

# Disclosing Other Support and Other Resources in Research

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## National Science Foundation(NSF)

NSF published a [draft](#) of the Proposal and Award Policies and Procedures Guide (PAPPG) (NSF 20-1) which includes clarifications regarding reporting requirements for disclosing research support and resources in research.

### 1. NSF Biosketch Appointments

NSF 20-1 PAPPG dated May 2019 specifies, “*Appointments include any titled academic, professional, or institutional position whether or not remuneration is received.*”

This includes any titles held (domestic or international, for profit or nonprofit, academic or professional) for senior personnel.

### 2. NSF Current and Pending

Section H. Current and Pending Support of the draft PAPPG 20-1 provides the following clarifications:

- All resources made available to an individual in support of and/or related to all of his/her research efforts must be provided for each senior personnel, regardless of whether or not such resources have monetary value. Such support must be provided irrespective of whether it is provided through the proposing organization or is provided directly to the individual.
- NSF revised the Current and Pending Support language submitted to OMB for final clearance to require In-kind contributions (such as office/laboratory space, equipment, supplies, employees, students) be reported as part of Facilities, Equipment and Other Resources. In-kind contributions not intended for use on the project/proposal being proposed must still be identified in Current and Pending Support. If the time commitment or dollar value is not readily ascertainable, reasonable estimates should be provided.
- NSF clarified in the PAPPG Comment table that the revised PAPPG submitted to OMB for final clearance removed the term "consulting" from the list of examples of "current and pending support." The revised language, however, does require that all resources made available to an individual in support of and/or related to all of his/her research efforts must be provided for each senior personnel, irrespective of whether such support is provided through the proposing organization or is provided directly to the individual.

### 3. Facilities, Equipment and Other Resources

NSF revised the PAPPG submitted to OMB for final clearance to specify that if the in-kind contributions (such as office/laboratory space, equipment, supplies, employees, students) is intended for use on the project being proposed to NSF, must be included as part of the Facilities, Equipment and Other Resources section of the proposal and need not be replicated in the individual’s Current and Pending Support submission.

### 4. NSF Applications and Progress Report

The NSF proposal application cover sheet asks if there are any international activities and what country/countries are involved. If yes, any involved countries should be listed here. Any changes in the status can be addressed in the yearly progress reports that must be submitted via Research.gov

### 5. Collaborators and Other Affiliations

The National Science Foundation (NSF) requires that Collaborators and Other Affiliations information must be separately provided for each individual identified as senior project personnel.

NSF intends to develop a set of Frequently Asked Questions (FAQs) to accompany the revised PAPPG, when implemented. These FAQs will specifically state that institutional startup packages from the proposing organization are not required to be reported

NSF will implement a new electronic format (or formats) [SciENev: Science Experts Network Curriculum Vitae](#) as an NSF-approved format for use in preparation of both the Biographical Sketch and Current and Pending Support sections of an NSF proposal.

**Reference:** <https://www.nsf.gov/bfa/dias/policy/>

### National Institutes of Health (NIH)

NIH Deputy Director, Dr. Francis Collins, issued a [letter](#) to the research community with NIH's three areas of concern:

1. Diversion of intellectual property (IP) in grant applications or produced by NIH supported biomedical research to other entities, including other countries;
2. Sharing of confidential information on grant applications by NIH peer reviewers with others, including foreign entities, or otherwise attempting to influence funding decisions; and
3. Failure by some researchers working at NIH-funded institutions in the U.S. to disclose substantial resources from other organizations, including foreign governments, which threatens to distort decisions about the appropriate use of NIH funds.

One of the most relevant emerging requirements includes clarification that all sources of support (both domestic and foreign) must be disclosed, including but not limited to: research support, financial interests, collaborations, affiliations, appointments, industry support, and support from private, foreign, state, or local governments. Disclosure is required for both academic and summer activities irrespective of whether the work provided through the proposing organization or is provided directly to the individual.

#### 1. NIH Biosketch Appointments

***Includes:*** all positions and scientific appointments both domestic and foreign; all titles academic, professional, or institutional appointments whether or not remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary).

List all positions and scientific appointments both domestic and foreign held by senior/key personnel that are relevant to an application including affiliations with foreign entities or governments. This includes titled academic, professional, or institutional appointments whether or not remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary).

Key personnel must disclose affiliations or appointments that are likely to be cited in NIH-funded publications in the biosketch section of the application.

#### 2. NIH 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 (in-kind) and regardless of whether they are based at the institution the researcher identifies for the current grant including all foreign and domestic entities; start-up packages and other forms of research support provided by other institutions; institutional grants and awards that are "separately budgeted and accounted; consulting and outside professional activities.

***Excludes:*** Gifts; prizes; start-up packages at the applicant institution; Endowed chairs and other endowment allocations; Outside activities that are not research (e.g., serving on a science advisory board for a start-up company where the investigator will not perform research) although this must be disclosed in Rice's COI process;

Report all resources and other support whether or not salary or compensation is requested. Information must be provided about all current support for ongoing projects, irrespective of whether such support is provided through the applicant organization, through another domestic or foreign organization, or is provided directly to an individual in support of their research efforts.

Report all current projects and activities that involve senior/key personnel, even if the support received is only in-kind (e.g. office/laboratory space, equipment, supplies, employees). All research resources including, but not

limited to, foreign financial support, research or laboratory personnel, lab space, scientific materials, selection to a foreign “talents” or similar-type program, or other foreign or domestic support must be reported.

