Harvard Supplementary FAQs
for NIH Other Support

Before you use this document, please review the latest [National Institutes of Health (NIH) Frequently Asked Questions (FAQs) on Other Support, which are updated frequently and without notice](). The Harvard responses below are meant to supplement the NIH FAQs.

Other Support documents must be reviewed and authorized by an AOR (authorized organizational representative) in your school's central submitting office (OSP, HMS ORA, or SPH SPA) prior to submission to NIH or to the prime submitting/awardee institution when Harvard is a subrecipient. Therefore, **JIT and RPPR requests for all awards, including those where Harvard is a subrecipient under an NIH prime award, must be entered into GMAS for review, in accordance with your school's/submitting office's deadline policy and procedures**.

Note that the term "reporting individual" is used throughout this guide to denote the Principal Investigator (PI) or other Senior/Key Personnel required to submit Other Support information.

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OTHER SUPPORT: SUMMARY OF CHANGES

Clarifications and new requirements effective as of May 25, 2021, and January 25, 2022:

- **Revised Other Support format.** NIH issued a new Other Support form (rev. 10/2021) effective as of January 25, 2022. The new format for Other Support applies to all submissions, including Just-in-Time (JIT) and Research Performance Progress Report (RPPR). The form contains the certification language for signature of the reporting individual.

- **Signatures**. Each reporting individual (PD/PI or other Senior/Key Personnel) must electronically sign their Other Support form as a PDF prior to submission to NIH (but after review by their central office), certifying as to the accuracy of the information submitted. Delegation of signatures is not allowed.

- **Clarification on gifts vs. in-kind support**. Gifts are resources provided where there is no expectation of anything (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; it is an in-kind contribution and must be reported as Other Support. Please check with your central office if you are not sure whether a specific source of funding qualifies as a gift.

- **Research consulting**. Inclusion of consulting as Other Support, when the reporting individual will be conducting research as part of the consulting activities. Note: Harvard researchers are expected to maintain updated disclosure information in the University OAIR (Outside Activities and Interests Reporting) system that includes all outside activities.

- **Foreign agreements**. Unredacted copies of contracts, grants, or other agreements specific to senior/key personnel foreign appointments and/or employment with a foreign institution for all foreign activities and resources that are reported in Other Support must be attached as supporting documentation. If the contracts/agreements are not in English, recipients must also provide translated copies. It is the reporting individual's responsibility to provide the translated versions when submitting Other Support. (Machine translations, such as Google Translate, are acceptable.)

- **Undisclosed other support**. Immediate (within 30 days of discovery) notification to NIH of previously undisclosed other support is required.

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GENERAL QUESTIONS

Mentor Current & Pending Support for K award applications.

With the January 25, 2022 changes to NIH Other Support, are there any changes to the format of the mentor's Current and Pending Support in Mentored Career (K) Applications, or is it the same?

Mentors' Current and Pending Support requirements for K award applications have not changed with the January 25, 2022 revisions.

There are a few key differences, however, between mentors' Current and Pending Support included in a K award application and the mentor Other Support submitted at JIT stage. The NIH application Form G instructions for mentors' Current and Pending Support indicate that the mentor include only the current and pending research support relevant to the applicant's research plan, that percent effort and overlap statement be excluded, and that the document be limited to 3 pages. NIH recently clarified that the research support for this document is limited to the mentor's projects; they should not include other types of financial support or in-kind contributions on their Current and Pending Support.

Additionally, per the NIH Other Support FAQs, mentors must include total costs, rather than annual direct costs, when reporting current and pending support within K award applications. NIH requires that the mentor's Current and Pending Support submitted in a K application include the standard Other Support certification language and the mentor's electronic signature. The attachment must be submitted as a flattened PDF, and the original unflattened version must be maintained by the applicant institution.

At JIT the mentor should be treated as any other reporting individual and a full Other Support (with in-kind, other support, and foreign agreements attached, as applicable) should be submitted along with the applicant's Other Support.

