
Standard Operating Procedures & Policies

Category:	Proposals
Procedure No.:	200.03
Title:	Reporting of Other Support

I. Purpose & Overview

A. Purpose

To describe the Office of Research and Sponsored Projects' (ORSP) policy requiring the true, complete and accurate reporting of all sources of support for a faculty member's research and other sponsored activities.

B. Background

Prior to the issuance of an award or as part of the annual progress reporting process, many external funding agencies require that U-M provide a list of all active and pending sources of support for the participating faculty members' research and other sponsored activities. This requirement is primarily in place to assure the funding agency that (1) it is not providing funds for work that is already being supported by another source, (2) that all resources available in support of the researchers' work are being reported, including both resources received through the institution as well as those received personally by the faculty member, and (3) the participating faculty have sufficient time available to conduct the work that it will be funding.

The National Institutes of Health (NIH), for example, call this information **Other Support**, which 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 resources and/or 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.)."¹ NIH also specifies examples of what it deems as not "other support." These include such things as training awards, prizes, or gifts. " NIH requires under its Just-In-Time Policy that documentation of Other Support be submitted prior to award for all senior/key personnel; NIH also requires that this information be updated as necessary in the annual Research Performance Progress Report (RPPR).

The U.S. Department of Energy also requires the submission of Other Support, though its definition is broader than that of NIH. It includes "resources made available, directly or indirectly, to a researcher in support of and/or related to all of their professional R&D efforts, including resources provided directly to the individual rather than through the research institution, and regardless of whether or not they have monetary value (e.g., even if the support received is only in-kind, such as office/laboratory space, equipment, supplies, or employees). This includes resource and/or financial support from all foreign and domestic entities, including but not limited to, gifts, financial support for laboratory personnel, and participation of student and visiting researchers supported by other sources of funding. This further

¹ National Institutes of Health, Grant Policy Statement, §2.5.1, Dec. 2019, grants.nih.gov/grants/policy/nihgps/HTML5/introduction.htm

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includes compensation, for example, current or promises of future: grants, awards, funding, scholarship, appointment, sabbatical, travel, university directed funding, and honoraria.”²

The National Science Foundation (NSF), as a final example, calls this information ***Current and Pending Support***, and defines it as “all resources made available to an individual in support of and/or related to all of his/her research efforts, regardless of whether or not they have monetary value. Information must be provided about all current and pending support, including this project, for ongoing projects, and for any proposals currently under consideration from whatever source, irrespective of whether such support is provided through the proposing organization or is provided directly to the individual.”³ NSF requires that Current and Pending Support information be included at the time of proposal submission.

Note, the University of Michigan also requires disclosure of Outside Activities in the M-Inform system, as addressed in SPG 201.65-1, Conflicts of Interest of Conflicts of Commitment. Oftentimes, the outside activities disclosed in M-Inform must be included in reports of other support.

II. Procedure / Policy

The University of Michigan requires all researchers comply with all external funding sources’ requirements for disclosing active and pending sources of support. The university also requires that every disclosure to an external funding agency of a faculty member’s active and pending sources of support for research and other sponsored activities be true, complete and accurate to the best of the faculty member's knowledge. This requirement applies regardless of the source of support, the official recipient of the source of support (e.g. awarded to the institution or awarded to the individual), or when the disclosure is made (e.g., at proposal submission, prior to award acceptance, or as part of the annual progress report). For sponsor-required performance reports, full disclosure of all active and pending sources of support as required by the funding source is required.

ORSP requires that all investigators listed on a Proposal Approval Form (PAF) in the eResearch Proposal Management System (eRPM) answer questions regarding active and pending sources of support, and further attest that their answers are true, complete, and accurate. PAF questions related to active and pending sources of support must be accurately completed regardless of whether the sponsor requires disclosure of this information. Congruency of data provided in the PAF and M-Inform may be verified to ensure compliance with federal requirements for disclosure of active and pending sources of support.

ORSP recognizes the potential for duplication between disclosure of active and pending sources of support in eRPM and disclosures of outside support or interests in relation to potential conflicts of interest review in the M-Inform system. Disclosure of active and pending support in eRPM does not fulfil the separate obligation to disclose outside support or interests in the M-Inform system. All outside activities that constitute other support must be addressed via disclosure in the M-Inform system as well as through disclosure in the PAF system.

It is the investigator’s responsibility to ensure the accurate disclosure of active and pending sources of support, in accord with the application guidelines or the sponsor’s instructions. False, fictitious, or fraudulent statements or claims (including intentional omissions) in violation of this policy may result in criminal, civil, administrative or University penalties.

² Department of Energy, Order 486.1A Attachment 2, Sept. 4, 2020, www.directives.doe.gov/directives-documents/400-series/0486.1-BOrder-a

³ National Science Foundation, Proposal & Award Policy & Procedure Guide, June 1, 2020, www.nsf.gov/pubs/policydocs/pappg20_1/index.jsp