NIH Other Support: Harvard FAQs

Please review the National Institutes of Health (NIH) Frequently Asked Questions (FAQs) on Other Support. The Harvard responses below include requirements and instructions effective for due dates on or after January 25, 2022 and are meant to supplement the NIH FAQs.

Note that Other Support documents must be reviewed and authorized by an AOR (authorized organizational representative) in your school’s central submitting office (OSP, HMS ORA, or SPH SPA) prior to submission to NIH or to the prime submitting/awardee institution when Harvard is a subrecipient. Therefore, JIT and RPPR requests for all awards, including those where Harvard is a subrecipient under an NIH prime award, must be entered into GMAS for review, in accordance with your school’s/submitting office’s deadline policy and procedures.

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OTHER SUPPORT: SUMMARY OF CHANGES

Clarifications and new requirements

- Research consulting. Inclusion of consulting as Other Support, when the individual will be conducting research as part of the consulting activities. Note: Harvard researchers must update disclosure information in the University OAIR (Outside Activities and Interests Reporting) system to include all outside activities.
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- **Foreign agreements.** Unredacted copies of contracts, grants, or other agreements specific to senior/key personnel foreign appointments and/or employment with a foreign institution for all foreign activities and resources that are considered by NIH to be other support must be attached to Other Support pages as supporting documentation. If the agreements are not in English, recipients must also provide translated copies. (Machine translations, such as Google Translate, are acceptable.)

- **Clarification on gifts vs. in-kind 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.

- **Revised Other Support format.** NIH has issued a new form to be used for due dates on or after January 25, 2022. The new Other Support form page will be utilized for all submissions (Just-in-Time/JIT and Research Performance Progress Report/RPPR). It includes the signature block for certification from the PD/PI or key personnel.

- **Signatures.** Each reporting individual (PD/PI or other senior/key personnel) must electronically sign their respective Other Support form as a PDF prior to submission, to certify the accuracy of the information submitted. Delegation of signatures is not allowed.

- **Undisclosed other support.** Immediate (within 30 days of discovery) notification to NIH of previously undisclosed other support is required.

**CONSULTING ACTIVITIES**

Related to NIH FAQ 4, “Do outside consulting activities have to be reported in Other Support?”, does consulting include the consulting that faculty perform outside of Harvard under the 20% rule?

Per NIH, when the researcher will be conducting research as part of the consulting activities, they must report it as Other Support, regardless of whether it’s considered an outside activity to Harvard. Per the response to NIH FAQ 4, “Consulting that falls outside of an individual’s appointment, separate from institution’s agreement, must be disclosed as Other Support.”

What about summertime effort?

Summer effort that includes research still needs to be reported as Other Support. NIH does not make a distinction among activities that occur “outside” of university effort.

What kinds of consulting activities could be considered “research” for the purposes of inclusion in Other Support?

*Conducting research as part of consulting is to be responsible for the design, conduct or reporting of Research regardless of title or position (i.e., an Investigator).* This definition does not normally include service on scientific or clinical advisory boards or more general scientific consulting unless the Covered
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Individual is anticipated to make a direct and significant intellectual contribution to a specific Research project for the entity.

Harvard’s definition of Conducting Research is to be a Project Director, Principal investigator or to otherwise be responsible for the design, conduct or reporting of Research regardless of title or position (i.e., an investigator). This definition does not normally include service on scientific or clinical advisory boards or more general scientific consulting unless the Covered Individual is anticipated to make a direct and significant intellectual contribution to a specific Research project for the entity.

Does the research need to be related to their Harvard research?

NIH 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. Therefore, we interpret “related to your research” to refer to all research, not just Harvard research.

For research consulting that needs to be included as Other Support, how do we report time and dollar amount? Does effort need to be listed?

NIH FAQ 22 clarifies that consulting should be estimates for the amount paid, rather than time and effort reflected in calendar months. Therefore, it will not count towards the 12 calendar months of effort. Note that if the consulting agreement is with a foreign institution, the agreement (and an English translation) should be appended to the Other Support document.

Where exactly on the Other Support pages should consulting activities be listed? Is this a separate section of the document?

Research consulting activities should be included under the “Other Resources/Support” header of the Harvard NIH Other Support template until NIH transitions to the use of SciENcv to generate Other Support (at the earliest, FY2022).