If a reporting individual is a mentor on a Mentored Career (K) award and Harvard is not the submitting institution for the application how are the "Current and Pending Support" at application stage and Other Support at JIT stage reviewed and tracked by Harvard?

Review of a mentor's Current and Pending Support and Other Support documents when the mentor is based at Harvard, but when Harvard is not the submitting institution, will be coordinated via emails between the Central Reviewers and the Grant Mangers, since there is not a supported request type in GMAS for this situation. Once the review of the documents is complete, the final unflattened, signed version of the documents should be uploaded by the central submitting officer reviewer into the mentor's person document repository in GMAS and should be saved indicating the applicant PI and date submitted as part of the file name for both the Current and Pending Support and the Other Support (if needed at JIT stage).

What needs to be included as Other Support?

I am a reporting individual and I have multiple appointments at different institutions (including an unpaid appointment), and I also have awards based at multiple institutions. Do I need to report all of this on my Other Support?

A reporting individual must list on his/her Other Support all resources made available to him/her in support

of all their research endeavors. NIH does not exclude resources with no monetary value, such as lab space, nor does it exclude resources that are available to the reporting individual at the multiple institutions where the reporting individual has appointments and/or awards. The reporting individual may need to request this information from other institutions to ensure that a complete and accurate Other Support is submitted.

How do I report a supplement to a prime award?

NIH has indicated that "*institutions should report on the project period dates and total funding amounts listed on the most recent Notice of Award.*" This means that awarded supplement dollars and effort (if applicable) should be included within the reporting of the main award. Within the Major Goals section for the project, include a brief statement of the supplement project goals. If a supplement has been submitted and is still under review for funding, it should be included in the Pending Projects section of the Other Support document.

Are there differences if the reporting individual is reporting on a "part-of account" versus a subaward?

The NIH instructions state, "***When providing Other Support under a consortium/contractual arrangement or that is part of a multi- project award:*** *Indicate the project number, Name of PD/PI, and source of support for the overall project. Provide **all** other information (e.g., total award amount, person months) for the subproject only.*" If a Harvard part-of account represents a subproject of a multi-project award (such as a program project/NIH P award), when reporting the "part-of account" or subproject, the above instructions should be followed.

If the Harvard part-of account is on a standard research project, such as an NIH R01 (NOT a multi-project award), the reporting individual should indicate the overall award amount, not just the part-of account obligation. A note may be added to the award, indicating the portion of the total award amount available for the specific reporting individual's part of the project.

When reporting on a main award with subprojects, a reporting individual must report the entire award amount on their Other Support, even if a significant portion of the funding is being distributed to subprojects (subawards and/or part-of accounts). If desired, a note may be added indicating the portion of the total award amount that is available for the reporting individual's projects on the award.

Note that Other Support must be reviewed and authorized by an AOR (authorized organizational representative) in your school's central submitting office (OSP, HMS ORA, or SPH SPA) prior to submission to NIH or to the prime submitting/awardee institution when Harvard is a subrecipient. Therefore, JIT and RPPR requests for all NIH awards, including those where Harvard is a subrecipient under an NIH prime award, must be entered into GMAS for review, in accordance with your school's/submitting office's deadline policy and procedures.

Do conference grants with no effort requirement need to be included on Other Support?

Grants which provide support solely for conferences and scientific meetings (i.e., which do not support research) do not need to be included as Other Support.

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Should reporting individuals report appointments on advisory boards on their Other Support?

These appointments should be reported on the Biosketch, but they also need to be disclosed on Other Support if the reporting individual is conducting research as part of his/her role on the board, or if the appointment provides them access to resources for use in their own research endeavors.

Do reporting individuals need to list outgoing agreements, such as material transfer and data use agreements, on Other Support?

Outgoing material transfer and data use agreements are not included on Other Support unless the agreement also includes a commitment of the reporting individual's effort, collaborative research elements, or the reporting individual is receiving something in support of his/her research in return for use of the materials/data. If the agreement contemplates collaborative activities or the receipt of other resources which support the reporting individual's research, such activities or resources should be listed in the In-Kind section of the Other Support. (See Valuation of In-Kind Contributions.)

