

## Complying with NIH Policy when Completing Grant Applications Current, as of August 3, 2021

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

**August 2, 2021: Additional Clarifications to Biosketch and Other Support Policies Now Available.**

**July 18, 2021: NIH issues updated and new FAQs related to reporting Other Support.**

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

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

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

For more details, please see the memo regarding the Update on NIH Requirements from the Vice Provost.

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

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

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

*Checklist and Guidance for Complying with NIH Policy when Reporting Other Support v.7 (8/3/2021). Thank you to the University of California, Santa Barbara for their very helpful website on these requirements.*

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

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

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

<b>Biosketch</b>	<p>Appointments: All positions, domestic and foreign, including titled academic, professional, or institutional and regardless whether full-time, part-time, voluntary, adjunct, visiting, honorary, or if remuneration is received.</p> <p>Include all active external positions and scientific appointments, including affiliations with foreign entities or governments. This includes titled academic, professional, or institutional appointments if remuneration of any kind (compensation or in-kind) is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary), as Other Support if held by senior/key personnel and regardless of whether awarded through Caltech, another institution or directly to the researcher.</p> <p><i>Note that external appointments that do not involve any remuneration should be reported in the Biosketch, and paid appointments must be included in Other Support.</i></p> <p><b>Changes effective January 25, 2022 (postponed from May 25, 2021):</b></p> <p>Section A</p> <ul style="list-style-type: none"> <li>Section A ("Personal Statement") adds language specifying that this section should be used for "including details on ongoing and completed research projects from the past three years that the researcher wants to draw attention to (previously known as research support)".</li> </ul> <p>Section B</p> <ul style="list-style-type: none"> <li>Section B, "Positions and Honors," has been renamed "Positions, Scientific Appointments, and Honors".</li> <li>Changes order of listing from "chronological order" to "reverse chronological order."</li> </ul>
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	<ul style="list-style-type: none"> <li>Revised to include the following specific language: "List in reverse chronological order all positions and scientific appointments both domestic and foreign, including affiliations with foreign entities or governments. This includes titled academic, professional, or institutional appointments whether or not remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary)."</li> </ul> <p>Section D</p> <ul style="list-style-type: none"> <li>Non-Fellowship Biosketches - Section D ("Scholastic Performance") has been removed.</li> <li>Fellowship Biosketches - Section D ("Scholastic Performance") has been updated to remove "Research Support".</li> </ul> <p>Updated SciENCv Template</p> <ul style="list-style-type: none"> <li>NIH anticipates that the updated SciENCv Biosketch template will be available by FY2022. Those with existing biosketches in SciENCv should be able to transfer their current biosketch information to the new format.</li> </ul> <p>NIH references:</p> <ul style="list-style-type: none"> <li><a href="#">Biosketch Format Pages, Instructions and Samples (updated March 2021)</a></li> <li><a href="#">Frequently Asked Questions (FAQs) - Biosketches (updated March 2021)</a></li> <li><a href="#">Instructions for a Biographical Sketch</a></li> <li><a href="#">Protecting US Biomedical Intellectual Innovation</a></li> </ul> <p>Consider using <a href="#">ORCID Open Researcher and Contributor ID</a> - a unique, persistent identifier free of charge to researchers. More information may be found at: <a href="https://libguides.caltech.edu/orcid">https://libguides.caltech.edu/orcid</a>.</p>
<b>Foreign Components</b>	<p>NIH requires grantees to seek <b>prior approval</b> of when a non-US entity will be performing a significant part of an NIH-funded project, regardless of whether NIH funds will be used to support that work.</p> <p>Performance of any significant part of an NIH project outside of the US includes, but is not limited to:</p>

	<p>Caltech should evaluate the activity being conducted outside of the United States within the context of the project as a whole, and make a determination about its significance and whether it is a Foreign Component. Examples of activities that may be considered a significant element of the project include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• collaborations with investigators at a foreign site anticipated to result in co-authorship</li> <li>• use of facilities or instrumentation at a foreign site</li> <li>• receipt of financial support or resources from a foreign entity</li> </ul> <p><i>Note: If the PI expects to name a foreign collaborator on any publications resulting from an NIH-funded project, name the person and the entity as a “foreign component” in the application, and seek prior approval before engaging the collaborator.</i></p> <p>NIH references:</p> <ul style="list-style-type: none"> <li>• <a href="#">Protecting US Biomedical Intellectual Innovation</a></li> <li>• <a href="#">Frequently Asked Questions (FAQs) - Other Support and Foreign Components</a></li> </ul>
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## Complying with NIH Policy when Completing Just-In-Time (JIT) Submissions