SUPPORTING DOCUMENTATION

NIH NOT-OD-21-073 states: “For Other Support submissions that include foreign activities and resources, recipients are required to submit copies of contracts, grants or any other agreement specific to senior/key personnel foreign appointments and/or employment with a foreign institution as supporting documentation. If they are not in English, recipients must provide translated copies. This supporting documentation must be provided as part of the Other Support PDF following the Other Support Format page.” What does this guidance mean?

If a researcher has a grant, contract, or other type of agreement with a foreign entity, and if the agreement involves either (i) the conduct of research or (ii) the provision of resources to support the individual’s research (per the NIH definition of Other Support), the foreign agreement and an English
translation of the agreement must be appended to the end of the researcher’s Other Support document, in addition to including the activity and/or resource in the researcher’s Other Support submission. NIH will accept machine-read translations.

**Do we need to attach both the original (foreign language) copy of the agreement, as well as the translated version?**

Yes. NIH requires the submission of foreign contracts, grants, or any other agreements specific to senior/key-personnel foreign appointments and/or employment with a foreign institution, as supporting documentation to the Other Support submission. If the original contract is not in English, we must also provide a version translated into English. NIH further clarifies that it will accept machine-read translations. Any costs associated with producing such translations are not typically allocable to a specific NIH grant project and are therefore not allowable as a direct cost.

**Can we just submit an agreement/supporting documentation to NIH the first time we submit Other Support on/after January 25, and then only attach new agreements as they are signed? (And will one NIH institute “share” the agreements with all NIH institutes?) Or will we need to attach all agreements to the Other Support indefinitely, at least until a specific agreement period has ended?**

To ensure that we meet the NIH supporting documentation requirement, we should attach the foreign agreement(s) with each Other Support submission, until the period covered by the agreement has ended.

**If a PI receives funding from a foreign sponsor, will we need to include the contract as backup if the work is being performed in the U.S.?**

If the research project funded by a foreign sponsor is a sponsored project in GMAS, it should be reported on Other Support under the Projects header; the sponsored award agreement does not need to be attached as supporting documentation. However, an agreement providing funding from a foreign entity directly to the researcher (as an outside activity, not a sponsored award to Harvard), for the purpose of conducting research or that otherwise provides resources in support of the individual’s research, must be included in other support and a copy of the agreement attached to the individual’s Other Support.

**What if the supporting documentation is marked “Confidential”?**

If the agreement is marked confidential, we still need to include it as supporting documentation and append it to the individual’s Other Support document, as long as it meets the criteria outlined in the section above and in NOT-OD-21-073. Per FAQ 8, “NIH handles confidential and sensitive information in accordance with our cybersecurity requirements and requires submission of complete documentation.”
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What if a faculty member signs a Non-Disclosure Agreement (NDA) with an outside company that precludes disclosure of the terms of their engagement? Do they still need to provide the associated foreign contract/agreement to NIH?

Yes. NIH states in FAQ 8, “NIH needs access to all information necessary to make an informed judgement about possible scientific, budgetary, or commitment overlap and to make an informed judgment about management of possible significant financial conflicts of interest. NIH handles confidential and sensitive information in accordance with our cybersecurity requirements and requires submission of complete documentation.” Additionally, NIH has made it clear that signing an NDA does not supersede the requirement to submit an agreement.

If we sign Material Transfer Agreements (MTAs) with foreign institutions, do we need to provide these as supporting documentation?

No, they do not need to be included as supporting documentation. If, however, the MTA(s) governs the receipt of materials that are related to your research and are both high value and not broadly available, you need to report such in-kind resources on your Other Support.

Anything I receive from an international collaborator (e.g., seawater samples, leftover lab reagents after a cruise) might be “in-kind support”?

Only those resources that are related to your research, and which are both high value and not broadly available, need to be reported as in-kind support.

SIGNATURES

The key personnel’s electronic signature is required on all Other Support submissions beginning on January 25, 2022. What constitutes an electronic signature?

Researchers may use the electronic signature of their choice. Adobe PDF e-signatures are Harvard’s preference.

Can the PI/key personnel provide a handwritten (wet) signature on their Other Support?

No, NIH will only accept electronic signatures. The signature cannot be typed in or signed with ink. Additionally, scans of wet signatures are not permissible.

If the PI (key personnel) approves, can the grants manager apply the PI’s electronic signature to the Other Support?

