Caltech Checklist for Complying with NIH Policy
when Reporting Other Support
Current as of April 6, 2020

Below are two tables organizing common types of financial resources into two categories: Institutional and External. Both tables list the type of resource and then address generally whether it would be included.

Other Support information must be provided for all senior/key personnel.

Finally, for every resource that is included, NIH requires that we, "Provide the total award amount for the entire award period covered (including facilities and administrative costs), as well as the number of person-months (or partial person-months) per year to be devoted to the project by the senior/key personnel involved." Please note that current NIH forms (attached as an Appendix) incorrectly request the annual award amount.

Institutional Financial Resources

Type of Financial Resource	Is it Other Support?
Internal Awards (e.g., Caltech Innovation Innitiative)	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.
Start-up funds	Other support does not include startup support from Caltech. If a researcher has startup funds from instituions other than Caltech, they must be included.

External Financial Resources

Type of Financial Resource	Is it Other Support?
Appointments (<u>All positions</u>, 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.	Include all 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. External appointments that do not involve any remuneration are not reported in the Other Support" section. They should be included in the Biosketch.
Contracts for Research	Contracts that that relate to or support research endeavors at Caltech or elsewhere should be included as Other Support.
Consulting Agreements	Consulting activities need to be reported through the Caltech Conflict of Interest Disclosure system regardless of whether external consulting supports their research endeavors. NIH has excluded Consulting Agreements from being reported as Other Support, unless an individual's independent external consulting supports their research endeavors in any way at any institution or entity, it should be included.
Cooperative Agreements for Research	Cooperative Agreements that that relate to or support research endeavors at Caltech or elsewhere should be included as Other Support.

Fellowship Program	Included as Other Support, for the Principal Investigator, key personnel, and any lab members, if funded by a sponsor other than NIH who is known to be supporting this project.
Foreign Talent Program[1]	Included as Other Support, both for the Principal Investigator, key personnel, and any lab members.
Gifts	Not included as Other Support unless the gift is for a specific project as indicated in the gift award OR, as a condition of the gift, the support must be recognized in publications, and/or a report to the donor is required, and/or any other conditions are imposed
Grants for Research	Included as Other Support regardless whether or not they are based at Caltech
In-Kind Resources (e.g., office/lab space, equipment, supplies, employees, etc.)	In-kind resources from outside of Caltech are included as Other Support if available in direct support of the individual's research endeavors at Caltech or any other institution or entity. A monetary value does not need to be assigned to in-kind resources.
Other Resources (e.g., financial support from all foreign and domestic entities, including but not limited to, financial support for laboratory personnel, and provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.))	Other Resources, not already included above, are included as Other Support if available in direct support of the individual's research endeavors at Caltech or at any institution or entiy. *This includes awards made directly to graduate students who are working on this research project in the researcher's lab..*
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 at any institution or entity.
Prizes	Not included as Other Support

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[1] 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.

Distinguishing features of a foreign government talent recruitment program covered by this Order include:
(1)Compensation provided by the foreign state to the targeted individual in exchange for the individual transferring their knowledge and expertise tothe foreign country. The compensation can take several forms, such as cash, research funding, honorific titles, career advancement opportunities, promised future compensation, or other types of remuneration or consideration.
(2)Recruitment in this context refers to the foreign-state-sponsor's active engagement in attracting the targeted individual to join the foreign-sponsored program and transfer their knowledge and expertise to the foreign state. The targeted individual may be employed and located in the U.S., or in the foreign state. Recruitment would not necessarily include any invitation for engagement extended by the foreign state, for example, an invitation to attend or present work at an international conference.
(3)Many, but not all, programs aim to incentivize the targeted individual to physically relocate to the foreign state. Of particular concern are those programs that allow for continued employment at U.S. research facilities or receipt of DOE research funds while concurrently receiving compensation from the foreign state.

Appendix
Guidance on Complying with NIH Policy
and Format for Reporting NIH Other Support
Current as of April 6, 2020

NIH scientific program and grants management staff review Other Support information to ensure that:

- All resources, domestic and foreign, directly supporting the indiidual's research endeavors have been reported
- Sufficient levels of effort are commited to the project
- There is no scientific, budgetary or commitment overlap
- Only funds necessary to the approved project are included in the award

Recently, NIH issued notice NOT-OD-19-114, as well as related FAQs, which have raised questions at Caltech and other research institutions about what is reportable as Other Support. The purpose of this guidance is to help Principal Investigators, researchers and staff determine what information should be included in Other Support. It is based on current agency policy and recent communication and is subject to change as additional clarifications are received from NIH.

