Frequently Asked Questions (FAQs)

**Other Support and Foreign Components**

[. Other Support](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=alphaHeader4226)

[Expand/Collapse Headers]

[A. General](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=header11776)

[Expand/Collapse Questions]

[1. Has NIH expanded the applicability of the Other Support policy? UPDATED](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56185)

No. [NOT-OD-19-114](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html) is a reminder for the extramural community of NIH’s Other Support policy, and its applicability. [NOT-OD-21-073](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-21-073.html) updates the Other Support form and instructions to support the need for applicants and recipients to provide full transparency and disclosure of all research activities, foreign and domestic.

[2. What is the effective date of the new Other Support format page? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56186)

As outlined in [NOT-OD-21-073](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-21-073.html), the updated Other Support format page must be used for Other Support information submitted on or after May 25, 2021. When Other Support information is requested at time of application, the updated format must be used for due dates on or after May 25, 2021 (including applications submitted early for those due dates).

[3. If I submitted my Just-In-Time, including Other Support, prior to May 25, 2021, but my award has not issued, do I need to re-submit on the updated form? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56187)

[4. If an institution identifies a resource that was not reported in Just-in-Time or at the time of the RPPR, how should the institution notify NIH? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56188)

If an 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 institution must submit updated Other Support to the Grants Management Specialist named in the Notice of Award as soon as it becomes known.

[5. Do the updates to the Other Support impact the timing of submission (e.g. Just-In-Time, RPPR)? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56189)

No. The updates to Other Support are to the form and instructions and do not change the process or timing of submission.

[6. Do researchers report gifts in Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56190)

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

[7. Should the dollar amounts reflected on the Other Support document reflect annual total cost or annual direct cost only? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56191)

Other Support submissions should provide the total award amount, direct and indirect, for the entire project period (e.g. competitive segment for NIH grants), not just the annual budget period.

[8. Do the 2021 changes to the Other Support Format page affect the instructions for Other Support in the Research Performance Progress Report (RPPR)? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56199)

No. While the format has changed, NIH will still require recipients to report significant changes in Other Support for all existing senior/key personnel, and Other Support information for any new senior/key personnel being requested.

[9. Does NOT-OD-21-073 impact Data Tables, which include reports of research support for faculty associated with Institutional Research Training grant applications? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56200)

No, there are no changes to what should be reported on data tables for Institutional Research Training grants. Comprehensive information related to these data tables can be found on [NIH’s Webpage on Data Tables](https://grants.nih.gov/grants/forms-f/data-tables.htm).

[10. On Mentored Career Awards, mentors/co-mentors are required to submit Current and Pending Support in competing applications. NOT-OD-21-073 indicates that other support must include signatures. Do mentors need to sign the form when reporting current and pending support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56202)

Yes. Attachments should be submitted as a flattened PDF, after all signatures are obtained. Applicants and recipients must maintain the original electronic signature and make it available upon request.

[11. On Mentored Career Awards, mentors/co-mentors are required to submit Current and Pending Support in competing applications. NOT-OD-21-073 indicates that other support should now include total costs, rather than annual direct costs, in other support reporting. Are mentors/co-mentors now required to report on total costs when reporting current and pending support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56201)

Yes, mentors/co-mentors on mentored career development awards must include total costs, rather than annual direct costs, when reporting current and pending support within applications.

[12. Will NIH begin using SciENcv for Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56203)

NIH and SciENcv are currently developing an Other Support template, the estimated date to be rolled out, at the earliest, is Fiscal Year 2022.

[13. Is the researcher’s signature now required on Other Support submissions? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56204)

Yes. All principal investigators and other senior/key personnel must electronically sign the Other Support form, prior to its submission to NIH, certifying that the information is accurate and complete.

[14. NIH does not allow electronic signatures on attachments in electronic application attachments. Will electronic signatures be accepted on Other Support submissions? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56205)

Other Support submissions at Just-in-Time and in the RPPR must be submitted as a flattened PDF, after all signatures are obtained. Applicants and recipients must maintain the original electronic signature and make it available upon request. When NIH transitions to the use of SciENcv to generate Other Support, the signature/certification will be integrated into that process.

