI, especially students who may be short-term interns, who move between NIH-supported and non-NIH projects, or who play a more peripheral role.		
	If a recipient determines that a portion of the project will be conducted outside of the U.S., the recipient then will need to determine if the activities are considered significant. If both criteria are met, then there is a foreign component. If an activity does not meet the definition of foreign component, a measure of research is being conducted within the United States, but there is a non-U.S. resource that supports the research of an investigator and/or researcher, it must be reported as other support.	This notice also reminds the extramural community of the requirements in 42 CFR Part 50, Subpart F, Objectives of Research. This regulation, also known as the FCOI regulation, specifies the minimum requirements for investigators to disclose to their institution their significant financial interests.	Previously the grant application asked for the performance location (domestic or foreign), with the understanding that if grant-funded work was not carried out in a foreign location, that location did not need to be reported. The current grant application goes significantly further, requiring that all performance locations need to be reported even if the current grant will not be performed in foreign locations. This is clearly a change of policy.	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.	Business Change 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 fixed academic, professional, or institutional appointments whether or not remunerated is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary). High-impact students and undergraduate 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.	All appointments should be reported. However, multiple appointments should not be a ground for suspicion or concern, especially as changes in the economy and the structure of universities have made it more likely that researchers will hold multiple appointments. Many appointments are only 3-6 months and are meant to be combined with other appointments, including those at foreign institutions.	
Suggestions	(1) NH needs to be transparent and consistent about changes to reporting requirements, which have caused a huge amount of confusion in the scientific community. This is especially true as NH has shown willingness to prosecute researchers for minor mistakes in disclosure statements.						
	(2) NH needs to seek input from universities when they issue new guidance. Just as government agencies announce a "comment period" to seek input from the public, where regulatory policy (for instance), is being considered, NH and other granting agencies should consult with stakeholders.						
	(3) NH needs to separate its functions from those of the FBI if there is espionage or intellectual property theft, the FBI should be involved. However, FBI should not be called in to investigate administrative errors, especially when guidance is so vague and different interpretations exist.						
	(4) Reporting on in-kind resources (reagents, equipment, etc.) needs to be reconsidered since it is not clear what should or should not be included. NH requires all labs to share reagents, models, cells and animals with other labs if they are generated using NH funds. Collaboration using other lab equipment or model systems occurs on a weekly basis in every lab. Furthermore, the scientific community also routinely shares reagents and other material with different labs for collaborations. It is impossible to track and report all of these in-kind resources. The in-kind resource reporting requirement contradicts with common scientific research practice.						
	(5) In-kind financial support needs to be specifically defined in terms of what should or should not be reported, with more clarity about whether personnel in peripheral roles also need to report the support they receive.						
	(6) While all of a PI or CO-PI's institutional appointments need to be reported to NH, the NH must also acknowledge the ubiquity of researchers with multiple appointments. Faculty and researchers are more and more likely to have several 3-9 month appointments in both US and foreign institutions. As long as the effort they report for an NH grant is consistent with their effort at the institution(s) that administers the grant, and they are not in violation of their institution's conflict of interest/conflict of commitment policies, they should not be penalized or prevented from taking part in NH funded research.						
	(7) Other grants of the PI and Co-PI should be reported to NH and overlap should also be reported. However, if these grants (regardless of which institutions) have no overlap with NH grants and if PI's effort is within their percentage of effort (with total effort less than 100% effort), the PI should not be penalized as NH currently does.						