How should reporting individuals who are "HHMI Investigators" report their funding from HHMI on their Other Support document?

Reporting individuals who are employed by HHMI and who receive general support as HHMI Investigators should report the funding as in the following example, listed within the **Other Resources/Support** section of the Harvard Other Support template:

> HHMI Investigator (PI Last Name)   MM/DD/YYYY - MM/DD/YYYY
> Howard Hughes Medical Institute $1,500,000 DC ($0 IDC)
>
> HHMI is Prof. [Last Name]'s employer and funds are not considered grant support. That said, these funds are used to support [general scope of research] in [Last Name]'s lab.

How should an award paid in foreign currency be listed on Other Support?

NIH has indicated that "*Institutions should report on the project period dates and total funding amounts listed on the most recent Notice of Award.*" NIH has not given guidance beyond this; however, we suggest that you include both the foreign currency amount indicated on the Notice of Award and the current equivalent in US dollars listed in GMAS as the **anticipated amount**. For example:

> Total Award Amount (including Indirect Costs): €44,102, *($50,000 conversion as of Other Support submission)*

Questions about effort

Should person months be listed per budget period on NIH Other Support (unlike NSF, which allows *fiscal years* for reporting effort)?

NIH Other Support should reflect the individual's actual effort for the award's current budget period, expressed in person months (calendar, academic, or summer). For pending awards, list the proposed effort for the first budget period.

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Do reporting individuals need to include their effort on Billing Agreements with affiliated institutions on their Other Support?

Yes. If a Harvard PI/Key Personnel is performing research at an affiliate institution via a billing agreement, their effort on the billing agreement must be included in their Other Support, under Projects/Proposals.

Should the committed effort from the Research Team in GMAS be listed, or the reporting individual's actual effort?

The reporting individual should list their actual effort amounts on their Other Support.

What about projects on which the reporting individual is performing work, but has no committed effort?

The reporting individual must estimate their level of effort for the work being performed, regardless of the effort commitment reported to the sponsor.

What about summertime effort?

Summer effort that includes research still needs to be reported as Other Support. NIH does not make a distinction among activities that occur "outside" of the academic year.

How would a reporting individual represent an approved No-Cost Extension (NCE) year in the Other Support Effort table? What level of effort should be listed if the NCE is not yet active for a current project?

NIH has not offered clarification on this beyond noting that "*Institutions should report on the project period dates and total funding amounts listed on the most recent Notice of Award.*" We believe the best practice would be to list the NCE year as in the example below. The example shows Year 5 as the "active year" with the actual effort for the current year. The effort for the NCE year should be the anticipated actual effort to be expended during the NCE in that year, since an NCE year will not have "committed effort" level.

Year (YYYY)	Person Months (actual effort) (##.##)
5. 2022	1.2
5. 2023 NCE	0.3

How would a reporting individual list effort in the Other Support Effort Table if the project is currently in a No-Cost Extension (NCE) year?

The effort for the NCE year should be the actual effort.

Year (YYYY)	Person Months (actual effort) (##.##)
5. 2023 NCE	0.3

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GIFTS

The definition of gifts seems to have narrowed for NIH. What gifts, if any, now need to be included in Other Support?

Gifts should not be reported in Other Support. As a reminder, gifts are resources provided where there is no expectation of anything (e.g., time, services, specific research activities, money, etc.) in return.

Should internal funding awarded under gifts to Harvard (e.g., Blavatnik Accelerator, Deans' Awards) be considered "gifts" or should they be listed as Other Support?

If the funding was originally from a gift source but is awarded to the reporting individual through an internal competition to support a designated research purpose (i.e., a project with a defined scope of work and period of performance), then it should be reported as Other Support under the header "Projects/Proposals."

Should reporting individuals list gifts on Other Support if the gifts specifically support their research endeavors?

NIH has indicated that gifts, which are given whereby the donor is not receiving anything in return or in exchange, should not be listed on Other Support. Awards which do stipulate that something (e.g., time, services, specific research activities, IP rights) is to be provided in return are not true gifts and should be reported in Other Support regardless of Harvard's internal classification.

