**FAS and SEAS Guidance on Complying with NIH Policy when Reporting Other Support**

**October 2019**

Recently, NIH issued notice [NOT-OD-19-114](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html), as well as related [FAQs](https://grants.nih.gov/grants/faq-other-support-foreign-components.htm), which has raised questions at Harvard and other research institutions about what is reportable as Other Support. The purpose of this guidance is to help Principal Investigators, researchers and staff determine what information should be included in Other Support. It is based on current agency policy and recent communication and is subject to change as additional clarifications are received from NIH.

Section 2.5.1 of the Grants Policy Statement (GPS) describes what is included in Other Support. By means of providing examples, the GPS includes all forms of financial resources limited only by whether such resource is “available in direct support of an individual’s research endeavors.” In addition to that key limitation, it also specifically excludes “training awards, prizes or gifts.” (The full text of Section 2.5.1 is excerpted at the end of this document.)

Notice NOT-OD-19-114 expands on the GPS. NIH expects disclosure of “… *all* resources made available to a researcher in support of and/or related to *all* their research endeavors…”. (Emphasis added) Additionally, any scientific, budgetary, or commitment overlap must be disclosed.

The other important limitations are role-based.

NIH requests [Other Support](https://grants.nih.gov/grants/forms/othersupport.htm) information for:

All individuals designated in an application as senior/key personnel, *except*  
1. Program Directors, training faculty, and other individuals involved in the oversight of training grants, and  
2. Individuals categorized as Other Significant Contributors  
  
All senior/key personnel, excluding consultants, in progress reports when there has been a change in active other support, *except*   
Program Directors, training faculty, and other individuals involved in the oversight of training grants

Below are two tables organizing common types of financial resources at Harvard into two categories: Institutional and External. Both tables list the type of resource and then address generally whether it would be included. Ultimately, whether something is determined to be included in Other Support comes down to whether all three of these questions can be answered with a yes:  
 Is the resource available?  
 If yes, is it for the direct support of research endeavors?   
 If yes, is it for senior/key personnel devoting measurable effort?

Finally, if a resource should be included, NIH requires that we, “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.” Please note that current NIH forms incorrectly request the annual award amount.

**Institutional financial resources**

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| --- | --- |
| **Type of Financial Resource** | **Is it Other Support?** |
| [Internal Awards](https://osp.finance.harvard.edu/establishing-internal-grant-making-program) (e.g., Milton Fund, Dean’s Competitive Fund, etc.) | Included in Other Support if the award is in direct support of a research project |
| Start-up funds | Start-up funds are discretionary funds and should be Included in Other Support if, and only to the extent that, funds have been identified as available for the direct support of the individual’s research endeavors |
| UD funds (e.g., FASIP, Fixed Price Balance Accounts, Royalties, etc.) | Same as start-up funds |

**External Financial Resources**

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| **Type of Financial Resource** | **Is it Other Support?** |
| Appointments (All positions, domestic and foreign, including titled academic, professional or institutional and regardless whether full-time, part-time, voluntary, adjunct, visiting, honorary, or if remuneration is received. | Include all external appointments as Other Support if held by senior/key personnel that are relevant to the application and regardless of whether awarded through Harvard, another institution or directly to the researcher. |
| Contracts | Included as Other Support regardless whether they are based at Harvard |
| Consulting Agreements | NIH has excluded Consulting Agreements from being reported as Other Support, however, if an individual’s independent external consulting supports their research endeavors it should be included. |
| Cooperative Agreements | Included as Other Support regardless whether they are based at Harvard |
| Foreign Scholarship Program | Included as Other Support, both for the Principal Investigator and any lab members |
| Foreign Talent Program | Included as Other Support, both for the Principal Investigator and any lab members |
| Gifts | Not included as Other Support |
| Grants | Included as Other Support regardless whether they are based at Harvard |
| In-Kind Resources  (e.g., office/lab space, equipment, supplies, employees, etc.) | Included as Other Support if available in direct support of the individual’s research endeavors. A monetary value does not need to be assigned to in-kind resources. |
| Other Resources  (e.g., 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.)) | Included as Other Support if available in direct support of the individual’s research endeavors This includes awards made directly to graduate students or postdoctoral fellows who are working on research in the researcher’s lab. |
| Prizes | Not included as Other Support |

[*Other Support*](https://grants.nih.gov/grants/policy/nihgps/HTML5/section_2/2.5.1_just-in-time_procedures.htm)*.* Information on other active and pending support will be requested as part of the Just-in-Time procedures. Other support includes all financial 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. Training awards, prizes or gifts are not included. Other support is requested for all individuals designated in an application as senior/key personnel-those devoting measurable effort to a project. 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.