

Updated NIH Policy Statement Emphasizes “Other Support” Reporting

All faculty who serve as the Principal Investigator or one of the key personnel on an NIH award or pending proposal are required to review this guidance and address the two parts below, as appropriate, by **January 20, 2020**:

Part 1: Amend, as necessary, their “Other Support” documents for submission to the National Institutes of Health, and

Part 2: Update, as necessary, their outside interests through the University of Michigan’s Conflict of Interest disclosure system, [M-Inform](#).

Researchers who receive any federal funding are advised that the Office of Research and Sponsored Projects’ policy [200.03](#) implemented in October 2016 requires:

*“every disclosure to an external funding agency of a faculty member’s active and pending sources of support for research and other sponsored activities be true, complete and accurate to the best of the faculty member’s knowledge. This requirement applies regardless of the source of support, the official recipient of the source of support, **False, fictitious, or fraudulent statements or claims (including intentional omissions) in violation of this policy may result in criminal, civil, administrative or University penalties.**”*

See “Other Support, Emphasized” for guidance on what constitutes “Other Support,” and see “How to Comply” for guidance on the actions all U-M faculty who receive NIH research funding must take by **January 20, 2020**.

Other Support, Emphasized

NIH recently released an update to the [NIH Grants Policy Statement](#), retroactive to October 1, 2019, that **emphasizes “Other Support” reporting requirements**.

[NIH stated that resources requiring disclosure as “Other Support” include:](#)

*“**all resources** made available to researcher[s] or senior key personnel 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. Other support does not include training awards, prizes, gifts or startup support from the U.S. based institution [e.g. internal U-M startup support, lab space or training funds do not require disclosure].”*

NIH requires disclosure of every research-related grant, contract, cooperative agreement, salary, stipend, laboratory equipment, research material, position, appointment, postdoc, and other financial and non-financial resource to which a faculty member may have direct or indirect access.

In order to comply with NIH policy, please adhere to the following key concepts when submitting “Other Support” information (e.g., in Just-In-Time materials, Research Performance Progress Reports, etc.):

1. “Other Support” encompasses *all* of the resources that you have access to – not just the grants and contracts that support your research.
2. “Other Support” includes resources that do NOT have a dollar value attached to them (AKA “in-kind”), as well as resources that do have monetary value.
3. “Other Support” includes resources that are at all potentially *related* to your research, in addition to the resources that directly support your research.
4. “Other Support” includes resources available to you at other institutions beyond U-M, and in other countries outside the U.S.

NIH provided some examples of “Other Support” that can help guide your thinking.¹ These examples include:

- Participation in any manner and at any level in a foreign government talent recruitment program (e.g., China’s Thousand Talents Program) or similar type of program.
- Participation in a grant or contract issued by a foreign government to a foreign entity.
- Provision of high-value materials (e.g., biologics, chemicals, model systems, technology, etc.) and in-kind services and resources (e.g., office/laboratory space, equipment, employees) that are made available to you by a non-U-M source (including domestic and foreign universities, individuals, and companies), but are not freely available to others.
- Positions, affiliations or appointments with any entity other than U-M, including affiliations with foreign entities or governments.
- Titled academic, professional, or institutional appointments outside of U-M, *regardless of whether remuneration is received* (full-time, part-time, or voluntary, including adjunct, visiting, or honorary).
- Financial support for laboratory personnel, including Postdoctoral Fellows

How to Comply

Part 1: “Other Support”

To submit updated “Other Support” to NIH, complete the appropriate form below and email it to Other-Support-Reporting@umich.edu with your NIH award number in the Subject line by **January 20, 2020**.

- [Other Support form for New and Renewal Applications](#)

¹ Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components. Notice Number NOT-OD-19-114. Release Date: July 10, 2019. <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html>

- [Other Support form for updating active grants](#) [Other Support](#)

PART 2: Outside Interests

Per [U-M Policy](#), if a source of “Other Support” qualifies as an Outside Interest, it must also be disclosed in [M-Inform](#). Outside Interests consist of, among other things, (1) *Paid or unpaid* activities for, and relationships with, an outside organization for which the individual utilizes the same skills and knowledge as for his or her institutional responsibilities; (2) Ownership in a company or business; (3) Compensation, loans, other payment(s), or items of value received from an outside organization; and (4) Travel expenses that are reimbursed to an individual or paid directly by an outside organization.

To newly disclose an outside interest, or to update a previously disclosed outside interest, log in to [M-Inform](#) and follow the [online instructions](#) by **January 20, 2020**.

For Questions

For questions and further assistance, please email InternationalResearchGuidance@umich.edu or contact Craig Reynolds, Executive Director of the Office of Research and Sponsored Projects, at 734-647-9887 or creyno@umich.edu.

The Office of the Vice President for Research also created a [web portal](#) that features information and resources to promote successful collaborations between U-M researchers and international partners.