Sometimes a PI discusses a project with a potential sponsor which is expected to be a grant submission, and at the last moment the sponsor says they can award it as a gift. In the PI's mind the funds are for a specific project, but the legal agreement is for a gift. Do we need to disclose gifts with this sort of history?

If the agreement has any terms or conditions that disqualify it from being designated a gift by the University, such as a time commitment, it should be entered into GMAS (as NG) and will need to be reported as Other Support if the funds are used to support research activities.

IN-KIND CONTRIBUTIONS

Do Grants Managers have direct access to all information that will need to be listed as In-Kind Support and Other Resources/Support for the researchers they support?

In most cases, grants managers will not have direct knowledge of all support that may need to be reported as In-Kind Contributions or Other Resources/Support. The reporting individual will need to provide this information directly, either by entering the information on their Other Support page themselves or sending their grants manager the information that needs to be added.

If a reporting individual has a dual appointment with Harvard and one of its affiliated hospitals, and

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through the secondary appointment the reporting individual gets a discount on certain items/services within the hospital, is this discount considered an in-kind contribution reportable on Other Support if it is related to his/her research?

Since this discount would be "broadly available" to all the hospital appointees using the items/services, this would not need to be disclosed as an in-kind contribution for Other Support.

Personnel as in-kind resources: employees, students, postdocs, or visiting scholars funded by an external entity

For externally funded individuals reported as an in-kind resource on my Other Support, what information should be included?

Per the NIH Other Support instructions, provide the individual's name; the source of their external funding; a summary of their in-kind contribution (e.g., briefly describe the research they are performing on your project(s) that is not compensated from your Harvard grant or institutional funds); if applicable, the project dates associated with their support of your research; the place of performance (Harvard); and if applicable, their effort contributing to your research. NIH does not require both a dollar value of the in-kind contribution and level of effort, but at least one of these needs to be reported. (See Harvard's Other Support Guide.)

How do I determine whether a student or postdoc I'm mentoring needs to be reported as an in-kind resource on my Other Support?

If the postdoc or student is supported by an outside source, and they are performing research activities in support of your research endeavors, their support must be reported as an in-kind resource on your Other Support. If the relationship is solely a mentor/mentee arrangement, with no such research activities performed by the mentee, then it is not a resource and does not need to be reported.

Is there a minimal amount of time in the lab that is not considered significant enough to include?

NIH has not provided a minimum level of time/effort required for reporting as other support.

What if an externally funded student, post-doc, or visiting researcher is conducting their own research in my lab, rather than supporting my research activities? Does that individual need to be included as an in-kind resource on my Other Support?

If the relationship is solely a mentor/mentee arrangement, then it is not a resource available in support of your research and does not need to be reported. In cases where there is no clear distinction between your research projects and those of the externally funded researcher, Harvard recommends you err on the side of reporting their effort as your Other Support.

If externally funded personnel are from a nearby hospital, other university, etc. with which they maintain a primary affiliation, and they are working on my research, should they be included on my Other Support?

Yes, as an in-kind resource.

If an individual working on my research is self-funded, are they still considered in-kind resources?

Yes, and they must be reported as such on your Other Support.

Does the source of the external funding support matter (e.g., a Fulbright scholar vs. a foreign government, or a foundation vs. private entity)?

No. All externally funded personnel who are working on your research projects and who are paid (or self-funded) from sources other than your research support must be reported as an in-kind resource on your Other Support.

Research Collaborations

Do I need to list my collaborations as in-kind resources on my Other Support?

You need to include all resources (provided within the past three years that are still in use) that are uniquely available to you and that directly benefit your research. Resources provided by collaborators may include data, materials, personnel, use of equipment, etc.

Would Other Significant Contributors (OSCs) be listed as in-kind resources on Other Support?

No, the OSC (or their participation on the project) should not be included on the reporting individual's Other Support. Rather, if the OSC is providing a unique resource (e.g., tissue samples, data) to the reporting individual for use on the project for which the OS is being submitted, the *resource* should be included on Facilities and Other Resources. The same resource should be included on the reporting individual's Other Support submitted for other NIH projects.