[15. Do outside consulting activities have to be reported in Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56192)

Consulting or professional service arrangements that do not involve research do not need to be reported, as the type of work conducted is not typically considered to be a resource available in support of an individual’s research endeavors. When the researcher will be conducting research as part of the consulting activities, they must report it as Other Support.

[16. Should a researcher include start-up support provided by the applicant organization in Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56193)

Start-up packages provided to the researcher from the applicant organization are not included in Other Support. Start-up packages from outside organizations, including foreign entities, must be included in Other Support

[17. When a researcher is including information on a subproject in Other Support, should the researcher provide the total award amount for the overall award, or only the subproject? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56194)

For subprojects, recipients should provide the project number and PD/PI name for the overall project. All other information, including total award amount and person months, for the subproject only.

[18. When a researcher works on a subaward to an NIH grant that is awarded to another institution, how should that information be included in Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56195)

The researcher should provide the project number, PD/PI name for the prime award. All other information, including the total award amount and person months, should be specific the subaward.

[19. If a PD/PI or other senior/key Personnel has an exchange student or post-doc working on research activities in their lab who is paid a salary by their home university in a foreign country, does that need to be included in Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56196)

Yes, since the student or post-doc is performing research activities, the student’s work in the lab is a resource available in support of the PD/PI or other senior/key Personnel’s research endeavors. It must be reported as an in-kind contribution on Other Support.

[20. If a PD/PI or other senior/key personnel is mentoring post-doc or graduate students who are individually funded through an outside institution) e.g. foundation or home university), does that need to be disclosed as an in-kind resource in Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56197)

If the post-doc or graduate student is performing research activities in support of the PD/PI or other senior/key personnel’s research endeavors, then their support must be reported as an in-kind resource. If the relationship is solely a mentor/mentee arrangement, with no research activities, then it

[21. Do core facilities or shared equipment need to be included in Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56198)

No. Other Support includes resources uniquely available to the researcher and does not include institutional resources that are made broadly available to faculty and staff.

[22. Do facilities and administrative (F&A) funds provided to an institution constitute research support that must be included in Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56206)

No. F&A reimbursement is not considered a resource available in support of an individual’s research endeavors and should not be included in Other Support. See NIH Grants Policy Statement, [Section 7.4](https://grants.nih.gov/grants/policy/nihgps/HTML5/section_7/7.4_reimbursement_of_facilities_and_administrative_costs.htm), for detail on F&A costs.

[23. When providing the total award amount for an NIH funded grant project, should the researcher provide what was requested in the initial application, or the amount of funding listed on the current Notice of Award? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56207)

Researcher’s should list the total award amount, direct and indirect, for the entire project period, based on the most recent Notice of Award specific to that project.

[24. Does private equity financing need to be reported in Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56208)

Yes. Private equity financing (most commonly seen in the NIH SBIR/STTR program) is a resource available in support of an individual’s research endeavors and must be included.

[25. What does NIH evaluate when reviewing Other Support submissions? UPDATED](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56209)

NIH scientific program and grants management staff review Other Support information to ensure that:

* All resources, domestic or foreign, directly supporting the individual’s research endeavors have been reported
* Sufficient levels of effort are committed to the project
* There is no scientific, budgetary, or commitment overlap
* Only funds necessary to the approved project are included in the award
* Any foreign resources that meet the definition of a foreign component have received appropriate prior approval.

[26. I am a Principal Investigator on an NIH award to a domestic university and have an unpaid appointment at a foreign university. At the foreign site I have access to lab space, research materials, and staff. Should I report this as Other Support?](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56210)

Yes. While the researcher is not receiving monetary compensation, the lab space, materials, and staff are resources made available to them in support of and/or related to their research efforts. Other payments, such as travel or living expenses must also be reported. As outlined in [NOT-OD-19-114](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html) this appointment must be reported as Other Support. NIH requires applicants to list all positions and scientific appointments both domestic and foreign held by senior/key personnel that are relevant to an application including affiliations with foreign entities or governments. This includes titled academic, professional, or institutional appointments whether or not remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary).