Section 2.5.1 of the Grants Policy Statement (GPS) describes what is included in Other Support. By means of providing examples, the GPS includes all forms of financial resources limited only by whether such resource is "available in direct support of an individual's research endeavors." In addition to that key limitation, it also specifically excludes "training awards, prizes or gifts."

Notice NOT-OD-19-114 expands on the GPS. NIH expects disclosure of "… *all* resources made available to a researcher in support of and/or related to *all* their research endeavors…". (Emphasis added) Additionally, any scientific, budgetary, or commitment overlap must be disclosed.

The other important limitations are role-based.

1.   Who needs to report Other Support.

NIH requests Other Support information for:

Other support is requested for all individuals designated in an application as senior/key personnel-those devoting measurable effort to a project. 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. It is also not requested for individuals categorized as Other Significant Contributors.

Senior/Key Personnel: The program director/principal investigator (PD/PI) and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they request salaries or compensation. Typically these individuals have doctoral or other professional degrees, although individuals at the masters or baccalaureate level may be considered senior/key personnel if the involvement meets this definition. Consultants may be considered senior/key personnel if they meet this definition.

2.   When to Report Other Support.

1. Just in Time: Section 2.5.1 of the Grants Policy Statement describes what information from active and pending support are required as part of the Just-in-Time procedures. Other support includes all financial resources, whether Federal, non-Federal, commercial or institutional, available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts, and/or institutional awards. Training awards, prizes or gifts are not included.

2. Research Performance Progress Report: Changes in other support are addressed in the RPPR Instruction Guide, Section D.2c.

   a. If there are new Senior/Key Personnel, the RPPR must include a biosketch and other support for each new personnel. The RPPR instructions require that the researchers combine all biosketches and other support into a single PDF before uploading.

   b. If there has been a change in the active other support of Senior/Key personnel since the last reporting period, the RPRR must include active other support for senior/key personnel whose support has changed and indicate what the change has been. The RPPR instsructions require that the researchers list the award for which the progress report is being submitted and include the effort that will be devoted in the next reporting period. If a previously active grant has terminated and/or if a previously pending grant is now active, submit complete Other Support information using the suggested format and instructions found in Form 2590 (see below). Annotate this information so it is clear what has changed from the previous submission. Submission of other support information is not necessary if support is pending or for changes in the level of effort for active support reported previously.

3.   Format

The NIH is reviewing its formatting guidance. The following information is the format currently recommended by NIH.

   a. PI Name
   b. Active/Pending
   c. Dates of approved/proposed project
   d. Annual Budget
   e. Person Months Effort
   f. Project Number (PI)
   g. Source (Sponsor)
   h. Title of Project
   i. Major Goals of Project
   j. Overlap[2] (None, Scientific, Budgetary, or Commitment)

[1]OVERLAP: Identify any scientific, budgetary, or commitment overlap that would occur if the current proposal were approved. Then state how it would be resolved. The goals in identifying and eliminating overlap are to ensure that sufficient and appropriate levels of effort are committed to the project; that there is no duplication of funding for scientific aims, specific budgetary items, or an individual's level of effort; and that only funds necessary to the conduct of the approved project are included in the award.

Budgetary overlap occurs when duplicate or equivalent budgetary items (e.g., equipment, salary) are requested in an application but are already provided for by another source.

Commitment overlap occurs when a person's time commitment exceeds 100 percent (i.e., 12 person months), whether or not salary support is requested in the application. While information on other support is only requested for Senior/key Personnel (excluding consultants), no individuals on the project may have commitments in excess of 100 percent or 12 person months.

Scientific overlap occurs when: (1) substantially the same research is proposed in more than one application or is submitted to two or more different funding sources for review and funding consideration, or (2) a specific research objective and the research design for accomplishing that objective are the same or closely related in two or more applications or awards, regardless of the funding source. Potential scientific overlap is to be addressed by the SRG *only* by its identification in an Administrative Note in the Summary Statement.

Use NIH Format PHS398 for Just in Time submissions (JIT) or for new personnel on RPPR. Sample, below.