Valuation of in-kind contributions

How should I report the value of students, trainees, and other externally funded personnel working on my projects?

Provide an estimate of their contribution *to your research endeavors*: either their time commitment to your projects or the dollar value associated with that time (i.e., the salary they would be paid if they were funded from the award).

How is Harvard defining "high-value" for in-kind resources?

Information on high-value materials received from collaborators must be included within the in-kind

contributions section of Other Support. Include the source, a summary of the in-kind contribution, and the estimated value. For this purpose, Harvard defines "high-value" as being uniquely valuable to your research or otherwise having a market value at least equivalent to the capital equipment threshold, currently $5,000 per item. Should this change, we will provide updates.

How is Harvard defining "not freely available" or "broadly available" as it applies to in-kind resources?

NIH FAQs state, *"recipients must use professional judgement to determine whether a resource is made broadly available and apply these principles consistently across the institution."* Harvard defines "not freely available" to the research community as a resource/contribution that is available only to the individual, or to the individual's lab/group/office. Resources which are publicly available, or broadly available to the research community upon request, are excluded from this definition and do not need to be reported as Other Support.

Does the in-kind resource need to be both "high-value" and "not freely available" in order to be reportable as Other Support?

Harvard's understanding is that only resources which meet both criteria, i.e., which are high-value *and* not freely available, need to be reported as Other Support.

What about data or materials that I receive from another institution, including under a DUA or MTA?

Data and materials received from another institution, including under a DUA or MTA, that are both high- value and not freely available should be reported as Other Support. Consistent with the above, data and materials which are publicly available, or broadly available to the research community upon request (notwithstanding that entry into a DUA or MTA is required by the provider), are considered "freely available" and do not need to be included.

How would I estimate the value of an in-kind resource?

The reporting individual will need to make a reasonable estimate, which may include comparing the market value of similar resources and accounting for depreciation and any relevant discounts. If a Harvard office could help, e.g., the licensing office or a service center, we recommend utilizing their expertise. If after reasonable diligence the reporting individual determines there is no ascertainable value (i.e., the resource has no market equivalent), the Other Support document may state "No market value."

CONSULTING ACTIVITIES

The NIH has stated that "*Consulting that falls outside of an individual's appointment, separate from institution's agreement, must be disclosed as Other Support.*" Does this include the consulting that faculty perform outside of Harvard under the 20% rule?

Per NIH, when a reporting individual will be conducting research as part of their consulting activities they must report it as other support, regardless of whether it's considered a permissible "outside activity" to Harvard.

What kinds of consulting activities could be considered "research" for the purposes of inclusion in Other Support?

Conducting research as part of consulting is to be responsible for the design, conduct, or reporting of research, regardless of title or position (i.e., an Investigator). This definition does not normally include service on scientific or clinical advisory boards or more general scientific consulting unless the reporting individual is anticipated to make a direct and significant intellectual contribution to a specific research project for the entity.

Does the research consulting need to be related to their Harvard research?

NIH Other Support includes *all* resources made available to a reporting individual 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. Therefore, we interpret "related to your research" to refer to all research, not just Harvard research.

For research consulting that needs to be included as Other Support, how do we report time and dollar amount? Does effort need to be listed?

NIH clarifies that consulting should be captured as an estimate of the amount paid, rather than time and effort reflected in calendar months. Therefore, consulting does not typically count towards the reporting individual's 12 calendar months of total effort. Note that if the consulting is being done for or on behalf of a foreign institution or entity, any related agreements (and an English translation) should be appended to the Other Support document (see section on "Supporting Documentation").

Where exactly on the Other Support pages should consulting activities be listed? Is this a separate section of the document?

Research consulting activities should be included under the "Other Resources/Support" header of the Harvard NIH Other Support template.

SUPPORTING DOCUMENTATION

NIH NOT-OD-21-073 states: "*For Other Support submissions that include foreign activities and resources, recipients are 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 supporting documentation must be provided as part of the Other Support PDF following the Other Support Format page.*" What does this guidance mean?