No, the PI must review their finalized Other Support document and electronically sign the document themselves to ensure that the information on the document is complete and accurate. Having anyone else sign their Other Support would be fraudulent.
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After the researcher electronically signs their Other Support document, it needs to be flattened as a PDF prior to submission, and the University must maintain the original electronic signature and make it available upon request by NIH. How do we flatten the PDF? Where do we store the version of the document with the original certified electronic signature?

Flattening means that all embedded electronic information is removed. This can be accomplished by selecting “Print to Adobe PDF” or using a snipping tool to take a screenshot that can be converted to a PDF. Both the original certified version and the flattened version will be stored in GMAS.

Will the Harvard submitting office (OSP/ORA/SPA) require the researcher’s e-signature prior to reviewing the Other Support document? Or should investigators wait until the submitting office has reviewed their Other Support before they sign it?

The researcher submitting Other Support should sign the document after it has been reviewed by their department staff and central submitting office in case revisions need to be made. The submitting researcher should sign after review, just prior to submission to NIH. If anything changes on the Other Support, the document will need to be re-signed.

EFFORT

Can you confirm whether person months should be listed per budget period for NIH Other Support (unlike NSF, which allows us to use fiscal years for reporting effort)?

Yes, NIH Other Support should reflect the individual’s actual effort for the award’s current budget period, expressed in person months (calendar, academic, or summer). For pending awards, list the proposed effort for the first budget period.

Do Harvard PIs/Key Personnel need to include their effort on Billing Agreements with affiliated institutions on their Other Support?

Yes. Incoming sponsored billing agreements, which are set up in GMAS, provide a mechanism for the reimbursement of salary and fringe for Harvard employees/trainees working at an affiliated institution (e.g., BCH, MGH, BIDMC) on a sponsored project. If a Harvard PI/Key Personnel is performing research at an affiliate institution via a billing agreement, their effort on the billing agreement must be included in their Other Support, under Projects/Proposals.

What do we do about 0% effort projects? NIH doesn’t allow this, but some projects don’t have effort and NSF says we can’t cost share.
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NIH requires that the reporting individual estimate their level of effort for the work being performed.

**GIFTS**

The definition of gifts seems to have narrowed for NIH. What gifts need to be reported now?

Do researchers report gifts in Other Support? No, gifts should not be reported in Other Support. Reminder, gifts are resources provided where there is no expectation of anything (e.g., time, services, specific research activities, money, etc.) in return.

Note that internal awards with a designated research purpose, even if originally funded from gift sources, should be reported as Other Support consistent with other sponsored funding.

Would funding awarded under gifts to Harvard be considered “gifts” or should they be listed as support (e.g., Blavatnik Accelerator, Deans’ Awards)?

If the funding was originally from a gift source but is awarded through an internal competition to support a research project (there’s a designated research purpose and a time period associated with it), then it should be reported as Other Support under the header “Projects.”

Should investigators list gifts on Other Support if the gifts specifically support their research endeavors?

NIH has indicated that gifts, which are given whereby the donor is not receiving anything in return or in exchange, should not be listed on Other Support. Awards which do stipulate that something (e.g., time, services, specific research activities, money, etc.) is to be provided in return are not true gifts and should be reported in Other Support regardless of Harvard’s internal classification.

Sometimes a PI discusses a project with a potential sponsor which is expected to be a grant submission, and at the last moment the sponsor says they can award it as a gift. In the PI’s mind the funds are for a specific project, but the legal agreement is for a gift. Do we need to disclose gifts with this sort of history?

If it has any terms or conditions that disqualify it from being designated a gift by the University, such as a time commitment, it should be entered into GMAS (as NG) and will need to be reported as Other Support if the funds are used to support research activities.

**IN-KIND CONTRIBUTIONS**

Should in-kind contributions be listed for ALL projects in the PI’s/Key Personnel’s lab, or should they list only in-kind contributions that benefit the specific project being reported on?
Per NIH FAQs on In-Kind Contributions (FAQ 1 and 2),
At PROPOSAL submission: if the in-kind contribution is intended for use on the project being proposed, 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 during JIT.

At JIT/RPPR: if the in-kind contribution was not included in the proposal for the project for which it is used, include it in the Other Support at JIT/RPPR. Note that Harvard recommends that Other Support pages include all in-kind contributions, even those which were included in the application as Facilities & Resources or as Equipment.

