

DISCLOSURE OF OTHER SUPPORT – NIH

Summary:

Who discloses: All senior/key personnel

What to disclose: Resources and financial support for research activities, from all sources; in-kind contributions to research; consulting arrangements where research is part of the services; positions and scientific appointments; copies of agreements specific to senior/key personnel non-US appointments and/or employment. ****Please read details below for a fuller description.**

When to disclose: As part of the pre-award “Just-in-Time procedure”, and then with each annual research performance progress report (RPPR) cycle

Why disclose: Required as per NIH interpretation and implementation of US federal regulations.

***Please read detailed explanations (below) before preparing disclosures. In all cases below, “foreign” refers to non-USA and includes Canada.**

We are here to help if you have any questions:

Research Project Advisors: Jenny Robinson j.robinson@queensu.ca; Andrea Hiltz ahiltz@queensu.ca

Research Contracts: researchcontracts@queensu.ca

Research Facilitator: Kelly Manuel km270@queensu.ca

Overview:

“**Other Support**”, sometimes referred to as “current and pending support” or “active and pending support”, is defined as: **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.** Information on Other Support may be requested (often as part of Just-in-Time procedures for grant applications or in progress reports) to ensure there is no scientific, budgetary, or commitment overlap.

The information contained in this brief is excerpted and adapted from the [NIH Other Support website](#), [NOT-OD-21-073: Upcoming Changes to the Biographical Sketch and Other Support Format Page for Due Dates on or after May 25, 2021](#), [NOT-OD-19-114: Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components](#) and the [National Defense Authorization Act 2021 at section 223](#).

Who discloses:

Reporting of Other Support is required for all individuals designated in an application as [senior/key personnel](#)—those devoting measurable effort to a project.

Note: Information on Other Support is not specifically requested for Program Directors, training faculty, and other individuals involved in the oversight of training grants since applicable information is collected in other sections of a training grant application. Other Support is not required to be submitted for individuals categorized as [Other Significant Contributors](#).

What to disclose:

The NIH applicant is required to disclose all Other Support, including the following:

- **Resources and/or financial support** from all foreign (non-US) and domestic (US) entities, that are available to the researcher. This includes but is not limited to:
 - financial support for laboratory personnel, and
 - provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.).

Note: 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.

- **Consulting agreements**, when the program director/principal investigator (PD/PI) or other senior/key personnel will be conducting research as part of the consulting activities.

Note: Non-research consulting activities are not Other Support.

- **In-kind contributions**, e.g. office/laboratory space, equipment, supplies, or employees or students supported by an outside source. If the time commitment or dollar value of the in-kind contribution is not readily ascertainable, the recipient must provide reasonable estimates.

In addition, the NIH applicant is required to:

- List **all positions and scientific appointments** both domestic (US) and foreign (non-US) held by senior/key personnel that are relevant to an application 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 appointments (including adjunct, visiting, or honorary).

Further, effective January 25, 2022 the NIH requires the following in relation to Other Support:

- For **Other Support submissions that include foreign activities and resources, recipients are required to submit copies of contracts, grants or any other agreements specific to senior/key personnel foreign appointments and/or employment with a foreign institution as supporting documentation.**

Note: Translations must be provided for any contracts/agreements not in English. This supporting documentation must be provided as part of the Other Support PDF following the Other Support Format page.

- Immediate notification of undisclosed Other Support. When a recipient organization discovers that a PI or other Senior/Key personnel on an active NIH grant failed to disclose Other Support information outside of Just-in-Time or the RPPR (research performance progress reports), 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.

The disclosure of Other Support to the NIH also applies to Other Support held at institutions other than Queen's (including non-Queen's facilities at the hospitals in Kingston), wherever that may be located.

When to disclose:

All pending support at the time of application submission and prior to award must be reported using "Just-in-Time Procedures" by providing all information indicated above. Applicants are responsible for promptly notifying NIH of any substantive changes to previously submitted Just-in-Time information up to the time of award, including Other Support changes that must be assessed for budgetary or scientific overlap.

Further, if Other Support, as described as above, is obtained after the initial NIH award period, from any source either through the applicant institution or directly to senior/key personnel, the details must be disclosed in the annual research performance progress report (RPPR).

Post-award, recipients must address any substantive changes by submitting a prior approval request to NIH in accordance with the NIHGPS section on "Administrative Requirements—Changes in Project and Budget—NIH Standard Terms of Award."

Consequences of failure to disclose:

Failure to disclose Other Support in accordance with the directives may include one or more of the following: rejection of the application; suspension or termination of the award; temporarily or permanently barring the researcher/institution from receiving awards from the NIH; temporarily or permanently barring the researcher/institution from receiving any US government funding; and/or refer the failure to disclose to the agency's inspector general or federal law enforcement to determine if any civil or criminal laws were violated.