If the reporting individual has executed a grant, contract, or other type of agreement with a foreign entity, and if the agreement involves either (i) the conduct of research or (ii) the provision of resources to support

that individual's research (per the NIH definition of Other Support), the foreign agreement and an English translation of the agreement must be appended to the end of the reporting individual's Other Support document, in addition to including the activity and/or resource as Other Support. It is the reporting individual's responsibility to have their agreements translated to English and to provide the translated copies to Harvard when submitting their Other Support.

Note that Harvard requires that all outside foreign agreements that involve the conduct of research, the provision of resources in support of an individual's research, or a foreign appointment and/or employment (including consulting) with a foreign institution, be submitted by the reporting individual for institutional review prior to the relationship being reported to the NIH.

If a reporting individual receives grant funding from a foreign sponsor, does the award agreement need to be included as supporting documentation?

The supporting documentation requirements apply only to outside foreign agreements held by the individual. If the sponsored agreement was executed by Harvard – i.e., the award is set up as a sponsored project in GMAS -- it should be reported on Other Support under the Projects header, but the agreement itself does not need to be attached as supporting documentation. However, if an agreement is providing funding from a foreign entity directly to the reporting individual (i.e., as an outside activity, not a sponsored award to Harvard) for the purpose of conducting research or otherwise in support of the individual's research, the funding both must be included as Other Support and a copy of the agreement attached to the individual's submission.

Do both the original (foreign language) copy of the agreement, as well as the translated version need to be attached?

Yes. NIH requires the submission of foreign contracts, grants, or any other agreements specific to senior/key personnel foreign appointments and/or employment with a foreign institution, as supporting documentation to the Other Support submission. If the original contract is not in English, we must also provide a version translated into English. NIH has further clarified that it will accept machine-read translations (e.g., Google Translate). Any costs associated with producing such translations are not typically allocable to a specific NIH grant project and are therefore not allowable as a direct cost. It is the responsibility of the reporting individual to have foreign language agreements translated into English.

Will NIH "share" any submitted agreements among institutes? Or will such agreements need to be attached to each of the reporting individual's Other Support submissions indefinitely, at least until a specific agreement period has ended?

To ensure that Harvard meets the NIH supporting documentation requirement, the foreign agreement(s) should be attached to each of the reporting individual's Other Support submissions, until the period covered by the agreement has ended.

What if the reporting individual has signed a Non-Disclosure Agreement (NDA) with the foreign entity that precludes disclosure of the terms of their engagement, or the supporting documentation is otherwise

marked as "Confidential"? Do they still need to provide the associated foreign contract/agreement to NIH?

Yes. Per the NIH FAQs: *"NIH needs access to all information necessary to make an informed judgement about possible scientific, budgetary, or commitment overlap and to make an informed judgment about management of possible significant financial conflicts of interest. NIH handles confidential and sensitive information in accordance with our cybersecurity requirements and requires submission of complete documentation."* Additionally, NIH has made it clear that signing an NDA does not supersede the requirement to submit an agreement.

What about agreements between a foreign collaborator and Harvard (including unfunded Collaboration Agreements)?

As the agreement was executed through Harvard, the contract itself does not need to be attached as supporting documentation. However, *resources* made available through agreements between Harvard and a foreign collaborator should be reported as in-kind resources on the reporting individual's Other Support.

If we sign Material Transfer Agreements (MTAs) with foreign institutions, do we need to provide these as supporting documentation?

No, as stated above, agreements executed by Harvard do not need to be included as supporting documentation. If, however, the MTA(s) governs the receipt of materials that are related to your research and are both high value and not broadly available, you need to report the materials as in-kind resources on your Other Support.

What if there is no formal agreement related to the reporting individual's foreign outside activities or resources? Do they still need to be reported as Other Support?

Yes. All resources made available in support of, or otherwise related to, the reporting individual's research should be included as Other Support, regardless of the type or existence of supporting documentation.