Do Grants Managers have direct access to all information that will need to be listed as In-Kind Support and Other Resources/Support for their PIs?
In most cases, grants managers will not have direct knowledge of all support that may need to be reported as In-Kind Contributions or Other Resources/Support. The PI will need to provide this information directly (either by entering the information on their Other Support page themselves or sending their grants manager the information that needs to be added).

Personnel as in-kind resources (e.g., students, post-docs, collaborators)
If a faculty member says an externally funded post-doc, or visiting scholar is conducting their own research, rather than the faculty member’s research, does their external funding need to be reported as other support?
As stated in NIH FAQ 7, “If the post-doc or graduate student is performing research activities in support of the PD/PI or other senior/key personnel’s research endeavors, then their support must be reported as an in-kind resource. If the relationship is solely a mentor/mentee arrangement, with no research activities, then it is not a resource, and does not need to be reported.”

Should externally funded individuals be listed as pending in-kind resources before their appointment starts?
If the individual’s appointment date is known, you may list them as a Pending in-kind resource on Other Support. Per the NIH instructions for Other Support, the In-Kind Contributions section says to “provide Active and Pending In-Kind contributions for all senior/key personnel.”

If such individuals are self-funded, are they still considered in-kind resources?
Yes, and they must be reported as such.

If externally funded personnel are from a nearby hospital, other university, etc. with which they maintain a primary affiliation, and they have a Harvard appointment with a lab, should they be included in the Harvard PI’s other support?
Yes.
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Is there a minimal amount of time in the lab that is not considered significant enough to include?
NIH has not provided a minimum level of time/effort required for reporting as other support.

Are postdocs funded through an NIH F or T training grant an in-kind resource when I’m not the PI of the training grant?
If the postdoc is performing research activities in support of your research endeavors (while being supported by an F or a T), their support must be reported as an in-kind resource on your Other Support. You have the choice to report either their total effort on your research or an estimated dollar value of their contribution. Harvard’s preference is to list effort rather than dollar value.

Do students (masters or doctoral) conducting work in my group as part of their educational program need to be listed as in-kind resources? Does the funding source for doctoral students matter as to whether they are an in-kind resource or not? For example, does it matter whether the doctoral students are funded by a training grant?
The key factor is whether the students are contributing to your research endeavors and being paid from funding sources other than YOUR research support. When this is the case, their support of your research must be reported as an in-kind resource on your Other Support.

Are postdocs that are funded through a combination of external and internal funds an in-kind resource? If so, is all their time in-kind or only the externally funded portion of their time? Also, does the source of the externally funded time matter (e.g., a Fulbright scholar vs. a foreign government or a foundation or private entity)?
See answers above. You would list their contribution to your research endeavors as in-kind support, if they are directly contributing to your research endeavors but are not funded directly from YOUR sources of research support (i.e., your grants they are working on).

NIH FAQ 12 states, “Other Support includes...research collaborations that directly benefit the researcher's research endeavors.” Would these unfunded collaborations be considered “in-kind” support, or another category? Does a value or effort for the collaborator need to be included?
If a domestic or foreign collaboration is related to or in support of the submitting PI/Key Personnel's research, it is considered a form of in-kind other support. The collaborator’s name and location should be identified on the Other Support document, along with any other applicable information: summary of their contribution, estimated value of the contribution (or effort), etc.

Does participation in unfunded projects that result in papers where I am a co-author need to be reported as in-kind resources and if so, how should such support be reported?
Any such collaborations should be discussed with your Grants Manager. These situations are not straightforward and require consideration on a case-by-case basis in order to evaluate if the collaboration is related to or in support of your specific research endeavors. If the collaboration does provide resources related to or in support of your research (e.g., analyzing samples and sending the results to your lab for use in your research), then such support should be listed as in-kind, indicating the approximate value of the collaborator’s efforts to your research.

If a collaborator is providing a unique resource that is valuable to the project, should that collaborator be considered Key Personnel?

The determination of who is designated as Key Personnel should be based on the NIH definition. The unique resource should be reported as in-kind support. Note: if the collaboration/collaborator is foreign, a determination needs to be made as to whether it constitutes a foreign component on an active NIH award. See Do I Need to Seek Approval for an NIH Foreign Component?

Would Other Significant Contributors (OSCs) be listed as "in-kind" on Other Support, as unfunded collaborators?

