Other Support

Information on other support assists awarding agency staff in the identification and resolution of potential overlap of support. Overlap, whether scientific, budgetary, or commitment of an individual's effort greater than 100 percent*, is not permitted. 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 only funds necessary to the conduct of the approved project are included in the award.

* Be aware of appointment type and clinical, teaching, and/or administrative requirements; effort may need to be capped at 95% (11.4 Calendar months) to allow time for those activities. Learn more about the 95% rule here.

- NIH Other Support
- NSF Current and Pending Support
- DOD Current and Pending Support
- Other Support FAQs
- Additional Resources

NIH Other Support

All 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.

Includes (but not limited to):

- all foreign and domestic entities
- financial support for laboratory personnel
- provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.)

Does not included Training awards, prizes and gift.

The following information needs to be included on Other Support:

1. List all positions and scientific appointments both domestic and foreign

   - 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)
   - Examples include Biohub appointments, salary paid by HHMI Investigator, Lecture Professor at Foreign Entity.
2. Report all resources, **irrespective of whether such support is provided through the applicant organization**, through another domestic or foreign organization, or is provided directly to an individual that supports the senior/key personnel? s research efforts.

3. Report even if the support received is only in-kind (e.g. office/laboratory space, equipment, supplies, employees)

   - This includes visiting scholars/students working in lab who are supported by a domestic or foreign entity either through salary, stipend or receipt of living or travel expenses.

NIH Other Support is required for all Senior/Key Personnel at Just-in-Time (JIT) and changes are reported in each annual research performance progress report (RPPR).

**What is a Foreign Component?**

Foreign Component is existence of any **significant scientific element or segment of a project** outside of the United States, in other words:

1. performance of work by a researcher or recipient in a foreign location, whether or not NIH grant funds are expended and/or
2. performance of work by a researcher in a foreign location employed or paid for by a foreign organization, whether or not NIH grant funds are expended.

If project staff (including visiting faculty, scientists, etc.) leave the country to return home due to COVID-19 and continue to work on the project, whether paid by the project or not, **this could qualify as a foreign component and would require prior approval from the NIH IC**.

For Postdoctoral scholars that are required to work on their originally approved work remotely from a foreign country due to COVID-19 travel restrictions, where no grant funds are going to a foreign entity, NIH has determined this scenario does **not** constitute the performance of a significant element or segment of the project outside the US. Therefore, this is not considered a foreign component and does not require prior approval.

**SOURCE:** NIH NOT-OD-19-114, NIH COVID-19 FAQ

**What are some examples of a significant element of a project when making determinations regarding a foreign component?**

The recipient institution should evaluate the element of the project that is being conducted outside of the United States within the context of the project as a whole when making determinations about significance. Some examples of activities that may be considered a significant element of the project include, but are not limited to:

- collaborations with investigators at a foreign site anticipated to **result in co-authorship**
- **use of facilities or instrumentation** at a foreign site
- receipt of financial support or **resources from a foreign entity**

**SOURCE:** NIH FAQs,

**Does a Foreign Component need to be included on Other Support?**
The Foreign component should be part of the proposal, R&R Other Project Information Form, not the Other Support document. The addition of a foreign component to an ongoing NIH grant continues to require NIH prior approval, as outlined in the NIHGPS, Section 8.1.2, Prior Approval Requirements. Principal Investigator's should work with their RSC to submit the prior approval request.

If an activity does not meet the definition of foreign component because all research is being conducted within the United States, but there is a non-U.S. resource that supports the research of an investigator and/or researcher, it must be reported as other support.

For example, if a PD/PI of an NIH-funded grant has a collaborator outside of the U.S. who performs experiments in support of the PD/PI's NIH-funded project, this would constitute a foreign component, regardless of whether the foreign collaborator receives funding from the PD/PI's grant. Additional funding from a foreign source for the NIH-supported research of a PD/PI at a U.S. institution would not constitute a foreign component but would necessitate reporting as other support.

SOURCE: NIH NOT-OD-19-114

NIH Resources:

- NIH Other Support Instructions
- NIH Other Support Samples (JIT OS, RPPR OS, JIT OS with VA joint appointment, K Awards with Complementary effort and/or Concurrent support)
- Go here to learn more about Complementary effort and Concurrent Support
- NOT-OD-19-114: Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts and Foreign Components
- NIH Other Support FAQs
- NIH Other Support Grants.gov Page
- Summary of NIH Policy regarding Senior/Key Personnel and Investigator: This chart provides definitions, who designates, requirement, and references for proposals, other support, prior approval and COI.
- Summary of NIH Policy regarding Other Support vs. Biosketch: Contains a quick reference chart (page 1) and a detailed chart (page 2)
- If the PI's level of effort changes by 25% or more than what was proposed PRIOR APPROVAL is required from NIH

NSF Current and Pending Support

All proposed and ongoing projects from all sources (federal, state, local, foreign, public or private foundation, non-profit, industry or commercial, or internal funds), whether provided through the proposing organization or provided directly to the individual.