ELECTRONIC SIGNATURES

The reporting individual's electronic signature is required on all Other Support submissions. What constitutes an electronic signature?

Researchers may use the electronic signature of their choice. Adobe PDF e-signatures are Harvard's preference (see the Electronically Certify and Sign a PDF Document guide). You will know that the signed document meets the certification requirements if moving the cursor over the signature enables you to click into the metadata.

Can the reporting individual provide a handwritten (wet) signature on their Other Support? What about an electronic image of their written signature?

No, NIH will only accept electronic signatures. The signature cannot be typed in or signed with ink. Additionally, scans of wet signatures are not permissible, nor is placing an image of their signature on the document.

If the reporting individual approves, can the grants manager apply the PI's electronic signature to the Other Support?

No. The reporting individual must review their finalized Other Support document and electronically sign the document themselves, certifying that the information on the document is complete and accurate. Having anyone else sign their Other Support would be fraudulent.

The instructions state that after the reporting individual electronically signs their Other Support document, it needs to be flattened as a PDF prior to submission, and the University must maintain the original signed copy and make it available upon request to NIH. What does it mean to "flatten" a PDF? Where should the version of the document with the original electronic signature be stored?

Flattening means that all embedded electronic information is removed. This can be accomplished by selecting "Print to Adobe PDF" or using a snipping tool to take a screenshot that can be converted to a PDF. You will know that the document has been flattened if, when the cursor moves over the signature block, you are not able to click into the metadata. Both the original version and the flattened version will be stored in GMAS.

Will the Harvard submitting office (OSP/ORA/SPA) require the reporting individual's e-signature prior to reviewing the Other Support document? Or should the reporting individual wait until the submitting office has reviewed their Other Support before they sign it?

The reporting individual submitting Other Support should sign the document just prior to submission to NIH, after it has been reviewed by their department staff and central submitting office in case revisions need to be made.

When Harvard is the Prime institution, how should we advise the subrecipient institutions on which version to send us? Are there differences when Harvard is the subrecipient institution?

Subrecipient institutions should submit signed, "flattened" Other Support PDFs to the prime institution for submission, not "locked" or "secured" versions, as they will not be able to be flattened and uploaded to NIH systems. When Harvard is the subrecipient institution, the appropriate Harvard personnel should send the signed, flattened version to the prime institution, and save a copy of the "certified" (pre-flattened) signed version in GMAS for our institutional records.

NOTIFICATION OF UNDISCLOSED SUPPORT

NIH requires that recipients must notify them immediately upon discovery of undisclosed Other Support.

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Per NIH [NOT-OD-21-073](#): "*When a recipient organization 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, the recipient must submit updated Other Support to the Grants Management Specialist named in the Notice of Award as soon as it becomes known.*"

How will Harvard meet the immediacy requirement?

The individual disclosing or discovering the previously undisclosed support must notify their contact in their sponsored submitting office (OSP, ORA, or SPA) immediately. Once the submitting office reviews the information and determines the relevancy for a disclosure, an Authorized Organization Representative (AOR) from the submitting office must report it to NIH. Per the NIH FAQs, it is expected that the AOR will report failures to disclose within no later than 30 days after the previously undisclosed support becomes known, in line with NIH's requirement for prior approvals (outlined in section 8.1.3 of the NIH GPS).

Does the requirement to immediately notify NIH of undisclosed support apply only to current sources of support, or do completed sources of support also need to be disclosed?

Both. It applies to any undisclosed activity or resource that overlapped with any active NIH award's period of performance.

If I or my lab acquire a new reportable resource after I've submitted my Other Support information at JIT/RPPR, do I need to resubmit updated Other Support immediately, or can I wait until my next JIT/RPPR is due?

If the change is the addition of a *new* source of other support, it can be reported at the next RPPR or JIT. If, however, there is a disclosure of support that was already in place, and which was omitted from previously submitted Other Support, it needs to be reported to NIH immediately.

As a Grants Manager, my PI told me to add something to their Other Support. I'm not sure if the item is new, or if it's older and wasn't disclosed on previous Other Support submissions. Should I ask them?

