**Other Support and Foreign Component**

The purpose of this document is to help guide internal BMC staff understand what must be reported as **“Other Support”** and **“Foreign Component”** to NIH in grant applications and reporting under the NIH Grants Policy Statement and [NOT-OD-19-114](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html). This document is organized in three parts: (Part 1) Defining Other Support and explaining what needs to be reported, where, and when; (Part 2) Defining Foreign Component, outlining the *Two-Step Analysis* to determine inclusion, and explaining what needs to be reported and when; (Part 3) Presenting case studies and providing answers with discussion.

*NIH’s purpose*: National Health Institute: NIH released a series of documents including the notice, NOT-0D-19-114, addressing disclosures of “foreign components” and “other support”, as well as affiliations in grant applications and reports. There is also a changing electronic [NIH FAQ document](https://grants.nih.gov/grants/faq-other-support-foreign-components.htm) tied to the notice about foreign components and other support. NIH is interested in complete and accurate reporting of research support from both internal and external sources to assess scientific and budgetary overlap, and availability of time to commit to NIH funded projects.

1. **Other Support**
2. **Definition:** 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 and regardless of whether they are based at the institution the researcher identifies for the current grant. (NOT-OD-19-114)

1. **What Needs To Be Reported:**
2. **Affiliations and Appointments:** Key personnel must disclose all positions and scientific appointments both domestic and foreign that are relevant to an application.
	1. Examples: Affiliations with foreign entities or governments, titled academic, professional, or institutional appointments, whether paid or unpaid and whether full-time, part-time, voluntary, visiting, adjunct, or honorary.
	2. Changed from GPS Original Understanding: This information must now be reported as OS although it was originally in the biosketch.
3. **Outside Professional Activities:** Report all current projects and activities that involve senior/key personnel, whether paid or unpaid, whether domestic or foreign, whether it takes place at the researchers’ institution or outside.
	1. Examples: Including but not limited to research grants, cooperative agreements, contracts, institutional awards, in-kind support described below in Section B(3).
	2. Consulting Excluded: COGR suggests that consulting originally appeared in the NIH FAQs as something that needs to be disclosed, but after discussion, this has been excluded as an OS disclosure, noting it should be disclosed in the COI process.
	3. Where to Report: COGR advises support may be reported in Facilities and Other Resources OR Other Support sections
4. **Paid or Unpaid Support:** Report all resources made available to senior/key personnel – including program director/principal investigator and for other individuals who contribute to the scientific development or execution of a project in a “substantive, measurable way, whether paid or unpaid.
	1. Examples: Required reporting all types of support for those projects and activities, for example, office/laboratory space, equipment, supplies, employees, visiting researchers/scientists, whether paid internally or externally, foreign financial support, research or laboratory personnel, lab space, scientific materials, selection to a foreign “talents” or similar program, or other foreign or domestic support.
	2. Broad reach: Information must be provided whether it is in support of the applied for project or for any other ongoing projects and activities and whether it is provided through an institution or to the individual themselves.
	3. Where to Report: COGR advises support may be reported in Facilities and Other Resources OR Other Support sections. Anyone, including visitors, dedicating at least one month of effort to the project in the budget year, whether the effort is compensated or not, must report details in the annual report or RPPR per NIH policy.
5. **Training Awards, Gifts and Prizes / Institutional Support:** The NIH Grants Policy Statement (“GPS”) Section 2.5.1specifically precludes training awards, prizes, or gifts from needing to be reported as OS. However, NOT-OD-19-114’s clarification that is not meant to supersede GPS states all resources and support and current projects and activities should be reported, without the carveout provided in GPS (see Sections B(2)-(3) above).
	1. Guidance: COGR suggests that some funding support might often be incorrectly categorized as a gift, and that institutions should review their policies and procedures for determining to ensure proper classification. Sometimes institutions may choose to use funds originally received as a gift in different ways that support research such as seed research funding or general support for investigator research. Since NIH does not have guidance in this case, COGR suggests institutions decide reporting policies in these cases, keeping in mind NIH’s goal of full assessment of scientific, budgetary, or commitment overlap.
	2. Where to Report: If the institution determines the gift should be classified as a reportable source of support under the GPS and NOT-OD-19-114, then it should be listed in the Other Support section with appropriate details.
6. **When To Report:** Must be reported at Just-in-Time and up to the time of award. If other support is obtained after the award period, it must be disclosed in the annual research performance progress report (RPPR). Information must be provided for *all current support for ongoing projects*, not just projects starting now and in the future (NOT-OD-19-114, Other Support, Section 2).
7. **Foreign Component**
8. **Definition:** The NIH Grants Policy Statement, Section 1.2, defines “foreign component” as: “[T]he performance of any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, whether or not grant funds are expended.” The NIH Notice emphasizes the words “significant scientific element or segment of a project outside of the United States”. Therefore, NIH indicates a ***two-step analysis*** for foreign components:
9. First, is a portion of the NIH project performed outside of the U.S.?
10. Second, determine if those activities are significant?
	* Activities that could be considered a significant element of the NIH project include:
		+ Collaborations with investigators at a foreign site anticipated to result in co-authorship.
		+ Use of facilities, materials, staff, or resources at a foreign site
		+ Receipt of financial support or resources from a foreign entity
* **When To Report:** Foreign Component must be reported in the grant application, and the awardee institution must obtain prior approval for foreign components arising during the performance of the grant project. (GPS Section 8.1.2.10). For more information on where and when to report, please visit the [Research Operations Website](https://www.bmc.org/research-operations) to find posted additional resources.