PI LAST NAME, PI FIRST NAME <u>ACTIVE</u> or <u>PENDING</u>	Dates of approved/proposed project M/D/YYYY – M/D/YYYY Annual Budget $xxx,xxx.xx	Person Months (Cal) #
Project Number (PI) Example: # R01 XX 00000-YY (PI Last Name) Source Example: NIH/NHLBI Title of Project or Subproject Example: Chloride and Sodium Transport in Airway Epithelial Cells The major goals of the project Example: The major goals of this project are to define the biochemistry of chloride and sodium transport in airway epithelial cells and clone the gene(s) involved in transport.		
Overlap: None, Scientific, Budgetary, or Effort Example: There is scientific overlap between aim 2 of NIH R01 XX 00000-YY and aim 4 of the application under consideration. If both are funded, the budgets will be adjusted appropriately in conjunction with agency staff.		

Use NIH Format PHS 2590 for reporting changes in Research Performance Progress Reports (RPPR). Sample, below.

PI LAST NAME, PI FIRST NAME <u>CHANGE</u>: <u>NEW</u> or <u>INACTIVE</u> <u>ACTIVE</u> or <u>INACTIVE</u>	Dates of approved/proposed project M/D/YYYY – M/D/YYYY Annual Budget $xxx,xxx.xx	Person Months (Cal) #
Project Number (PI) Example: # R01 XX 00000-YY (PI Last Name) Source Example: NIH/NHLBI Title of Project or Subproject Example: Chloride and Sodium Transport in Airway Epithelial Cells The major goals of the project Example: The major goals of this project are to define the biochemistry of chloride and sodium transport in airway epithelial cells and clone the gene(s) involved in transport.		
Overlap: None, Scientific, Budgetary, or Effort Example: There was scientific overlap between aim 2 of NIH R01 XX 00000-YY and this aim 4 of this award. Since this was funded, the budgets has been adjusted appropriately in conjunction with agency staff.		

For New and Renewal Applications – DO NOT SUBMIT UNLESS REQUESTED

PHS 398 OTHER SUPPORT

Provide active and pending support for all senior/key personnel. **Other Support includes all financial resources, whether federal, non-federal, commercial or institutional, available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts, and/or institutional awards.** Training awards, prizes, or gifts do not need to be included.

There is no "form page" for reporting Other Support. Information on Other Support should be provided in the *format* shown below.

For information pertaining to the use of and policy for other support, see NIH Grants Policy Statement, Section 2.5.1: Just-in-Time Procedures. Neither the application under consideration nor the current PHS award for this project should be listed as Other Support.

Effort devoted to projects must be measured using "person months." NIH and other PHS agencies use the concept of "person months" as a metric for determining percent of effort. For more information about calculating person months, see NIH's Frequently Asked Questions on Person Months.

Format

NAME OF INDIVIDUAL		
ACTIVE/PENDING		
Project Number (Contact Principal Investigator) Source Title of Project *(or Subproject)* The major goals of this project are…	Dates of Approved/Proposed Project Annual Direct Costs	Person Months (Cal/Academic/ Summer)
OVERLAP *(summarized for each individual)*		

Instructions for Selected Items

Project Number: If applicable, include a code or identifier for the project.

Source: Identify the agency, institute, foundation, or other organization that is providing the support. Include institutional, federal, public, and private sources of support.

Major Goals: Provide a brief statement of the overall objectives of the project, subproject, or consortium/contractual arrangement.

Dates of Approved/Proposed Project: Indicate the inclusive dates of the project as approved/proposed. For example, in the case of NIH support, provide the dates of the approved/proposed competitive segment.

Annual Direct Costs: In the case of an active project, provide the current year's direct cost budget. For a pending project, provide the proposed direct cost budget for the initial budget period.

Percent Effort/Person Months: Indicate calendar, academic, and/or summer months associated with each project. For an active project, provide the level of actual effort in person months (even if unsalaried) for the current budget period. Person months should be classified as academic, calendar, and/or summer. For a pending project, indicate the level of effort in person months as proposed for the initial budget period. Use either calendar months OR a combination of academic and summer months. If effort does not change throughout the year, it is OK to use only calendar months. However, you may use both academic and summer months if your institutional business process requires noting each separately even if effort remains constant. If effort varies between academic and summer months, use only academic and summer months, and do not use calendar months. In cases where an individual's appointment is divided into academic and summer segments, indicate the proportion of each devoted to the project.