[27. I am key personnel on an NIH grant in the United States. I am collaborating with another scientist in the US, whose experiments have directly benefitted my research. Their experiments were conducted with funds awarded to their institution. Should this be reported as Other Support?](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56211)

Yes. Other Support includes domestic research collaborations that directly benefit the researcher’s research endeavors.

[28. A researcher at my institution has a 9-month appointment. They spend two months at a University outside of the United States during the summer conducting research under a foreign award. Does this count as Other Support?](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56212)

Yes. Available resources in support of and/or related to an investigator’s research endeavors should be disclosed even if they relate to work that is performed outside of a researcher’s appointment period.

[29. What if NIH determines that an institution is not complying with NIH policies for transparency and disclosure of all Other Support?](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56213)

NIH takes the issue of protecting the integrity of U.S. biomedical research seriously. When issues of noncompliance are identified, NIH will take action as outlined in the NIH Grants Policy Statement, [Section 8.5](https://grants.nih.gov/grants/policy/nihgps/html5/section_8/8.5_special_award_conditions_and_remedies_for_noncompliance__special_award_conditions_and_enforcement_actions_.htm). This may include withdrawing approval of the Program Director/Principal Investigator or other researchers contributing to the NIH award, imposing specific award conditions, disallowing costs, withholding future awards including the possibility of suspending or terminating the award.

[30. What should I do if I’m not sure if something needs to be included as Other Support?](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56214)

In the interest of full transparency, recipients should err on the side of disclosure. Researchers should consult with their institutional officials for guidance to ensure compliance with institutional and NIH policies. NIH requires complete and accurate reporting of all sources of research support, financial interests and affiliations, both foreign and domestic.

[B. In-Kind Contributions](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=header11777)

[Expand/Collapse Questions]

[1. Do in-kind contributions that will be used for the project being proposed need to be included in Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56215)

If an in-kind contribution, such as technology, chemicals, etc. is 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.

[2. If an in-kind contribution is listed in Facilities and Other Resources or Equipment, does it also need to be included in both Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56216)

If an in-kind contribution is not intended for use on the project being proposed, then the information must be included as part of Other Support. If the in-kind contribution is intended for use on the project being proposed, then 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.

[3. For in-kind resources that do not have any associated effort, can researchers enter zero effort? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56217)

Yes, for in-kind resources with no associated time commitment, researchers can list zero effort, but must provide the estimated dollar value of the in-kind resource. The effort and dollar value cannot be both be zero.

[4. How should researchers list materials (e.g., data, samples, etc.) received from external collaborators on Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56218)

Information on materials received from collaborators must be included in the in-kind contribution section of Other Support, including the source, a summary of the in-kind contribution, and the estimated value. Only resources uniquely available to the researcher must be reported.

[C. Foreign Contracts](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=header11778)

[Expand/Collapse Questions]

[1. What types of foreign contracts are applicants and recipients required to submit with Other Support? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56219)

NIH requires researchers to provide foreign contracts, grants or any other agreements specific to senior/key-personnel foreign appointments, affiliations, and/or employment with a foreign institution. Copies must be provided as part of the PDF following the Other Support format page.

[2. Does this include employment contracts for fellows or students working in the lab? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56220)

No. Personal service contracts for lab staff do not need to be provided. Only contracts, grants and any other agreements specific to the PD/PI or other senior/key personnel’s appointments and employment are required. However, NIH continues to reserve the right to request additional information, as necessary.

[3. For ongoing NIH grants, do recipient institutions need to provide copies of translated foreign contracts for any current foreign appointments and/or employment with a foreign institution? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56221)

Yes. The requirement to provide foreign contracts, grants or any other agreements applies to all Other Support information submitted on or after May 25, 2021. In the Research Performance Progress Report (RPPR) for ongoing grants, recipients must provide copies of foreign contracts, grants or any 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.

