

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

## **Policy and Procedure**

## **TITLE: NIH Other Support**

#### **PURPOSE:**

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

#### 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, 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 and Endowed Chair funds that support research to all of their research endeavors. This includes but is not limited to:

- Resources and/or financial support from all foreign and domestic entities, that are available to the researcher, including financial support for laboratory personnel, and provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.). *Training awards, prizes, or gifts from domestic institutions do not need to be included.*
- 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. *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.*

#### **PROCEDURE:**

The tables below identify 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.

Type of Resource	Notes
Sponsored awards (Grants, contracts, cooperative agreements, OTAs)	Include all active and pending projects that are externally funded (domestic or foreign), regardless of whether HPHC/I is the prime or a subcontract.
Internal Sources of Funding for Research	Include all active and pending internal/institutional (HPHC/I) research awards e.g., faculty grants, Pyle and Ebert awards, fellowships, discretionary, general purpose, Endowed Chair funds that support

	research, whether or not the researcher is the awardee of the funds.
Other Resources	Include 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.

Note: the effort (in number of calendar months) devoted to each RESEARCH project, even if there is no salary support or direct personal payments to the scientist.

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.

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

- 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.

Effective May 25, 2021, (NOT-OD-21-073) NIH requires the following:

- Supporting documentation, which includes copies of contracts/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. 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.

Department: OSP	Title: P & P Other Support	
Effective Date: 3/1/2021	Owner: Dir, Office of Sponsored Programs	
Reviewed By/On:		
Replaces P/P Dated:		
Related Documents:		
<b>Approved By</b> : HPHCI Compliance Committee 3/11/2021		