Overlap: After listing all support, summarize for each individual any potential overlap with the active or pending projects and this application in terms of the science, budget, or an individual's committed effort.

Note for Other Support provided under a consortium/contractual arrangement or that is part of a multi-project award: *Indicate the project number, PD/PI, and source for the overall project, and provide all other information for the subproject only.*

Special Instructions for Joint University and Department of Veterans Affairs (VA) Appointments

Individuals with joint university and VA appointments may request the university's share of their salary in proportion to the effort devoted to the research project. The individual's salary with the university determines the base for computing that request. Signature by the Institutional Official on the application certifies that: (1) the individual is applying as part of a joint appointment specified by a formal Memorandum of Understanding between the university and the VA; and (2) there is no possibility of dual compensation for the same work, or of an actual or apparent conflict of interest regarding such work. Additional information may be requested by the awarding component(s).

PHS 2590/RPPR OTHER SUPPORT FORMAT PAGE

Submit Other Support for all new senior/key personnel, and updated Other Support for all senior/key personnel for whom there has been a change since the last reporting period.

Provide only active support for all new senior/key personnel. Provide updated Other Support for all senior/key personnel for whom there has been a change in other support. If a previously active grant has terminated and/or if a previously pending grant is now active, update by annotating accordingly.

Other Support includes all financial resources, whether federal, non-federal, commercial or institutional, available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts, and/or institutional awards. Training awards, prizes, or gifts do not need to be included.

Effort devoted to projects must be reported in "person months." NIH and other PHS agencies use the concept of "person months" as a metric for determining percent of effort. For more information about calculating person months, see NIH's <u>Frequently Asked Questions on Person Months</u>.

Use the suggested format shown below**.** See section D.2.c of the<u> RPPR Instruction Guide</u>, and <u>NIH Grants Policy Statement, Section 2.5.1: Just-in-Time Procedures</u> for more information.

Format

NAME OF INDIVIDUAL ACTIVE/INACTIVE		
Project Number or Name (Contact PD/PI name) Source of Support Title of Project or Subproject The major goals of this project are…	Dates of Approved/Proposed Project Annual Direct Costs	Person Months (Calendar/Academic/Summer)
OVERLAP *(summarized for each individual)*		

Instructions for Selected Items

Project Number: If applicable, include a code or identifier for the project.

Source: Identify the agency, institute, foundation, or other organization that is providing the support. Include institutional, federal, public, and private sources of support.

Major Goals: Provide a brief statement of the overall objectives of the project, subproject, or consortium/contractual arrangement.

Dates of Approved/Proposed Project: Indicate the inclusive dates of the project as approved/proposed. For example, in the case of NIH support, provide the dates of the approved/proposed competitive segment.

Annual Direct Costs: In the case of an active project, provide the current year's direct cost budget. For a pending project, provide the proposed direct cost budget for the initial budget period.

Percent Effort/Person Months: Indicate calendar, academic, and/or summer months associated with each project. For an active project, provide the level of actual effort in person months (even if unsalaried) for the current budget period. Person months should be classified as academic, calendar, and/or summer. For a pending project, indicate the level of effort in person months as proposed for the initial budget period. Use either calendar months OR a combination of academic and summer months. If effort does not change throughout the year, it is OK to use only calendar months. However, you may use both academic and summer months if your institutional business process requires noting each separately even if effort remains constant. If effort varies between academic and summer months, use only academic and summer months, and do not use calendar months. In cases where an individual's appointment is divided into academic and summer segments, indicate the proportion of each devoted to the project.

Overlap: After listing all support, summarize for each individual any potential overlap with the active or pending projects and this application in terms of the science, budget, or an individual's committed effort.

Special Instructions for Joint University and Department of Veterans Affairs (VA) Appointments

Individuals with joint university and VA appointments may request the university's share of their salary in proportion to the effort devoted to the research project. The individual's salary with the university determines the base for computing that request. Signature by the Institutional official on the application certifies that: (1) the individual is applying as part of a joint appointment specified by a formal Memorandum of Understanding between the university and the VA; and (2) there is no possibility of dual compensation for the same work, or of an actual or apparent conflict of interest regarding such work. Additional information may be requested by the awarding component(s).