[4. How will NIH review foreign contracts, grants or any other agreements that are provided? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56222)

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. NIH will review contracts, grants or any other agreements to confirm that all information provided in the Other Support submission is accurate and complete.

[5. If the applicant organization is a foreign institution, does the researcher need to provide copies of their contract with the applicant organization? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56223)

No. The researcher’s employment contract with the applicant organization does not need to be provided. Contracts, grants or any other agreements with outside entities, such as other foreign organizations, must be provided.

[6. Are machine-read translations of foreign contracts, grants or any other agreements acceptable for Other Support submissions? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56224)

Yes. NIH will accept machine-read translations.

[7. Are the costs of translating foreign contracts allowable on NIH grants as a direct cost? NEW](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56225)

The costs associated with translations of foreign contracts for inclusion in Other Support submissions are not typically allocable to a specific NIH grant project and are therefore not allowable as a direct cost. NIH recommends that institutions consider including such costs in their negotiations for indirect cost reimbursement.

[II. Foreign Components](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=alphaHeader4227)

[Expand/Collapse Questions]

[1. What is the definition of a foreign component, and has it changed?](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56178)

No, NIH has not changed the definition of a foreign component. [NOT-OD-19-114](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html) reminds recipients that a foreign component is the performance of a significant scientific element of the NIH-supported project outside of the United States.  Once a recipient determines that a portion of the project will be conducted outside of the U.S., the recipient then will need to determine if the activities are considered significant. If both criteria are met, then there is a foreign component.

[2. What are some examples of a “significant element of a project” when making determinations regarding a foreign component?](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56179)

The recipient institution should evaluate the element of the project that is being conducted outside of the United States within the context of the project as a whole when making determinations about significance. Some examples of activities that may be considered a significant element of the project include, but are not limited to:

- collaborations with investigators at a foreign site anticipated to result in co-authorship

- use of facilities or instrumentation at a foreign site

- receipt of financial support or resources from a foreign entity

[3. What is the NIH definition of a foreign institution?](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56180)

NIH defines a foreign institution as an organization located in a country other than the United States and its territories that is subject to the laws of that country, regardless of the citizenship of the proposed PD/PI.

[4. Does work being conducted in the United States ever count as a foreign component?](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56181)

Generally, no. The first step in determining if an element or segment of an NIH-funded project constitutes a foreign component is to evaluate whether the work is being conducted in a foreign country. If not, then it is considered other support and must be reported. In all cases, recipients are encouraged to discuss specifics, in advance, with your Grants Management Officer regarding proper classification of Other Support and Foreign Components.

[5. What is an example of an activity that is not a foreign component, but would meet the definition of Other Support? What is the difference?](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56182)

This response is dependent upon specific details that surrounding the activity. For instance, one model could be that a PI on an NIH grant may have an appointment and a lab at a foreign university. The research being done at the foreign lab is unrelated to the PI’s NIH project. This would not qualify as a foreign component of the NIH research, as the foreign work is not part of the NIH-funded project. However, it is a resource made available to the researcher in support of their research. Therefore, it must be reported as Other Support.

[6. I am the PI on a NIH grant to a domestic university. I have a visiting post-doctoral fellow in my lab, who works on my NIH grant and does all of his/her work in the United States. The fellow’s salary is paid by a foreign government. Is this a foreign component?](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56183)

In general, no. The first step in determining whether research constitutes a foreign component is to evaluate whether a portion of the research is being conducted outside of the United States. In this case, all of the work is being conducted in the US, so there is no foreign component.

[7. I am a PI on an NIH award to a domestic university. I will have a visiting fellow joining my lab whose salary will be supported by a foreign university. Do I need NIH prior approval before the fellow can work on my NIH funded research?](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm?anchor=question56184)

Since specific circumstances may vary, it would be best to discuss with your Grants Management Officer.