No, the individual doesn’t need to be included since NIH OSCs do not have measurable effort on the award. However, if the OSC provides a resource (e.g., tissue samples, data) to the PI, the resource should be reported as Other Support if it meets the criteria for being high-value and not freely available to other researchers.

How and where do we disclose foreign collaborations for something like for the exchange of samples (either to the collaboration or to us) to be analyzed and how far back in time do disclosures need to go?

If the collaborator is key personnel, the collaborator would need to submit a full Other Support page. If the resource (samples) are in-kind contributions (i.e., Harvard is not purchasing them) and meet the criteria of being high-value and not freely available, they would be listed in the In-Kind section of the Harvard PI/Key Personnel’s Other Support. NIH FAQ 7 states that materials (in this case, samples) provided within the past 3 years that are still in use must be included in Other Support. If materials (samples) are provided from Harvard to a collaborator, this resource should be included on the collaborator’s Other Support.

Valuation of in-kind contributions

How do we capture the value of students, trainees, and other externally-funded personnel working on projects?

List their available effort in person months, rather than their salary, stipend, or other dollar value.

How are we defining “high-value” for in-kind resources?
Information on high-value materials received from collaborators must be included within the in-kind contributions section of Other Support. Include the source, a summary of the in-kind contribution, and the estimated value, if available. For this purpose, Harvard defines “high-value” as being uniquely valuable to your research or otherwise having a market value at least equivalent to the capital equipment threshold, currently $5,000 per item. Should this change, we will provide updates.

How are we defining “not freely available” or “broadly available” as it applies to in-kind resources?

NIH FAQ 22 states “recipients must use professional judgement to determine whether a resource is made broadly available and apply these principals consistently across the institution.” Harvard defines “not freely available” to the research community as a resource/contribution that is available only to the individual, or to the individual’s lab/group/office. Resources which are publicly available, or broadly available to the research community upon request, are excluded from this definition.

Does the in-kind resource need to be both “high-value” and “not freely available” in order to be reportable as Other Support?

Harvard’s understanding is that only resources which meet both criteria, i.e., which are high-value and not freely available, need to be reported as Other Support.

What about data or materials that I receive from another institution, including under a DUA or MTA?

Data and materials received from another institution, including under a DUA or MTA, that are both high-value and not freely available should be reported as Other Support. Consistent with the above, data and materials which are publicly available, or broadly available to the research community upon request (notwithstanding that entry into a DUA or MTA is required by the provider), are considered “freely available” and do not be included.

How would a PI estimate the value of a resource?

The PI will need to make a reasonable estimate, which may include comparing the market value of similar resources and accounting for depreciation and any relevant discounts. If a Harvard office could help, e.g., the licensing office or a service center, we recommend utilizing their expertise. If after reasonable diligence the PI determines there is no ascertainable value (i.e., the resource has no market equivalent), the PI may state “No market value.”

NOTIFICATION OF UNDISCLOSED INFORMATION

NIH states that we must notify them immediately upon discovery of undisclosed information. NIH FAQ 11: If an organization discovers that a PI or other Senior/Key personnel on an active NIH grant failed to disclose Other Support information outside of JIT or the RPPR, as applicable, the institution must submit updated Other Support to the Grants Management Specialist named in the Notice of Award as soon as it becomes known.
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How do we meet the immediacy requirement?

The individual disclosing or discovering the previously undisclosed support must notify their contact in their sponsored submitting office (OSP, ORA, or SPA) immediately. Once the submitting office reviews the information and determines the relevancy for a disclosure, an Authorized Organization Representative (AOR) from the submitting office must report it to NIH. Per NIH FAQ 14: It is expected that the AOR will report failures to disclose within no later than 30 days after previously undisclosed support becomes known, in line with NIH’s requirement for prior approvals (outlines in section 8.1.3 of the NIH GPS).

Does this apply only to current activities, or do completed activities also need to be disclosed?

Both. It applies to any undisclosed activity/support if it overlapped with any active NIH award’s period of performance.

If the researcher has a new source of support after submission of Other Support at JIT/RPPR, do we need to resubmit updated Other Support immediately or wait until the next JIT/RPPR is due?

If the change is the addition of a new source of other support, it can be reported at the next RPPR or JIT. If, however, there is a disclosure of support that was already in place for the researcher, and which was omitted from Other Support submitted for a prior JIT/RPPR, it needs to be reported to NIH immediately.