Includes:

- All resources made available to an individual in support of and/or related to their research efforts, regardless of whether or not they have monetary value
- All in-kind contributions (e.g. office/laboratory space, equipment, supplies, employees, students) or items or services, whether intended/not intended for use on the
project/proposal, and with the expectation of an associated time commitment

- If the time commitment or dollar value is not readily ascertainable, reasonable estimates should be provided
- In-kind contributions intended for use on the project with no associated time commitment are included in the Facilities, Equipment, and Other Resources section of the proposal and are not replicated in the current and pending support
- In-kind contributions not intended for use on the project with no associated time commitment are not reported
- Startup packages from any organization other than the proposing organization
- If the project or any part of the project was funded previously by a source other than NSF, information must be provided regarding the last period of funding

NSF Current and Pending Support is a required for each individual designated as senior personnel as part of the proposal.

**Post-Award Disclosure:**

If it is discovered that a PI or co-PI on an active NSF grant failed to disclose current support or in-kind contribution information as part of the proposal submission process (see PAPPG Chapter II.C.2.h), the AOR must submit the Current Support information within 30 calendar days of the identification of the undisclosed current support or in-kind contribution through use of the ?Other Request? category in the Notification and Request Module in Research.gov. Please work with your OSR Staff member to follow the instructions in the NSF Award Terms and Conditions - Arctilcle 48. Post-Award Disclosure of Current Support and In-Kind Contribution Information.

**NSF Resources:**

- NSF PAPPG NSF 20-1 Current and Pending Support
- NSF PAPPG (NSF 20-1) webinar (recorded February 6, 2020)
- FAQs addressing policy questions related to the PAPPG (NSF 20-1) clarifications to the current and pending support coverage, as well as questions regarding use of an NSF-approved format for current and pending support

- NSF-Approved Formats for Current and Pending Support website
- SciENcv Guidance on Creating an NSF Current and Pending Support document, including step-by-step instructions and screenshots for the two required sections (This is a subsection of the guidance at SciENcv Help.)
- FAQs on using NSF Fillable PDF

**DOD Previous/Current/Pending Support**

For all previous (award period of performance ending within the past 5 years), current, and pending research support, include the title, time commitments, supporting agency, name and address of the funding agency?s procuring Contracting/Grants Officer, performance period, level of funding, brief description of the project?s goals, and list of the specific aims. If
applicable, identify where the proposed project overlaps with other existing and pending research projects. Clearly state if there is no overlap.

An updated previous, current, and pending support document will be required if an award is recommended for funding.

**DOD Resources:**

- DOD Example
- DOD Memo - Actions for Protection of Intellectual Property, Controlled Information, Key Personnel and Critical Technologies

**Other Support FAQs:**

1. What should the budget amount during a NCE, the last year’s direct cost, or what is remaining?
2. When should we remove something from the pending section?
3. Do you need prior approval from the NIH’s GMS for subsumed effort on a K award?
4. If my faculty is a co-investigator on a grant, should I list the project costs for the whole project, or for just his/her portion of the project?
5. How do I get previous copies of NIH RPPR progress reports?
6. Should I Submit the Other Support directly to NIH, or should it go to the RSC?
7. Do we need prior approval for an increase of effort?
8. What if we have received prior approval to reduce effort?
9. What should I do if NCE is pending?
10. What are the different types of Overlap?
11. What are some examples of Overlap statements?
12. Does UCSF have any additional resources regarding Foreign Influence?
13. If a PI has an appointment or receives resources from another entity, does this need to be reported internal at UCSF?
14. For NIH Other Support, should we use Total Costs or Annual Direct Costs?
15. Is the department’s role w/ foreign influence just to help make faculty aware and direct them to appropriate offices? Or are we expected to verify all information against other sources of information? For instance, do we need to be vetting non-US sponsors of research against entities subject to Restricted Persons Screening?

**Q1:** What should the budget amount during a NCE, the last year’s direct cost, or what is remaining?

**A:** The direct costs from the last year.
Q2: When should we remove something from the pending section?

A: Either if the start date has already passed, or if the PI hears from the sponsor that it will not be funded.

Q3: Do you need prior approval from the NIH’s GMS for subsumed effort on a K award?

