Please review the NIH Frequently Asked Questions (FAQs) on **Other Support** and **Biosketches**. The Harvard responses below are meant to supplement the NIH FAQs, and the NIH FAQs are referenced in some questions.

Contents

BIOSKETCHES

For the Biosketch, should Section D be incorporated into Section A for the May date?

Yes, per the NIH instructions for the new Biosketch form.

Are the updates to Section B of the Biosketch required for submissions due on/after May 25, 2021?

Yes, the NIH views these as clarifications, not new requirements. In addition, Harvard is recommending use of the new Biosketch form, and we strongly encourage use of SciENcv to create or revise the Biosketch.

Can we use the new Biosketch if the Biosketch I am working on has already been converted to the new format?

Yes, Harvard recommends use of the new Biosketch form, and highly encourages use of SciENcv.

What appointments should be listed on the Biosketch?

All appointments, foreign and domestic, should be listed on the Biosketch. If there are appointments or employment with foreign entities, these need to also be listed on Other Support, and as of January 25, 2022 the agreement will need to be attached.

Should a PI list an affiliation with an NIH funded Center at another Harvard school?

Yes, all appointments should be listed on the Biosketch.

Should advisory board appointments be listed on Biosketches?

Yes, they should be reported on the Biosketch and they also need to be listed on Other Support if the individual will be conducting research as part of the appointment.

Should we update Biosketches annually, immediately when there is a change, or is there some other action that should trigger this?

Biosketches should be updated as required per submission. There is not an immediate disclosure requirement for Biosketches as there is for undisclosed items on Other Support.

Will additional SciENcv training sessions be offered for faculty and staff?

Harvard specific training may be developed, but we recommend using the SciENcv online [training materials](#).

OTHER SUPPORT IMPLEMENTATION PLAN

Does Harvard plan to implement all NIH Other Support changes as of May 25, 2021, or will the University implement them by the required date of January 25, 2022?

Effective **NOW**:
- **Research consulting**. Inclusion of consulting as Other Support, when the individual will be conducting research as part of the consulting activities.
- **Clarification on Gifts**. Gifts are resources provided where there is no expectation of anything (e.g., time, services, specific research activities, money, etc.) in return. An item or service given with the expectation of an associated time commitment is not a gift and is instead an in-kind contribution and must be reported as Other Support.
- **Undisclosed other support**. Immediate notification to NIH of previously undisclosed other support is required, effective immediately.

- **OAIR disclosures**. Researchers must update disclosure information in the University OAIR (Outside Activities and Interests Reporting) system to include all outside activities.
- **Foreign agreements**. Researchers should procure copies of their foreign agreements related to research activities or other support/resources and have them translated into English. If NIH requests such agreements as supporting documentation for their review of Other Support, the University must provide the translated agreements, effective immediately.

Effective for submissions due on or after **January 25, 2022**:
- **Attach foreign agreements to Other Support**. 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 provide translated copies.
- **Signatures**. Each PD/PI or 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.
- **Revised Other Support Form.** 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.

Which Harvard resources are available specifically for the changes that need to be made by May 25, 2022?

The OVPR website posted a summary of the changes required as of May 25, 2021, as well as the January 25, 2022 required changes. The post includes a link to the Harvard version of the Other Support form we recommend using now, and a PDF guide with examples and clarifications. It also outlines the changes to the Biosketch with links to SciENcv and the new Biosketch form.

Do we need to attach foreign agreements to Other Support pages as supporting documentation?

We are not required to attach agreements until January 25, 2022. However, if NIH requests an agreement prior to that date, we are required to provide them with a copy. The researcher is responsible for getting the agreement translated into English if the original is in another language. Machine translation (e.g., Google Translate) is acceptable.

What if a faculty member signs an NDA with an outside company? Do they still need to provide the associated foreign contract/agreement to NIH?

Yes. We can redact certain proprietary or confidential information from the foreign agreement before sending it to NIH, but NIH has confirmed that any key information related to the entity, award amounts, time and effort devoted to the activity, scope of work being conducted, etc. must remain included and visible in the agreement. Additionally, NIH has made it clear that signing an NDA does not supersede the requirement to submit an agreement.

Other Institutions are asking for the new Other Support format (including some Affiliates) when Harvard is a subrecipient. Are we having conversations with these institutions?

Yes, the University/Schools are working with the Affiliates, in particular, to try and get us all on the same page. If an institution does request the new format for Other Support, please let your OSP/ORA/SPA office know and try to push back. The new form/format is not required by NIH until January 2022.

Harvard is not using the new forms for Other Support. What should our response be if we are a subrecipient, and the prime requests that we use the new form?

Please contact your submitting office (OSP/ORA/SPA) to discuss.

When we are a subrecipient, can't we reference NOT-OD-21-110 for use of the old form until Jan 2022 with institutions that insist we use the new form?

Yes, you can reference the notice and if that works, great; otherwise contact your submitting office.

Since Harvard is not using the new Other Support form, if we are the prime, will we accept the new form from subcontracting institutions if they have already begun using the new form?

Yes, Harvard will accept either version of the form from our subrecipients.

How are we handling Other Support for Key Personnel on the project outside of Harvard, such as subrecipient PIs?

We are currently working with the Affiliates to try to align how we are reporting Other Support, but we will not ask outside institutions to use the updated forms until they are required. That said, all requirements effective as of May 25th will need to be met by all institutions.

Are we using SciENcv for creating Other Support pages?

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

CONSULTING ACTIVITIES

Related to FAQ 15, "Do outside consulting activities have to be reported in Other Support?", does consulting include the consulting 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.

