

Frequently Asked Questions – NIH Other Support Reporting

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I. How to submit updated Other Support. Process-related questions.

1. ***Should we use U-M’s new Other Support format going forward for JIT, RPPR, K08 applications, etc. or can we still use NIH’s old Other Support format?***

Answer: It is OK to use either version, as long as the required information is disclosed.

2. ***I’m confused about which category of Other Support I should use on U-M’s Other Support template. What should I do?***

Answer: Keep calm and carry on. Do your best and don’t worry. The categories on U-M’s template Other Support template are not prescriptive and are only intended to help guide your thinking to help ensure less obvious forms of Other Support aren’t overlooked. The important thing is to describe the resource in sufficient detail for an NIH program officer to understand the nature, source (including country) and relationship of the resource to the faculty member’s research endeavors.

II. Reporting Financial Sources of Support as Other Support

3. ***Are there examples of Other Support documents that include everything that should be reported by PIs?***

Answer: Please see <https://orsp.umich.edu/other-support> for an Other Support form template and examples.

4. ***Is this request specific to foreign Other Support or to all Other Support?***

Answer: This request is for all Other Support, domestic and foreign.

5. Should U-M startup support be reported as Other Support?

Answer: No, U-M startup support does not need to be reported as Other Support.

6. Should U-M gifts be reported as Other Support?

Answer: No, U-M gifts are not included in Other Support.

7. Do we report endowment funds as Other Support?

Answer: No, U-M endowed funds do not need to be reported as Other Support.

8. Should U-M discretionary funds be reported as Other Support?

Answer: Generally, no. U-M's position is that U-M discretionary funds generally fall into the same category of research support as internally funded start-up packages, which are excluded from Other Support.

Like U-M funded start-up packages, U-M discretionary accounts such as are provided through faculty incentive programs have no mandated line-item budget restrictions, scopes of work, specific aims, deliverables, effort commitments, start/end dates, or requirements for when funds must be expended.

Do note, however, that in the unlikely event a U-M discretionary account were to have any of the characteristics described above (i.e., mandated line-item budget restrictions, scopes of work, specific aims, deliverables, effort commitments, start/end dates, or requirements for when funds must be expended) and was separately accounted for the purpose of carrying out the so-called project, then it would need to be reported as Other Support.

Also note, any access to non-U-M discretionary funds (including any discretionary funds or start-up funds at any other institution) should be reported.

9. The template provided by ORSP includes a place to enter the total award amount. Does that amount include Facilities and Administrative (F&A) costs as well or just the Total Direct Costs (TDC)?

Answer: Per NIH guidance at <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html>, "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."

10. In the case where U-M is the subrecipient on an NIH award, should we name the other university that is directly receiving the funds and NIH, or just one of them?

Answer: Yes, identifying the originating sponsor and the pass-through entity from whom U-M is receiving a subaward is helpful.

11. I don't understand the category of "Other Grants, Contracts, Cooperative Agreements & Funds Not to U-M." If no funds are coming to U-M, how is there effort for the PI? And where do the dollar amounts come from?

Answer: You are right to wonder how this would work! And we hope there are very few, if any, awards to report in this category, as it would be a case where our faculty are senior/key personnel, with or without committed effort, on grants that have been awarded to another institution without a

subcontract or subaward through U-M.

12. Do I need to report as Other Support grants or contracts where I may be Co-I but have no effort?

Answer: Yes. NIH has emphasized that reporting is required for all resources that support or are related to all of your research endeavors. Serving as Co-I on a grant or contract would be part of your research endeavors.

13. Should U-M funds used for covering the NIH salary cap be reported as Other Support?

Answer: No.

14. If a postdoc in my lab is supported by an institutional NIH T32 is that considered Other Support?

Answer: No. Training awards from NIH are excluded from the definition of Other Support.

15. Do Rackham fellowships for grad students or U-M training grants for graduate students count as Other Support?

Answer: Yes. Training awards from organizations other than NIH must be reported as Other Support if they support your research.

16. One of the FAQs states that U-M training awards are an exception to required Other Support and a different FAQ states that the only NIH-funded training awards are excepted. Which is correct?

Answer: U-M interprets the NIH GPS as exempting ALL training awards from being reported as Other Support. That said, while a training award needn't be reported, a Graduate Student

Research Assistant (GSRA) who is supported by the training award and is working in an NIH-funded key person's lab should be disclosed as an in-kind source of Other Support.