Yes. If it's not clear whether the item your PI is asking you to add to their Other Support is new, or whether it's an existing source of support that was not previously disclosed to NIH, ask your PI for more information, including the dates of the support. If the item is determined to be previously undisclosed Other Support, notify your central office immediately so they can report it within 30 days of the discovery.

HARVARD TRAINING & RESOURCES

Training

Is there training available for reporting individuals?

Yes, there is a 30-minute online Informational Module from the Harvard Training Portal at the following link: [Disclosing Other Support Guidance – Info Training Module](#). Though reporting individuals are the target audience

for this Informational Module all individuals supporting them in preparing their Other Support, such as Grant Managers, are encouraged to complete the module.

Are reporting individuals required to complete Harvard's Informational Module on Other Support?

All reporting individuals, which includes anyone listed as a PI or Key Personnel on an active or pending NIH or NSF award at Harvard is required to complete the module in advance of submitting Other Support/ Current and Pending Support information.

Harvard systems reports: sponsored & outside activities

As a Grants Manager supporting reporting individuals in completing their Other Support, what information do I have direct access to, and where can I find it?

Grants Managers (GMs) should have access to the reporting individual's active and pending sponsored projects submitted by or awarded to Harvard, as these projects should be in GMAS. GMs can also access project information using the "Active and Pending Projects" (formerly "Current and Pending Support") report located in the reporting individual's Person Profile in GMAS. This report includes data such as PI name, project/subproject title, major goals (project summary), status (active/pending), award number, source of support (sponsor), project start and end dates, and total award amount. Additional information can be found in the project segment within GMAS. See also the GMAS Active and Pending Projects job aid: https://gmas.fss.harvard.edu/files/gmas/files/gmas_job_aid_active_and_pending_download.pdf.

Will the new Harvard Other Support and Activities report that reporting individuals can download from GMAS include all the information needed for their Other Support document?

No. The Other Support and Activities report includes active and pending sponsored projects from GMAS, selected outside activities from OAIR, and data use agreements from the DUA system. The report will not include in-kind resources or activities and relationships that may need to be reported on the individual's Other Support or Biosketch, nor will it include all required information for each type of support or appointment. The reporting individual will need to provide that information directly.

Can reporting individuals delegate access to their grants managers to download the Other Support and Activities report in GMAS?

No, only the reporting individual will have access to download their own report in GMAS, and they cannot delegate access to their grant managers, faculty assistants, or lab staff. However, reporting individuals can opt to download the report themselves and send the report to their grants managers for purposes of assisting with the review and completion of their Other Support form. Reporting individuals will need to provide all relevant disclosure information required for Other Support to their administrators, as the GMAS report will not include all required information.

Do all items that are listed in a reporting individual's Other Support and Activities report in GMAS need to

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be included on their Other Support?

Not necessarily. The reporting individual will need to determine which items on the report are required to be disclosed as Other Support. Also note, the report will contain only currently active items; the reporting individual needs to provide any pending sources of support to their grants manager or add the information to their other support directly.

How will outside (non-Harvard) activities or other items not contained in Harvard systems, but which need to be listed on the Other Support, be reviewed and verified during the proposal process?

The reporting individual is required to accurately disclose all support for their research endeavors, including activities, relationships, and resources outside of Harvard or Harvard's systems. In addition to Harvard establishing a process for reviewing all outside foreign agreements that may need to be attached as supporting documentation, the NIH requires that the reporting individual sign their Other Support document attesting that the information provided is true, complete, and accurate.

Contacts & additional Harvard resources

Where can the Harvard community find more information on Other Support requirements and who to contact for help answering specific Other Support questions not addressed in the NIH FAQs or Harvard's FAQs?

Contact the AOR who reviews Other Support in your school's central submitting office (OSP, HMS ORA or SPH SPA). If you don't know who your central office reviewer is, or you are seeking additional information on reporting requirements, check the OVPR website at https://research.harvard.edu/research-policies-compliance/faculty-disclosure/#:~:text=Federal%20Funding%20Agencies,-National%20Institutes%20of

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