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 defined as any consulting activity that results in earning authorship* on a publication describing or supporting a research activity, or any consulting activity that meets the definition of research as defined by the Federal Policy for the Protection of Human Subjects (known as the "Common Rule").** Teaching/training in research methods may also constitute research for the purposes of NIH's definition.

*Authorship should be earned and assigned in accordance with the School/Department policies or guidelines on authorship.

**The Common Rule defines research as a systematic investigation – including research development, testing and evaluation – designed to develop or contribute to generalizable knowledge.

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?

Report the time period if indicated on the consulting agreement along with the estimated total dollar amount for the contract. Generally, effort on consulting agreements is listed at an hourly rate, not as person months, so effort would not be displayed on Other Support pages. Note that if the consulting agreement is with a foreign institution, the agreement should be available (and translated to English) in case NIH requests it.

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).

The requirement to attach copies of consulting agreements is not effective until January 2022. However, do we need to disclose these agreements on the Other Support page as of May 25, 2021?

Yes, if the consulting involves research or you are otherwise receiving anything in support of your research endeavors, you need to include it on Other Support pages.

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.

NSF does not allow cost sharing, so this gets complicated, but NIH requires that we estimate the 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?

FAQ 6: **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.

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 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."

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.

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 currently defined, yes, unless it is a purely mentor/mentee activity with no research activity.

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 the new Other Support form, required for submissions on/after January 25, 2022, 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.

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.

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. Harvard will provide more information as soon we get clarification from NIH.

FAQ 27 **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.

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

If co-authorship is anticipated, yes, they should be considered Key Personnel. If not, the collaboration is in-kind support. For example, if a collaborator provides you with a unique sample but is not otherwise contributing to the research in a substantive, measurable way, then he/she would not be considered Key. However, their contribution of the unique, high-value sample is considered 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" in Other Support as unfunded collaborators?

No, the individual doesn't need to be included since OSCs do not have measurable effort on the award, but if they provide a resource 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?

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), they would be listed in the In-Kind section of the Harvard PI/Key Personnel'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. For this purpose, Harvard defines "high-value" as having 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" as it applies to in-kind resources?

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.

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 (until we receive confirmation from NIH) 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.

How would a PI estimate the value of a resource?

The PI will need to make a reasonable estimate. If a Harvard office could help, e.g., the licensing office or a service center, we recommend utilizing their expertise.

NOTIFICATION OF UNDISCLOSED INFORMATION

NIH states that we must notify them immediately upon discovery of undisclosed information. FAQ 4: 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.

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.

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.

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 or activities.

Note that going forward, all positions, scientific appointments and foreign affiliations need to be reported on the Biosketch. However, there will be a transition period in which researchers will need to continue to report these on their Other Support to ensure full disclosure to NIH. Additionally, if a foreign position, appointment, consulting arrangement, or other affiliation with a foreign institution supports the individual's research endeavors and results in a contract or agreement, the NIH has the right to request copies of such agreements (prior to January 25, 2022, at which point copies are required to be provided). Therefore, the researcher should be prepared to have the it readily available and translated into English.

OTHER QUESTIONS

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 Program Director even if they are listed as Key on a NoA?

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?

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 16 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.

How should advisory board appointments be listed on Other Support?

They should be reported on the Biosketch, but they may also need to be disclosed on Other Support if the investigator is conducting research as part of his/her role on the Board.

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 will require information from GMAS, OAIR, and the PI directly (outside of Harvard systems).

Additional questions

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?

This process is currently being worked on, and foreign contracts/agreements will need to be reviewed, but for the most part we will be relying heavily upon the PIs/Key Personnel to disclose all other support; this is why NIH will require that the individual sign their Other Support document for submission 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 current Other Support form. How do we know that researchers are fully disclosing everything that needs to be on the Other Support & Biosketch?

We won't know. The researcher is responsible for disclosing/reporting all required information, and the PI is responsible for everything in the proposal. For Other Support submitted in an RPPR and for Biosketches submitted in an application or RPPR, the PI will sign off in GMAS, which is their certification of the contents of that submission. For Other Support submitted on/after January 25, 2022 due date, the researcher will be required to sign the Other Support form.

Who should faculty talk to if they have questions?

<p style="text-align: center;">**NIH Biosketch & Other Support: Harvard FAQs**</p>

Faculty should address questions to their submitting/compliance office, and/or the individual designated as the point of contact for Other Support questions at their school. It is preferable to have questions in writing so that they can be added to these FAQs, as appropriate.

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. OSP currently does not have a University Area policy for RPPRs but strongly encourages early submission for review by OSP. JIT is different as the NIH regularly requests these back immediately, but Harvard AORs have been notifying NIH when we need more time to review the JIT information, in particular Other Support pages.

Would it be possible to get GMAS updated so that items required for the new Other Support format, such as Completed projects from the last 3 years, are included on the "Current and Pending" Report?

This solution has been discussed recently; we will check with our HUIT GMAS Team on options.

Would it be possible to tweak GMAS to create something else that splits the Other Support information out into the new template similar to what SciENcv does for Biosketches?

We will check with our HUIT GMAS Team, but in FY2022 NIH has indicated that SciENcv will have the Other Support template and we strongly encourage our faculty to utilize SciENcv for both the Biosketch (now) and the Other Support (when available).

I have to submit an updated Other Support page for a PI, for an RPPR due June 1st, will resources be available in time to assist me with making those updates?

We are working to get resources posted as quickly as possible. They all may not be available for the June 1st RPPR, but the slides and FAQ's are available now. Any questions on what should be included can be directed to your submitting office (ORA, OSP, or SPA).

Will the slides from the May 20, 2021 Research Management Meeting be shared?

Yes, the slides will be posted to the OVPR website, and the sessions were recorded and will be posted to the Harvard Training Portal (HTP).