Current, as of August 3, 2021

### Institutional Financial Resources

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

Type	Should it be reported to NIH?
<b>Internal Awards (e.g., Caltech Innovation Initiative)</b>	Internal awards are included in Other Support if the award is in direct support of a research project. Specifically, the awards are used for a project that has (1) scope of work; (2) budget; (3) effort commitment by the PI; (4) period of performance.
<b>Gifts made to Caltech</b>	Caltech and the federal government define a gift as something given without expectation of anything in return. If an item or service meets the definition of a gift, it is not reported as Other Support. If you plan to use your designated gift funds in support of your research, they must be disclosed as Other Support. Also, an item or service given with the expectation of an associated time commitment is not a gift and is instead an in-kind contribution and must be reported to NIH.
<b>Start-up funds</b>	Caltech start-up packages provided to the PI from Caltech are NOT included in Other Support. Start-up packages from institutions other than Caltech must be reported in Other Support.

<b>Other Support</b>	<p><b>ATTENTION: NEW CHANGES TO OTHER SUPPORT, EFFECTIVE JANUARY 25, 2022 (postponed from MAY 25, 2021 (see <a href="#">NIH Notice No. NOT-OD-21-073, issued March 12, 2021</a>)</b></p> <p><b>Re-Organization of Form</b></p> <ul style="list-style-type: none"> <li>The format page has been restructured, separating funded projects from in-kind contributions.</li> </ul> <p><b>Signature Block Added</b></p> <ul style="list-style-type: none"> <li>All PD/Pis and other senior/key personnel must electronically sign the Other Support form prior to submission to NIH, certifying that the information is accurate and complete. Other Support forms must be submitted as a</li> </ul>
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	<p>flattened PDF after all signatures are obtained. Original electronic signatures must be maintained and made available upon request</p> <p><b>Supporting Documentation Relating to Foreign Activities or Resources</b></p> <ul style="list-style-type: none"> <li>If the Other Support submission includes foreign activities or resources, copies of contracts, grants, or any other agreements specific to the PD/PI or other senior/key-personnel's foreign appointments, affiliations, and/or employment with a foreign institution must be included with the Other Support submission. These documents must be translated into English if they are in a foreign language.</li> </ul> <p><b>Immediate Notification of Undisclosed Other Support</b></p> <p>If an organization discovers that a PD/PI or other senior/key personnel on an active NIH grant failed to disclose Other Support information outside of Just-in-Time or RPPR submissions, the institution must submit updated Other Support to the Grants Management Specialist named in the Notice of Award as soon as it becomes known. If you believe you need to disclose new information to NIH, please contact the Office of General Counsel (OGC).</p> <p><b>Formatting &amp; Future Transition to SciENCv</b></p> <ul style="list-style-type: none"> <li>NIH anticipates that the SciENCv template for Other Support will be available beginning in FY 2022. Until then, the MS Word version of the Other Support form should be used. (It must be converted to PDF and electronically signed prior to submission.)</li> </ul> <p><b>How does NIH use Other Support Information?</b></p> <p>NIH states that its scientific program and grants management staff review Other Support information to ensure that:</p> <ul style="list-style-type: none"> <li>All resources, domestic or foreign, directly supporting the individual's research endeavors have been reported</li> <li>Sufficient levels of effort are committed to the project</li> <li>There is no scientific, budgetary, or commitment overlap</li> <li>Only funds necessary to the approved project are included in the award</li> <li>Any foreign resources that meet the definition of a foreign component have received appropriate prior approval.</li> </ul>
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	<p><b>In addition to the above new requirements (which go into effect May 25, 2021), Other Support submissions must report the following, based on current, established NIH requirements:</b></p> <p>NIH uses the information submitted in the Other Support section to assess the individual researcher's capacity to carry out the project as proposed and help assess any potential overlap or duplication with the project being proposed.</p> <p>NIH requires information on current and pending support for ongoing projects and proposals <b>(new)</b>.</p> <p>All domestic and foreign <b>research collaborations</b> that directly benefit the researcher's research endeavors <b>(new)</b>.</p> <p>Include the following Other Support information:</p> <ul style="list-style-type: none"> <li>• All planned, pending and current project support and in-kind support that is either provided directly to the individual, or through an organization in support of that individual's research endeavors, from whatever source, including, but not limited to: <ul style="list-style-type: none"> <li>○ Contracts or Cooperative Agreements for Research – All such sponsored agreements for research or educational activities that take place at Caltech or elsewhere must be included as Other Support.</li> <li>○ Consulting activities that involve performing research* for other entities that exceed Caltech's policy of one day per week or thirteen (13) days per quarter must be included in Other Support. Report the estimated amount paid for the consulting activity and not the time or effort commitment for the consulting <b>(new)</b>. <i>Reminder: Consulting Agreements - Consulting activities must be reported through the Caltech Conflict of Interest Disclosure system regardless of whether external consulting supports research endeavors.</i></li> </ul> </li> <li>• Fellowship Program - Included in Other Support If the fellowship is granted to the Principal Investigator and/or key personnel.</li> <li>• Foreign Talent Program<sup>1</sup> - Include in Other Support for the Principal Investigator and any senior/key personnel.<b>(new)</b></li> </ul>
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<sup>1</sup> Foreign Government Talent Recruitment Program. In general, such programs include any foreign-state-sponsored attempt to acquire U.S. scientific-funded research or technology through foreign government-run or funded recruitment programs that target scientists, engineers, academics, researchers, and entrepreneurs of all nationalities working or educated in the United States. These recruitment programs are often part of broader whole-of-government strategies to reduce costs associated with basic research while focusing investment on military development or dominance in emerging technology sectors. See <https://www.sciencemag.org/sites/default/files/January%20DOE%20memo.pdf> for more information, including distinguishing features of a foreign government talent recruitment program as defined by the Department of Energy.