A: No, subsumed effort is complementary effort and does not require prior approval but you do need approval for concurrent support. For more information go NIH GPS Chapter 12 (see 12.3.6.1 and 12.3.6.2)

Q4: If my faculty is a co-investigator on a grant, should I list the project costs for the whole project, or for just his/her portion of the project?

A: The project costs for the whole project. If this is a large project grant (for example a P50), list only projects/core that the faculty member work on, list the project costs for the project/core.

Q5: How do I get previous copies of NIH RPPR progress reports?

A: NIH RPPR progress reports are uploaded to eProposal. To find documents in eProposal follow the Finding Projects and eProposal Navigation guide (Must have an UCSF Myaccess account to view). Search by the A#.

Q6: Should I Submit the Other Support directly to NIH, or should it go to the RSC?

A: Submit the Other Support to the RSC. The RSC will submit to NIH.

Q7: Do we need prior approval for an increase of effort?

A: For NIH, no. You only need prior approval for REDUCTIONS of 25% or more (if they are listed as Key Personnel in the Notice of Award). If not NIH, please check the sponsor policy.

Q8: What if we have received prior approval to reduce effort?

A: This is the new baseline of effort. If you make further reductions, you need to ask for prior approval if you reduce by 25% of this NEW approved effort level.
Q9: What should I do if NCE is pending?

A: Keep it listed in the active section. Put the proposed new dates and next to the dates, put in Parentheses, NCE Pending.

Example:

R01 HL 000000^2 (Anderson) (AXXXXX) 03/1/10 02/28/16(NCE Pending) 5.60 calendar

FAQ Top

Q10: What are different types of overlap?

A: 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.

FAQ Top

Q11: What are some examples of Overlap statements?

OVERLAP

There is commitment overlap for Dr. XYZ between 5R01WE1234546-01 and the application under consideration. If this application is funded Dr. XYZ will request approval to reduce his effort on 5R01WE1234546-01 to 2 calendar months. If other pending applications are funded, Dr. XYZ will reduce his effort appropriately.

OVERLAP:

There is scientific overlap commitment overlap for Dr. XYZ between aim 1 of
5R01WE1234546-01 and aim 2 of the application under consideration. If this application is funded, Dr. XYZ’s effort will be adjusted on 5R01WE123456-01 to remove the overlap.

As noted above, the Institute/Center’s scientific program and grants management staff will review other support information prior to award.

Resolution of overlap occurs at the time of award in conjunction with applicant institution officials, the principal investigator, and awarding agency staff. NIH staff continue to monitor changes to other support information throughout the project as part of the annual progress reviews.

**FAQ Top**

**Q12: Does UCSF have any additional resources regarding Foreign Influence?**

A. Yes, the Ethics and Compliance website about Foreign Influence and Export Control.

**FAQ Top**

**Q13: If a PI has an appointment or receives resources from another entity, does this need to be reported internal at UCSF?**

A. Yes, this is considered a “Conflict of Commitment” and certain categories of outside activities require prior approval. PI should consult with their department chairs and/or use OATS (Outside Tracking System) to report activity.

**FAQ Top**

**Q14: For NIH Other Support, should we use Annual Direct Costs or Total Costs?**

A. NOT-OD-19-114 indicates using Total Costs; however, the Other Support blank format page and examples on NIH website (updated March 2020) still indicates to use Annual Direct costs, and some GMS have requested OS to use Annual Direct Costs. Best practice is to confirm with GMS the preference.

**FAQ Top**

**Q15: Is the department’s role w/ foreign influence just to help make faculty aware and direct them to appropriate offices? Or are we expected to verify all information against other sources of information? For instance, do we need to be vetting non-US sponsors of research against entities subject to Restricted Persons Screening?**
A. Yes, the department’s role is to ask faculty whether they are engaging with foreign entities for research purposes, and make faculty aware and direct them to appropriate offices. Postaward and OSR staff are not expected to verify all information against other sources of information outside of the financial system. If a faculty member mentions that they have a collaboration with a researcher at a foreign institution, Postaward and OSR staff should consider whether the activity requires reporting to NIH as Other Support or a Foreign Component, and make the faculty member aware that they need to report.

**Additional Resources:**

- RA Town Hall 09/09/19 slide deck ONLY SIDES related to the review of the NIH notice - NOT-OD-19-114
- COCR - Commentary on Disclosing Other Support and Other Resource in Research Funded by the National Institute of Health
- **Webinar: Other Support, Related Effort and RMS systems:** A webinar recording from the training opportunity describing other support, all personnel reports, effort reporting and over of RMS systems.
- **Presentation: Other Support, Related Effort and RMS systems:** Slide Deck from the training opportunity describing other support, all personnel reports, effort reporting and over of RMS systems.
- UCSF Ethics and Compliance website:Foreign Influence and Export Control