

**Harvard Pilgrim Health Care, Inc.  
Harvard Pilgrim Health Care Institute, LLC  
*Office of Sponsored Programs***

**Policy and Procedure**

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**TITLE: NIH Other Support**

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**PURPOSE:**

To aid Principal Investigators, researchers, and staff determine what information should be included in their other support documentation.

**PERSONS AFFECTED:**

This policy & procedure (P/P) applies to all Harvard Pilgrim Health Care, Inc. (HPHC) and Harvard Pilgrim Care Institute, LLC (HPHCI) (collectively, HPHC/I) personnel engaged in research, teaching, or research administration activities in support of the charitable and educational mission of HPHC, Inc.

**POLICY:**

HPHC/I follows the NIH policy issued via NOT-OD-19-114 in 2019, as amended, and related FAQs and subsequent guidance and clarifications. Please note, this guidance is based on NIH policy as currently understood by HPHC/I's Office of Sponsored Programs (OSP) and is subject to change as additional clarifications are received from NIH or HPHC/I.

Other support is required for:

- All individuals designated in an application as senior/key personnel, *except Program Directors, training faculty, and other individuals involved in the oversight of training grants*
- 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*

**Other support includes all financial and NON-financial resources, whether Federal, non-Federal, domestic, foreign, commercial, or institutional, available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts, or institutional awards regardless of whether they are based at the institution the researcher identifies for the current grant. Endowed Chair funds that support research for investigators other than the actual recipient must be identified.**

- Resources and/or financial support from all foreign and domestic entities, that are available to the researcher. This includes but is 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.).
- Institutional resources, such as core facilities or shared equipment that are made broadly available, should not be included in Other Support, but rather listed under Facilities and Other Resources.
- Consulting agreements, when the PD/PI or other senior/key personnel will be conducting research as part of the consulting activities. Non-research consulting activities are not Other Support.
- In-kind contributions, e.g. office/laboratory space, equipment, supplies, or employees or students supported by an outside source. If the time commitment or dollar value of the in-kind contribution is not readily ascertainable, the recipient must provide reasonable estimates.

#### **PROCEDURE:**

Individual agencies may have more specific policies regarding Other Support. OSP recommends reviewing agency-specific guidelines prior to submissions.

Per NOT-OD-19-114, NIH instructs researchers to list the “total award amount for the entire award period covered (including facilities and administrative costs).” Provide the total costs (direct costs plus indirect costs) for the entire competing period on Other Support pages, regardless of the award’s current project year or budget period or how much of the total funding remains. **Note:** OSP recommends that annual direct costs be listed in addition to total costs for the competing period.

- For other support provided under a consortium/contractual arrangement (subaward), or that is part of a multi-project award, indicate the project number, PD/PI, and source for the overall project, and provide all other information for the subproject only.

- As PI of a multi-project award to HPHC, list the total award amount. You may also add a line that identifies the portion of the budget that supports your own work on the project.

The table below identifies types of resources required to be reported on other support pages. Please note that all new or updated other support, including but not limited to JIT and RPPRs, must be reviewed and authorized by OSP prior to submission to NIH. This applies whether HPHC/I is the prime recipient or a subrecipient.

<b>Roles Required to Submit OS</b>	
<ul style="list-style-type: none"> <li>• PI</li> <li>• Senior/Key Personnel including Other Significant Contributors</li> </ul>	
<b>Roles and Resources Excluded from OS Reporting</b>	
<ul style="list-style-type: none"> <li>• Program Directors</li> <li>• Training faculty, and other individuals involved in the oversight of training grants</li> <li>• Consultants</li> <li>• Serving on a science advisory board for a start-up company where the investigator will not perform research.</li> <li>• Outside activities that are not research related</li> <li>• Start up funds paid by the home institution.</li> </ul>	
<b>External Resources That Must be Reported</b>	
<ul style="list-style-type: none"> <li>• Grants</li> <li>• Contracts</li> <li>• Cooperative agreements</li> <li>• External Consulting</li> </ul>	<p>All active and pending projects that are externally funded (domestic or foreign), regardless of whether HPHC/I is the prime recipient or a subrecipient.</p> <p>Consulting that involves research activities and falls <i>outside</i> of HPHCI appointment, separate from HPHCI agreement.</p> <p>Note: the effort (in calendar months) devoted to each <b>research</b> project must be included, even if there is</p>

	no salary support or direct personal payments to the scientist.
<ul style="list-style-type: none"> <li>• Start-up funds</li> </ul>	If paid by an external organization
<ul style="list-style-type: none"> <li>• Positions, Appointments, and Affiliations.</li> </ul>	Any position or scientific appointment held by investigators that is relevant to the application must be disclosed-including domestic or foreign, paid or unpaid, or full/part-time/voluntary. Titled academic, professional, or institutional appointments, including adjunct, visiting, or honorary must be disclosed.
<b>Internal Resources</b>	
<ul style="list-style-type: none"> <li>• All active and pending internal/institutional (HPHC/I) research awards</li> </ul>	Faculty grants Pyle and Ebert awards Fellowships Endowed Chair funds that support research, whether or not the researcher is the awardee of the funds.  Note: the effort (in calendar months) devoted to each <b>research</b> project must be included, even if there is no salary support or direct personal payments to the scientist.
<ul style="list-style-type: none"> <li>• When used to support a specific research project</li> </ul>	Discretionary General purpose  Note: the effort (in calendar months) devoted to each <b>research</b> project must be included, even if there is no salary support or direct personal payments to the scientist.
<b>Other Resources</b>	
<ul style="list-style-type: none"> <li>• All resources (foreign and domestic) made available in support of and/or related to all 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.</li> <li>• Include the source, a summary of the in-kind contribution, and the</li> </ul>	Materials received from collaborators Discretionary accounts General purpose accounts

<p>estimated value. Only resources uniquely available to the researcher must be reported contribution, and the estimated value.</p> <ul style="list-style-type: none"> <li>An item or service given with the expectation of an associated time commitment is not a gift and is instead an in-kind contribution.</li> </ul>	
<ul style="list-style-type: none"> <li>In-kind contribution, such as technology, chemicals, etc.</li> </ul>	<p>If intended for use on the project being proposed to NIH in the application, the information must be included as part of the Facilities and Other Resources or Equipment section of the application and does not need to be replicated on Other Support</p>

Effective January 25, 2022 (NOT-OD-21-073) NIH requires the following:

- Supporting documentation, which includes copies of contracts/agreements specific to senior/key-personnel foreign appointments or employment with a foreign institution for all foreign activities and resources that are reported in Other Support. If the contracts/agreements are not in English, recipients must provide translated copies.
- Immediate notification of undisclosed Other Support. 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.

<b>Department:</b> OSP	<b>Title:</b> P & P Other Support
<b>Effective Date:</b> 6/1/2021	<b>Owner:</b> Dir, Office of Sponsored Programs
<b>Reviewed By/On:</b> 3/2021	
<b>Replaces P/P Dated:</b>	
<b>Related Documents:</b> NOT-OD-19-114; NOT-OD-21-073	
<b>Approved By:</b> HPHCI Compliance Committee 3/11/2021	