	<ul style="list-style-type: none"> <li>Grants for Research - Included as Other Support regardless of whether or not the grants are based at Caltech</li> </ul> <p><b>In-kind Support</b></p> <p>In-kind support: Other resources made available to a researcher in support of and/or related to all of their research endeavors, regardless of whether they have monetary value and whether they are based at the institution the researcher identifies for the current grant. This includes but is not limited to:</p> <ul style="list-style-type: none"> <li>Resources and/or financial support from all foreign and domestic entities that are available to the researcher. This includes but is not limited to <ul style="list-style-type: none"> <li>financial support for laboratory personnel, including visitors and volunteers</li> <li>postdoctoral fellowships paid directly to a researcher funded by a foundation or other organization if the person is performing research activities in support of your research endeavors</li> <li>the provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.) provided within the last three years, and that are still in use.</li> </ul> </li> <li>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.</li> <li>All domestic and foreign <a href="#">research collaborations</a> that directly benefit the researcher's research endeavors. <ul style="list-style-type: none"> <li>report collaborators with whose experiments directly benefit your research, or</li> <li>provide you with "high value" materials, samples, etc. that have been provided to you in the last three years, and that are still in use. Be sure to include such materials that you would plan to acknowledge as contributions to your work in a publication.</li> </ul> </li> </ul> <p>When in doubt, err on the side of disclosure to federal sponsors.</p> <p>Projects and Activities - All Projects and Activities not already included above are included as Other Support if the project or activity supports an individual's research in any way at Caltech or any institution or entity.</p> <p>Prizes and Training Grants - Not included as Other Support</p> <p>NIH references:</p>
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	<ul style="list-style-type: none"> <li>• <a href="#">Other Support Instructions</a> (<i>updated March 2021</i>)</li> <li>• <a href="#">Frequently Asked Questions (FAQs) - Other Support and Foreign Components</a> (<i>updated March 2021</i>)</li> <li>• <a href="#">Protecting US Biomedical Intellectual Innovation</a></li> <li>• <a href="#">Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components</a></li> <li>• <a href="#">COGR - Commentary on Disclosing Other Support and Other Resources in Research Funded by the National Institute of Health</a></li> </ul>
Other disclosures during JIT	<p><b><i>Please note that Caltech is required to promptly notify NIH of any substantive changes to previously submitted Just-in-Time information up to the time of the award.</i></b></p> <p>Accordingly, review the Biosketch and other disclosures and make any necessary revisions before submitting JIT information for a new award.</p>

<p>Research Performance Progress  Report</p>	<p>Changes in Other Support information must be updated annually for the PD/PI and for those individuals considered by Caltech to be key to the project and must be reported in the annual progress report. Senior/key personnel are defined as individuals who contribute in a substantive measurable way to the scientific development or execution of the project, whether or not a salary is requested. NIH has added the following question to the RPPR: "D.2.c Changes in Other Support - Has there been a change in the active other support of senior/key personnel since the last reporting period?"</p> <p>Use the new NIH Other Support page for both the JIT process and subsequent annual reports.</p> <p>See the page on RPPR reporting, or follow NIH's detailed RPPR instructions beginning on page 86 of the document/page 93 of the <a href="#">RPPR instructions PDF</a></p>
<p>Reporting Undisclosed Relationships to NIH</p>	<p>Effective <a href="#">January 25, 2022</a>, Caltech will be required to inform NIH immediately of any missed disclosures of Other Support within 30 days after it becomes known to Caltech. NIH states: 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.</p> <p>If you believe you need to disclose new information to NIH, please contact the Office of General Counsel (OGC). If you and OGC determine that there is something to report, you will work with OSR to submit the retroactive disclosure to NSF using an "Other Request" in Research.gov.</p>