As a Grants Manager, my PI told me to add something to their Other Support. I’m not sure if the item is new, or if it’s older and wasn’t disclosed on previous Other Support submissions. Should I ask them?

Yes, if it’s not clear whether the item your PI is asking you to add to their Other Support is new, or whether it’s an existing source of support that was not disclosed to NIH previously, ask your PI for more information including the dates of the support. If the item is determined to be previously undisclosed other support, notify your central office immediately so they can report it within 30 days of the discovery.

I submitted a RPPR a few months ago but I know that two of the PIs named on the NoA have foreign appointments. Do I have to submit a new Other Support to my NIH grant specialist now?

Contact your submitting office/compliance office to discuss the details and they will assist in determining whether this needs to be reported, how and when. When in doubt, Harvard recommends disclosure when it comes to foreign appointments and activities.

Note that all positions, scientific appointments, and affiliations need to be reported on the Biosketch.

OTHER QUESTIONS
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Who needs to submit Other Support?

I understand Other Support is not required for Program Directors on training grants, but do we exclude submitting Other Support for a training grant Program Director even if they are listed as Key Personnel on a Notice of Award?

Although the Program Director (PI) on an NIH training grant will always be listed as Key Personnel on the notice, NIH has specified that “Program Directors, training faculty, and other individuals involved in the oversight of training grants” are not required to submit Other Support for the training grant.

What needs to be included as Other Support?

As a Grants Manager, what information for Other Support do I have direct access to, and where can I find it?

Grants Managers (GMs) should have access to their PIs’ active and pending sponsored projects submitted by or awarded to Harvard, as these projects should be in GMAS. GMs can access project information using the “Active and Pending Projects” formerly “Current and Pending Support” report located in GMAS, in the person’s profile. The report includes data such as PI name, project/subproject title, major goals (project summary), status (active/pending), award number, source of support (sponsor), project start and end dates, and total award amount. Additional information can be found in the project segment within GMAS.

See GMAS Job Aid on the Active and Pending Projects (Current and Pending Report) here: https://gmas.fss.harvard.edu/current-and-pending-support

What if my PI has awards at other (non-Harvard) institutions? I just discovered that my PI has an award at the Broad Institute, and I’m not sure if it needs to be listed on their Other Support submitted by Harvard.

If your PI has awards and/or other research support at institutions outside of Harvard, that information needs to be included on their Other Support submitted by Harvard. Since project information for projects administered outside of Harvard will not be in GMAS (or on the Current and Pending download from GMAS), the grants manager will need to request the project information from the PI directly, or from the PI’s grants manager at the other institution.

Should the dollar amounts reflected on the Other Support document reflect total award amount or annual direct cost only?

Other Support submissions should provide the total award amount, direct and indirect, for the entire project period (competitive segment for NIH grants), not just the annual budget period.
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Do we need to report the entire award amount on Other Support when Harvard is a subrecipient?

The NIH instructions for Other Support submissions due on or after January 25, 2022 state, “When providing Other Support under a consortium/contractual arrangement or that is part of a multi-project award: Indicate the project number, Name of PD/PI, and source of Support for the overall project. Provide all other information (e.g., total award amount, in person months) for the subproject only.”

Note that Other Support and Biosketches must be reviewed and authorized by an AOR (authorized organizational representative) in your school’s central submitting office (OSP, HMS ORA, or SPH SPA) prior to submission to NIH or to the prime submitting/awardee institution when Harvard is a subrecipient. Therefore, JIT and RPPR requests for all awards, including those where Harvard is a subrecipient under an NIH prime award, must be entered into GMAS for review, in accordance with your school’s/submitting office’s deadline policy and procedures.

When Harvard is a subrecipient, we list only the total costs for the Harvard subaward, not the total costs of the prime award. What about when my PI has a part-of account? Do they list the total cost of the entire Harvard award on their Other Support, or do they just list the total cost of their part-of account (for all years)?

The NIH instructions state: “When providing Other Support under a consortium/contractual arrangement or that is part of a multi-project award: Indicate the project number, Name of PD/PI, and source of Support for the overall project. Provide all other information (e.g., total award amount, in person months) for the subproject only.” If the Harvard part-of account represents a subproject of a multi-project award (such as a program project/NIH P award), the PI of the part-of account should include only the total award amount for their subproject on their Other Support. The entry should indicate that it is a subproject, by listing the name of the main Harvard PI as the PI of the award, and by including an identifier for their subproject (e.g., Project 3) to the end of the award title, or in the goals section.

