# **NIH "Other Support" Guidance**

Effective October 1, 2025, the University must ensure Program Director/Principal Investigator or other Senior/Key Personnel (generally, "Senior Personnel") fully understand their responsibility to disclose all resources made available to the 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. To comply with NOT-OD-25-133, the Research Office is providing this Guidance to personnel who have been identified as personnel on NIH proposals within the past two years or Principal Investigators who have submitted a proposal within the last two years.

## OTHER SUPPORT DEFINED

"Other Support" includes 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. This includes but is not limited to:

- Resources and/or financial support from all foreign and domestic 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.). 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 Senior Personnel will be conducting research as part of the consulting activities. 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.
- Travel supported or paid by an external entity to perform research activities with an associated time commitment. Travel supported or paid by an external entity to attend a conference or workshop is not other support.

Other Support <u>does not include</u> training awards, prizes, or gifts. Gifts are resources provided where there is no expectation of anything (e.g. time, services, specific research activities, money, etc.) in return. 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 as such, meaning that even funding directed to WVU Foundation may be considered Other Support to your research.

A more detailed chart of Requirements for Disclosure of Other Support, Foreign Components and Conflicts of Interest can be found here: <a href="https://grants.nih.gov/policy-and-compliance/policy-topics/foreign-interference/requirements-for-disclosure">https://grants.nih.gov/policy-and-compliance/policy-topics/foreign-interference/requirements-for-disclosure</a>.

# **NIH "Other Support" Guidance**

#### DISCLOSURE REQUIREMENTS.

**During Application.** All individuals designated as Program Director/Principal Investigator or other Senior/Key Personnel must disclose their Other Support on the NIH <u>form</u> and certify that the statements are true, complete and accurate. Further, when requested, individuals should update their Other Support electronically using the Just-in-Time feature in the eRA Commons. Other Support changes that could lead to budgetary overlap, scientific overlap, or commitment of effort greater than 12 person-months for the PD/PI(s) or any Senior/Key Personnel should be reported at that time.

**In Progress Reports.** All Director/Principal Investigator or other Senior/Key Personnel, excluding consultants, in progress reports when there has been a change in active Other Support. Specifically, under Section D.2.c of the Research Performance Progress Report, any change in the active other support should be reported.

**Foreign Activities and Resources.** For Other Support that include foreign activities and resources, WVU is required to submit copies of contracts, grants, or any other agreement specific to Senior/Key Personnel foreign appointments and/or employment with a foreign institution as supporting documentation. If they are not in English, recipients must provide translated copies. This does not include personal service contracts, or employment contracts for fellows supported by foreign entities.

# **EXCLUSIONS.**

**Program Directors and Training Grants.** 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.

## FAILURE TO DISCLOSE.

WVU's Obligation to Report. If WVU 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, WVU is required to submit updated Other Support to the Grants Management Specialist named in the Notice of Award as soon as it becomes known.

## QUESTIONS.

Please contact OSP Help@mail.wvu.edu with any questions or concerns about your reporting obligations or compliance with these obligations.