17. Our NIH-funded center provides "seed" grants for early-stage projects. These projects do not allow PI effort but they do support the investigator's research. Should these seed grants be reported as Other Support?

Answer: Yes, the seed grant PI needs to report the seed grant as Other Support. The presence or absence of committed effort on the part of the senior/key person is not determinative in whether a grant should be included in Other Support. The entry should list the particulars of the seed grant PI, including a reference to NIH and the center grant as the sponsor.

18. How does the NIH Loan Repayment Program relate to Other Support?

Answer: The Loan Repayment Program is outside the scope of this request to update Other Support disclosures. Participation in the Loan Repayment Program does not, itself, trigger an obligation to submit Other Support. Participants in the Loan Repayment Program do not submit Other Support as part of their participation in the Loan Repayment program.

19. Do we need to add effort for faculty on non-sponsored P/Gs that are not tied to awards (e.g. a faculty member's 25% appointment on departmental fund)?

Answer: There does not need to be a relationship to a sponsored P/G in order for U-M funds to be reportable as OS. Similar to discretionary funds, a non-sponsored U-M P/G must be reported as OS if it is made available to the faculty in support of, or related to, the faculty's research endeavors and there are "sponsored project like" restrictions on the use of the funds (e.g., mandated line-item budget restrictions, scopes of work, specific aims, deliverables, effort commitments, start/end dates, or requirements for when funds must be expended). Note, any access to any internal funds at another institution (not U-M) should be reported as Other Support.

- 20. *The FAQs states that U-M training awards are an exception to required Other Support. What constitutes a training grant? I understand a T- 32 would be excepted, but what about fellowships (e.g. AHA, NSF)?***

Answer: Any fellowship that is classified by U-M as a training grant does not need to be included in Other Support.

III. Reporting Affiliations/Appointments as Other Support

- 21. *I have an appointment at another university. Should I report this as Other Support?***

Answer: Yes, appointments at another university should be reported as Other Support, including titled academic, professional, and institutional appointments whether or not remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary).

Question 3 of NIH's Other Support FAQ describes a similar scenario requiring Other Support reporting in which an NIH-funded PI has an unpaid appointment at a foreign university that allows her access to lab space, research materials, and staff. Per the NIH FAQ, "While the researcher is not receiving monetary compensation, the lab space, materials, and staff are resources made available to them in support of and/or related to their research efforts. Other payments, such as travel or living expenses must also be reported."

Note, an appointment at another university, even if unpaid, should be reported in M-Inform. Start-up funding, as well as salary, should be included in the value reported.

- 22. *Do we need to list a faculty member's U-M appointment as Other Support, or only appointments outside of their primary U-M appointment?***

Answer: You only need to report non-UM appointments as Other Support.

- 23. *I have a 9-month appointment at U-M. I spend two months at another institution during the summer conducting research under an award to that institution. Should I report this as Other Support?***

Answer: Yes. Please see the Other Support form template and examples at <https://orsp.umich.edu/other-support> for guidance on how to report this Other Support. As described

in Question 5 of NIH's Other Support FAQ, "available resources in support of and/or related to an investigator's research endeavors should be disclosed even if they relate to work that is performed outside of a researcher's appointment period."

Note, time spent in academic or research endeavors at another university should be reported in M-Inform. Start-up funding, salary (if applicable), etc. from the other university should be included in the value reported. If you are named in an award to the other institution, report the award in a separate disclosure. Email coi.support@umich.edu for detailed instructions.

24. *I am coordinating PI for multiple multicenter international clinical trials funded by Pharma. In this role, I also have a consulting agreement I report in M-Inform. Do I report my role as coordinating PI where I also serve as a consultant?*

Answer: NIH has emphasized that reporting is required for all resources that support or are related to all of your research endeavors. Serving as coordinating PI on a clinical trial would be part of your research endeavors.

To the extent that your role as a consultant makes resources available to you that support or are related to your research (e.g., access to research funding, in-kind access to lab space or staff; access to high-value materials not generally available to other researchers, etc.), it should be disclosed as Other Support.

Note, the time spent as a PI for Pharma/industry, even if unpaid, should be reported in M-Inform.

