GCO’s Response to NIH Implementation Plan on Changes in Biosketch and Other Support Pages

Last updated: 5/23/21
NIH Updated Implementation Plan

- The NIH has issued an updated notice (NOT-OD-21-110) announcing a new implementation plan for changes to the Biosketch and Other Support pages.
- The NIH expects applicants to use the updated formats as of May 25, 2021.
- NIH requires the use of the updated formats beginning with due dates on and after January 25, 2022.
- Failure to follow the appropriate formats on or after January 25, 2022 may cause NIH to withdraw applications from or delay consideration of funding.
- Applicants remain responsible for disclosing all research endeavors regardless of the version of the forms used.

If applicants choose not to use the updated formats before they are required, applicants must still capture all the necessary information.
Mount Sinai and all applicant organizations must also …

- If asked by the NIH, provide supporting documentation, which includes copies of contracts, grants or any other agreement 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, grants or other agreements are not in English, recipients must provide translated copies.

- Immediately notify the NIH 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.

More information on the NIH Extramural Nexus blog can be found here.
The GCO submitted a question to the NIH regarding the requirement to list all appointments in the Bioksetch Section B "Positions, Scientific Appointments, and Honors" while maintaining the overall 5 page limit.

This adversely affects our senior faculty who have had long, productive research careers as this section would have consumed the entire biosketch.

The NIH responded to us and the other institutions that raised this issue by updating their biosketch policy.

The NIH writes:
"Investigators must include all active positions and scientific appointments. Positions and appointments that are no longer active are optional, and may be included as appropriate in support of the application."
GCO’s Response to NIH’s Updated Implementation Plan

Biosketch
✓ GCO strongly recommends using the new Biosketch format immediately.
✓ At the minimum, investigators must list all active appointments and employment regardless of relatedness to the project. See preceding slide for complete information.

Other Support
You may continue to use the old format. However, when doing so…
✓ Use Project Period Total Costs rather than Annual Direct Costs for active and pending awards.
✓ Investigators must include an “Other Appointments and Outside Employment” section. If none, state “none” in this section.
  o Describe the nature and duties of any outside appointment and/or employment. If facility use or space is provided, state so and describe.
✓ Investigators must include a “Lab Personnel Paid Directly by Third Party Entities” section. If none, state “none” in this section.
  o List name, title, and outside entity.
✓ Reminder! It has always been required to report all grants from all appointments.
✓ You may wish to review GCO’s samples of this interim version.

GCO will start enforcing the above for all JIT requests and applications with due dates on or after 5/25/2021.
NIH’s Updated Implementation Plan
Other Support Changes: Supporting Documentation Requirement for Foreign Appointments/Employment

If asked by the NIH, applicant institutions may need to provide supporting documentation which includes:

► Copies of contracts, grants or any other agreement 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.

► This is for all foreign activities and resources that are reported on the Other Support.

► If the contracts/agreements are not in English, recipients must provide translated copies.

► Machine read translations are acceptable.

✓ Provide the contract/agreement in the original foreign language.
✓ GCO will obtain the machine read translated contract/agreement.
✓ Documents translated by the Investigator will not be accepted.
NIH’s Updated Implementation Plan
Other Support Changes: Immediate Notification of Undisclosed Other Support

Scenario:
▶ A recipient organization discovers that a PI or other Senior/Key personnel on an active NIH grant failed to disclose Other Support information.

▶ This could occur either after the Just-in-Time or the RPPR application was submitted.

▶ The investigator must submit an updated Other Support to the GCO, for forwarding to the Grants Management Specialist named in the Notice of Award as soon as it becomes known.