If the Harvard part-of account is on a standard research project, such as an NIH R01 (not a multi-project award), you should indicate the overall award amount, not just the part-of account obligation. If you do not have this information, please reach out to the PI or GM for the main account or contact your central sponsored office.

Note that the Harvard PI of the main award must report the entire award amount on their Other Support, even if a significant portion of the funding is being distributed to subprojects (subawards and/or part-of accounts).

When we are the Prime institution, how should we advise the subrecipient institutions? Are there differences when Harvard is the subrecipient institution?

All institutions are required to follow the new NIH Other Support requirements and instructions for submissions due on/after January 25th. Harvard’s Other Support template was created to help facilitate this but is not required. Subrecipient institutions should submit signed, “flattened” Other Support PDFs to the prime institution for submission, not “locked” or “secured” versions, as they will not be able to be
flattened and uploaded to NIH systems. When Harvard is the subrecipient institution, we should send the signed, flattened version to the prime institution, and save a copy of the “certified” (pre-flattened) signed version in GMAS for our institutional records.

Do conference grants with no effort requirement need to be included on Other Support?
Grants which provide support solely for conferences and scientific meetings (i.e., which do not support research) do not need to be included as Other Support.

If a faculty member whose primary appointment/employment is at a Harvard-affiliated institution (e.g., DFCI, BWH) is applying for a grant through Harvard, do they need to include their start-up package when they submit Other Support information through Harvard? Or is there an exception for faculty from affiliated hospitals?

NIH FAQ 5 states, “Start-up packages provided to the researcher from the applicant organization are not included in Other Support. Start-up packages from outside organizations, including foreign entities, must be included in Other Support.” There is no exception for faculty at affiliated hospitals; they would need to report their start-up funds at the affiliated institution as Other Support when submitting through Harvard.

Scientific Appointments need to be listed on Other Support. What does NIH consider a “scientific appointment”?

NIH FAQ 17 states, “Applicants and recipients must determine what constitutes a scientific appointment, in accordance with their institutional policies and procedures for tracking and managing outside activities.” Harvard has defined a scientific appointment as any academic or research appointment, including visiting, adjunct or temporary academic appointments, with a university, college, governmental or non-profit research institution and any fiduciary or executive level appointment with a for-profit entity engaged in commercial or research activities of a biomedical nature.

How should advisory board appointments be listed on Other Support?
They should be reported on the Biosketch, but they also need to be disclosed on Other Support if the investigator is conducting research as part of his/her role on the Board, or if they have access to resources for use in their own research endeavors.

Should an individual’s OAIR (Harvard’s Outside Activities and Interests Reporting system) disclosures and their Other Support pages contain the same information?
The Other Support requirements are broader than what is in OAIR, so preparing Other Support may require information from GMAS, OAIR, the DUA-Agreements system, and the PI directly (for information not captured in Harvard systems).
Do investigators need to list outgoing agreements, such as material transfer and data use agreements, on Other Support?

Outgoing material transfer and data use agreements are not included on Other Support unless the agreement also includes a commitment of the investigator’s effort, collaborative research elements, or the investigator is receiving something in support of his/her research in return for use of the materials/data. If the agreement contemplates collaborative activities or the receipt of other resources which support the investigator’s research, such activities or resources should be listed in the In-Kind section of the Other Support.

How should HHMI Investigators report their funding from HHMI on their Other Support document?

Researchers who are employed by HHMI and who receive general support as HHMI Investigators should report the funding as in the following example, listed within the Other Resources/Support section of the Harvard Other Support template:

HHMI Investigator (PI Last Name)                          MM/DD/YY- MM/DD/YY
Howard Hughes Medical Institute                          $1,500,000 DC ($0 IDC)

HHMI is Prof. [Last Name]’s employer and funds are not considered grant support. That said, these funds are used to support [general scope of research] in [Last Name]’s lab.

HARVARD REPORTS

Will the new Harvard Other Support and Activities report that PIs and key personnel will be able to run include all the information needed for In-Kind and Other Resources/Support?

No. The Other Support and Activities report will include active and pending sponsored projects from GMAS, selected outside activities from OAIR, and data use agreements from the DUA system. The report will not include all activities or relationships that may need to be reported on the individual’s Other Support or Biosketch, nor will it include all required information for each type of support/appointment. The reporting individual (PI/key personnel) will need to provide that information directly.