25. *Do we need to report consulting positions or scientific advisory board positions with companies in our Other Support?*

Answer: Consulting and scientific advisory board positions do not need to be reported as Other Support if they do not involve your performance of research activities. For example, providing input on the design of a study that will be conducted by other individuals would not trigger Other Support reporting requirements.

To the extent that your role as a consultant makes resources available to you that support or are related to your research (e.g., access to research funding, in-kind access to lab space or staff; access to high-value materials not generally available to other researchers, etc.), it should be disclosed as Other Support.

Note, these activities even if unpaid, should be reported in M-Inform.

26. *I am medical lead of a start-up company that was approved by the MEDCOI Board. I have stock options with the company. Does my role with the company or my stock options need to be reported in the Other Support?*

Answer: NIH has emphasized that Other Support should include a listing of all positions and scientific appointments related to all your research endeavors, whether or not remuneration is received. NIH has also emphasized that reporting is required for all resources made available to a researcher in support of and/or related to all of their research endeavors. Serving as medical lead of a start-up company would be part of your research endeavors.

To the extent that your role as medical lead makes resources available to you that support or are related to your research (e.g., access to research funding, in-kind access to lab space or staff; access to high-value

materials not generally available to other researchers, etc.), it should be disclosed as Other Support.

Note: Having stock (or stock options) in a start-up company does not, alone, constitute Other Support. However, if you have access to resources in support of and/or related to your research endeavors with a start-up company, that support should be included in your updated Other Support.

Also note, this activity and the stock options, should be reported in M-Inform.

- 27. *I received 20,000 shares (of >11 million issued) from a private biotech company in 2014, that are, practically speaking, worthless. Do I need to list my shares on my Other Support pages?***

Answer: No, this does not need to be included in Other Support, but it must be reported in M-Inform. For value, check the box next to the statement, “Equity Value Unknown (cannot be readily determined by public price or fair market value).”

- 28. *I have an ongoing foreign collaboration. I don't use their facilities, but I publish with them. They carry out lab studies, I do some computational work, and I help with the writing. Do these activities constitute "Other Support"?***

Answer: If the collaboration directly benefits your research, such as through your use of the collaborator's study results or modeling, the collaboration should be reported as Other Support. It may also need to be reported as a “Foreign Component” that requires prior approval from NIH.

- 29. *In 2019, I gave an invited talk at an NIH-funded conference. My travel expenses were reimbursed and lodging/food was provided. Should this be included in my updated Other Support?***

Answer: Reimbursed travel expenses for a talk that does not further your research do not require disclosure as Other Support. In certain circumstances, however, the travel expenses may need to be disclosed in M-Inform.

- 30. *In 2019, I participated in an NIH-funded workshop that led to a foreign collaboration where work for a particular manuscript may be supported by researchers at the other institutions. Should this activity be included in my Other Support?***

Answer: Analysis work or other substantive activities that are performed for the purpose of supporting a manuscript (e.g., confirmatory studies) should be reported as Other Support if they are performed as part of a collaboration that supports your research, including how your research is described in the manuscript. However, simply citing to other studies that were performed outside of a collaboration would not be considered Other Support. Note, if your collaborators were outside the U.S., it may also need to be reported as a “Foreign Component” that requires prior approval from NIH.

- 31. *I'm involved in a foreign collaboration where I work on a couple of their projects in exchange for an annual stipend (without a formal appointment) and travel support. Do I need to put anything in my Other Support?***

Answer: Yes. Your work on your foreign collaborator's projects would be considered part of your research endeavors, and any resources that are provided in support of that work should be reported.

- 32. *Many of our physicians will periodically travel to another country for 1-2 weeks to teach some sort of***

medical procedure at a foreign institute. Does this count as a visiting appointment?

Answer: If the faculty member has a formal appointment at the foreign institution, that appointment should be included in Other Support. Even in the absence of a formal appointment, if the activities at the foreign institution support or are related to the faculty member's research endeavors, then any related access to resources should be disclosed as Other Support.

These types of arrangements may also need to be reported as an outside interest in M-Inform.

33. *We have faculty who travel to other countries to present research at conferences. Is this Other Support?*

Answer: No, but depending on who pays for the travel, it may need to be disclosed in M-Inform.

