



UCSF

Research Administration Town Hall

December 13, 2023





Other Support Updates

Cathy Dunn, Office of Sponsored Research

Other Support – In the News

PRESS RELEASE

Stanford University Agrees to Pay \$1.9 Million to Resolve Allegations That it Failed to Disclose Foreign Research Support in Federal Grant Proposals

Monday, October 2, 2023

For Immediate Release

What Is Other Support?

NIH Grants Policy Statement [2.5.1](#) JIT Procedures

- Other Support is submitted as part of Just-in-Time (JIT) Procedures prior to award release and for changes in Key Personnel in the Research Performance Progress Report (RPPR).
- NIH IC program and grants management staff review other support of project Senior/Key Personnel prior to award to ensure that:
 - There are no scientific, budgetary, or commitment overlaps
 - Sufficient levels of effort are committed to the project
 - Only funds necessary to the approved project are included in the award
 - Any foreign resources that meet the definition of a foreign component have received appropriate prior approval

What Are Overlaps?

NIH Grants Policy Statement [2.5.1](#) JIT Procedures

- Scientific overlap occurs when
 1. Substantially the same research is proposed in more than one application or is submitted to two or more funding sources for review and funding consideration, or
 2. A specific research objective and the research design for accomplishing the objective are the same or closely related in two or more applications or awards, regardless of the funding source.

How Are Overlaps Disclosed?

- Overlaps in science, budget, or commitment are disclosed and addressed in an Overlap Statement for each Senior/Key Person listed on the Other Support.
- The statement should identify affected projects, describe the overlap and how it will be remedied ([Other Support Sample](#), [Examples of Overlap Statements](#))
- For example:
 - Relinquishment of duplicate award(s) if one application is submitted to two or more funding sources
 - Adjustment of budget in conjunction with OSR and agency staff for substantial duplication in research proposed on two or more applications
 - Adjustment of effort in conjunction with OSR and agency staff, when total time commitment exceeds 100%

What If Overlaps Are Found After JIT/RPPR Submission?

- Discovery of non-disclosure should be reported to the OSR staff with a revised Other Support as soon as it becomes known
- Resolution of overlap normally occurs at the time of award in conjunction with applicant institution officials, the principal investigator, and awarding Institute or Center (IC) staff. ([Other Support FAQ](#)).

Example Of Failure To Disclose

Scenario #1: Seeing Double?

Professor Du Plee Kit submits two applications for the same NOFO receipt date. The titles were identical except for one word. The applications were assigned to two different ICs and two different review groups. Both ICs funded their application within a few weeks of each other. JIT submitted did not disclose any overlaps. At the time of the RPPR, a review of Dr. Kit's updated Other Support raises concern when another funded application looks eerily familiar.

- NIH would ask, “If you cut the overlap out of one of the grants, would that grant be able to stand alone?”
- If not, NIH would make a judgement to terminate the grant and funds spent refunded to NIH

Example Of Failure To Disclose

Scenario #2: But I'm Working with Two Different Cell Lines

Dr. Kan Do submits two applications for the October 5 deadline. Both applications describe similar research methods but one application works on cell line A and the other application works on cell line B. The applications were assigned to two different ICs and two different review groups. Both ICs funded their application within a few weeks of each other. At JIT Dr. Do's Other Support does not disclose an overlap.

- Similar proposals were submitted conducting the same study but on different cell lines. Only the cell line changes but the method/research is the same.
- If you cut the overlap out of one grant would it be able to stand alone?
- NIH would ask Dr. Do to relinquish one of the awards.

Other Support Resources

- [OSR Website – Other Support](#)
 - Department and PI Checklist
 - DOD and NSF guidance
- [NSTC Research Security Subcommittee
NSPM-33 Implementation Guidance
Disclosure Requirements & Standardization](#)
 - Common Forms
 - Disclosure Tables