The Council of Government Relations (COGR) provides their interpretation of specific items like gifts, prizes, institutional support, and start up packages. “COGR’s understanding that Other Support reporting still excludes gifts”. It is COGR’s understanding that investigators do not need report start-up packages at the applicant institution. However, key personnel must report start-up packages and other forms of research support provided by other institutions. It is also our understanding that institutional grants and awards that are “separately budgeted and accounted” per the Uniform Guidance, which are not considered start-up support by the applicant institution, must be reported. Endowed chairs and other endowment allocations do not require reporting.

### **3. Facilities, Equipment and Other Resources**

***Includes:*** *Visiting researchers to the lab who are paid directly by outside sources or anyone who is expected to work directly on the proposed project; in-kind support uniquely available to the key personnel such as laboratory space, scientific material, major equipment, personnel, etc.;*

NIH application instructions have long required reporting of non-financial resources (e.g., office/laboratory space, equipment, supplies, employees) that will benefit the proposed research. Reporting of non-financial resources is required in the Facilities and Other Resources section of the grant application. The Notice includes a requirement to also report in-kind resources and other collaborators (domestic and foreign) as Other Support. Note that in-kind resources could also include visitors to the institution’s lab who are paid directly by outside sources.

Report in-kind support, such as a laboratory space or major lab equipment, particularly in support of research performed outside the applicant institution (though the OS form wasn’t designed for such reporting). Institutions may choose to report in-kind support in the Facilities and Other Resources or Other Support sections of the application, as long as the information is clearly disclosed.

It is COGR’s understanding that key personnel are only required to report those resources that are uniquely available. Institution-wide resources such as core facilities or shared equipment that are made broadly available need not be reported. Further, if information is reported as Facilities and Other Resources, it does not *also* need to be reported as OS if the information is clearly disclosed. Visiting researchers compensated directly through outside resources, or anyone who is expected to work directly on the proposed project, should include details of the individual’s contributions in the Facilities and Other Resources or Other Support section of the application. Further, if anyone, including visitors, dedicates at least one month of effort to the project in the budget year, whether or not the effort is compensated, the details must be reported in the annual report (i.e., RPPR) under current NIH policy.

### **4. Research Performance Progress Report (RPPR)**

***Includes:*** *All personnel or individuals including visiting researchers (domestic or international) with at least one month of effort to the project in the budget year, whether or not the effort is compensated;*

All foreign involvement should be disclosed on your other support at the proposal stage and any changes or new involvement should be reported using the updated other support in your progress report (RPPR).

If other support, as described as above, is obtained after the initial NIH award period, from any source either through the institution or directly to senior/key personnel, the details must be disclosed in the annual RPPR.

Personnel that dedicate at least one month effort to the project whether or not salary is compensated. Visitors, dedicates at least one month of effort to the project in the budget year, whether or not the effort is compensated, the details must be reported in the annual report (i.e., RPPR) under current NIH policy.

### **5. NIH Application: Foreign Component:**

The NIH Notice contains a reminder that grant recipients are required to monitor foreign activities and seek prior approval for such activities, including when new activities arise during the term of the award. The Notice includes an additional requirement that even if the activity does not rise to the level of a Foreign Component, it must still be reported as OS. The Foreign Components must meet two criteria, per the GPS:

- *A portion of the project will be conducted outside of the U.S., and*
- *The institution must determine if the activities are considered significant. Some examples of activities that may be considered a significant element of the project include, but are not limited to:*
  - *collaborations with investigators at a foreign site anticipated to result in co-authorship*
  - *use of facilities or instrumentation at a foreign site*
  - *receipt of financial support or resources from a foreign entity*

*If both criteria are met, then there is a foreign component.*

*If an activity does not meet the definition of foreign component because all research is being conducted within the United States, but there is a non-U.S. resource that supports the research of an investigator and/or researcher, it must be reported as other support.*

Informal collaborations with international researchers could meet the NIH definition of a Foreign Component. However COGR's assessment is that a joint publication with a foreign collaborator is not considered a Foreign Component if the research was performed in the US, even if the publication occurs after the international visitors return to their home institution.

#### 6. NIH Just-In-Time (JIT)

All pending support at the time of application submission and prior to award must be reported using "Just-in-Time Procedures" by providing all information indicated above. Applicants are responsible for promptly notifying NIH of any substantive changes to previously submitted JIT information up to the time of award, including "Other Support" changes that must be assessed for budgetary or scientific overlap.

**Resources:** [NOT-OD-18-160](#) ; [NOT-OD-19-114](#) ; [FAQ](#) ; [COGR Commentary on Disclosing Other Support](#)

### Department of Energy (DOE)

The Department of Energy issued [Order 486.1](#), Department of Energy Foreign Government Talent Recruitment Programs prohibiting DOE federal and contractor employees from participating in certain foreign government talent recruitment programs.

Resources: [Order 486.1](#)

### Department of Defense (DOD)

DoD issued a [memo](#) that all new DoD Notices of Funding Opportunities (NFOs) pertaining to research and research-related educational activities shall require proposers to submit the below information for all key personnel, whether or not the individuals' efforts under the project are to be funded by the DoD:

- A list of current projects the individual is working on, as well as any future support applied for regardless of source
- Titles and objectives of the other projects
- Percentage per year devoted to the other projects
- Total amount of support the individual is receiving or will receive
- Name and address of agencies and/or other parties supporting other projects
- Period of performance for the other projects

In a [Letter to Universities](#), DoD reminds the research community for the need for research personnel to fully disclose conflicts of interest and commitment. *“all research and research- related educational activities conducted through DoD research grants, cooperative agreements, Technology Investment Agreements, and other non-procurement transactions require key-personnel to disclose all current and pending projects, time commitments to other projects, and funding sources at the time of application.”*

**Resources:** [Memorandum Actions for the Protection of Intellectual Property, Controlled Information, Key Personnel and Critical Technologies](#) ; [Academic Letter to Universities](#)