IV. Reporting In-Kind Lab or Office Space, Equipment, Supplies and Materials Not Freely Available to Others

34. *Do we have to list reagents obtained via MTAs such as transgenic mice, antibodies, etc. as Other Support?*

Answer: It depends. Provision of high-value materials (e.g., biologics, chemicals, model systems, technology, etc.) that are not freely available to others and in-kind services and resources (e.g., office/laboratory space, equipment, employees) that are made available to you by a non-U-M source (including domestic and foreign universities, individuals, and companies) should be reported as Other Support. For example, a reagent is a reportable source of Other Support if it is made available to you by a non-U-M entity at a far lower cost than it is available to others.

35. *Should I include in-kind items like administrative support, lab space, and departmental computing under these new Other Support guidelines?*

Answer: You do not need to include in-kind items provided by U-M that are related to or support your research if they have already been included in the Facilities and Other Resources section of your proposal to NIH. Note, any in-kind items provided by an entity other than U-M that are related to or support your research should be included.

36. *Do we have to list equipment as Other Support?*

Answer: It depends. Provision of high-value materials (e.g., biologics, chemicals, model systems, technology, etc.) that are not freely available to others and in-kind services and resources (e.g., office/laboratory space, equipment, employees) that are made available to you by a non-U-M source (including domestic and foreign universities, individuals, and companies) should be reported as Other Support. For example, equipment is a reportable source of Other Support if it is made available to you by a non-U-M entity at a far lower cost than it is available to others.

37. *Can you define what is a "high value" material?*

Answer: No. NIH has not clarified what counts as a "high value" material. Our interpretation of what NIH has shared on the topic is that NIH is interested in seeing equipment/materials that have been made available to your faculty by a third party at a cost/rate that is unavailable to other researchers.

38. *We have a PI who receives in-kind materials for her research that are not available to anyone*

else. We have reported this item but cannot get a monetary value for it. What do you suggest we list for the monetary value? Is \$0 acceptable?

Answer: If you are unsure of how to quantify the monetary value of in-kind materials, state that these materials are “in-kind” and describe the materials and circumstances under which they were received in sufficient detail for a program officer to understand the receipt of materials.

39. *Should “free labor” (e.g., volunteer time of undergrad and graduate students) be included in Other Support?*

Answer: NIH's position is that they want to know about any foreign or domestic "resource" that is in direct support of, or related to, a faculty member's research endeavors, regardless of whether or not the resource has monetary value. (For instance, a program officer recently advised a U-M investigator that \$622 in peptides received from another university needs to be reported as Other Support.) We have accordingly been advising that resources that fall into the category of "free labor" be identified as "In Kind" Other Support.

V. Reporting Visiting Faculty/Scholars/Scientists/Post-Docs/Students Supported by Funds Not Managed By As Other Support

40. *A student in my lab is pursuing an independent research project. No funds are provided to my lab to support the student's research. The student's expenses are provided directly to the student by her home institution. Is this Other Support?*

Answer: Yes. Please see the Other Support form template and examples at <https://orsp.umich.edu/other-support> for guidance on how to report this Other Support.

41. *A visiting professor will be doing her sabbatical in my lab next year. She has full funding from her home university to cover her research expenses. I will not receive any external funds. Does this need to be reported as Other Support?*

Answer: Yes. Please see the Other Support form template and examples at <https://orsp.umich.edu/other-support> for guidance on how to report this Other Support.

42. *A visiting scholar is not receiving funding through U-M and is not associated with UM other than rotating for a few months in my research lab. Does this arrangement need to be reported as Other Support?*

Answer: Yes. Please see the Other Support form template and examples at <https://orsp.umich.edu/other-support> for guidance on how to report this Other Support.

VII. Reporting Foreign Collaborations/Components As Other Support

43. *How do we determine if an international collaborator needs to be included in the Other Support documentation?*

Answer: Include any international collaborations that constitute a “Foreign Component.” The

determining questions for evaluating whether the collaboration is a Foreign Component are: (1) does the foreign co-author perform any of the published research outside of the U.S., and (2) does the foreign collaborator's contribution to the NIH-funded work constitute a "significant scientific element or segment"?

In the normal course of managing an NIH award, a Foreign Component is identified in the proposal or, after the award is made, submitted to NIH for approval prior to the collaboration being initiated.