Can PIs delegate access to their grants managers to download the Other Support and Activities report in GMAS?

No, only the reporting individual (PI/key personnel) will have access to download their own report in GMAS, and they cannot delegate access to their grant managers, faculty assistants, or lab staff. However, PIs can opt to download the report themselves and send the report to their grants managers for purposes of assisting with the PIs review and completion of their Other Support form. Reporting
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individuals will need to provide all relevant disclosure information required for Other Support and Biosketches to their administrators, as the report will not include all required information.

Does everything in the Other Support and Activities report need to be included on Other Support?

Not necessarily. The reporting individual (PI/key personnel) will need to determine which items on the report are required to be disclosed as Other Support. The report will contain only currently active items; the reporting individual needs to provide any pending sources of support to their grants manager or add the information to their other support directly.

Additional Questions

Are we using SciENcv for creating Other Support pages?

No, right now SciENcv is only available for use with Biosketches.

Is there a separate Other Support format for JIT and for RPPR as there has been in the past?

For Other Support submissions due on/after January 25, 2022, there is only one format that includes pending and active research support. The same form/format should be used for both JIT and RPPR submissions.

On the Other Support template in the Active and Pending Projects section there is a table that lists “Year.” What Year is NIH specifically looking for here (fiscal year, budget year start, budget year end)?

The Year should be the year that the budget period ends. For example, if your project dates are 3/2021-2/2025, Year 1 would be listed as 2022, Year 2 as 2023, Year 3 as 2024, and Year 5 as 2025.

How will non-Harvard activities or other items not contained in Harvard systems, but which need to be listed on the Other Support, be reviewed and verified during the proposal process?

For non-Harvard activities and other relationships/resources not contained in Harvard systems, we will be relying heavily upon the PIs/Key Personnel to accurately disclose all such other support. In addition to Harvard establishing a process for reviewing all outside foreign agreements that may need to be attached as supporting documentation, the NIH is requiring that the submitting individual sign their Other Support document attesting that the information provided is true, complete, and accurate for all submissions on or after January 25, 2022.

For Section B of the new Biosketch, department/central office personnel may not have access to all appointments a PI/Key Personnel may have, and they are not required to "sign" the Biosketch or the

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current Other Support form. How do we know that researchers are fully disclosing everything that needs to be on the Other Support and Biosketch?

Each Key Personnel is responsible for disclosing/reporting all required information, and the PI is responsible for all information included in the proposal. Each key personnel is responsible for the information reported on their Biosketch. For Other Support submitted on or after January 25, 2022, the NIH requires all Key Personnel to sign their Other Support forms attesting that the information provided is true, complete, and accurate.

If I have a dual appointment with Harvard and one of the Affiliated Hospitals, and through that secondary appointment I get a discount on certain items/services within the Hospital, do I need to list this discount as an in-kind contribution if this is related to my research?

Since this discount would be “broadly available” to all the Hospital appointees using the items/services, this would not need to be disclosed as an in-kind contribution for Other Support.

May we interpret the information shared at the May 20, 2021 RMM (Research Management Meeting) to mean that the 5-day rule will apply to JIT and RPPR responses going forward?

Please follow your school’s deadline policy and procedures. All submitting offices strongly encourage early submission of JIT and RPPR responses for review. For JIT requests in particular, Harvard is working to standardize our approach to requesting additional time from the NIH in those instances where we need more time to review the submission, and any updates to Other Support more specifically.

Where can PIs & Grants Managers find more information and who to contact for help answering questions?

Contact the AOR who reviews Other Support in your school’s central submitting office (OSP, HMS ORA or SPH SPA). If you don’t know who your central office reviewer is, check the OVPR website for general contact information at https://research.harvard.edu/faculty-disclosure-federal-funding-agencies/

Is there training available for faculty?

Yes, there is a 30-minute Informational Module at the following link:

Disclosing Other Support: Guidance for Faculty and Key Personnel

Who is required to complete the Informational Module?

All faculty and Key Personnel are required to complete the informational module if they are listed as a PI, Co-I or Key Personnel on an active or pending NIH or NSF award.

Will there be training for Grant Managers?
There will be a training session on January 10th at the RMM meeting. Details will be sent out in advance. The session will be recorded and posted to the OVPR website for those that can’t make the meeting.