Frequently Asked Questions on Changes to the Biosketch, Other Support, and Facilities/Other Resources Pages

The GCO has compiled a list of questions that the research community had asked regarding the changes to the Biosketch and Other Support pages and the GCO responses to them. This information supplements the Biosketch FAQs and Other Support FAQs that are posted on the NIH website. The information is organized in the following sections:

I. Biosketch Page

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III. Facilities & Other Resources and Equipment Pages
I. **Biosketch Page**

Q# 1. Are we still able to list relevant publications in the Biosketch?

Yes, relevant publications are still listed in the Biosketch.

Q# 2. I volunteer as a member of an IACUC at a local community college. Do I need to include this on my Biosketch?

Yes, unpaid professional positions are included in section B entitled “Positions, Scientific Appointments, and Honors.”

Q#3. What is the **maximum number of projects** an investigator can list in Section A, the Personal Statement of the Biosketch?

There is no maximum of research projects you may list in Section A. There’s a 5 page overall limit.

Q#4. I was a physician in the Israeli military a long while ago and held an administrative but not academic position. Do I need to report this on the Biosketch?  

Updated

You may include this position. 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 Positions and appointments that are no longer active are optional, and may be included as appropriate in support of the application.

Q#5. Is it true that on the NIH biosketch I don’t have to list former positions?

That is true. See Q # 4 for more information.

II. **Other Support**

A. **General**

Q# 6. What is **Just in Time**?

This is the process the where the NIH collects documentation that is not included in the application but is required to make an award from the applicant institution. The eRA Commons Just-in-Time link appear on the “Status” screen within 24 hours after the impact score has been released for project within the fundable range. NIH also issues Just-in-Time emails for all applications that receive an overall impact score of 30 or less. Applicants should not submit any Just-in-Time information until a specific request for information is received via email from the system and/or grantor agency.

The Other Support page for each senior/key personnel is one of the required pieces of information in the JIT submission.

Q# 7. What is **overlap**?

Click [here](#) for the NIH definition of scientific, budgetary, and commitment overlap and click [here](#) for Dean’s Office/GCO Guidance on providing.
An example of scientific overlap would when NIH is reviewing a project under consideration for funding and the same project has also been submitted to the American Heart Association.

An example of budgetary overlap would a PI of 2 projects one on heart disease and the other in hypertension. The same clinical lab are used for both projects.

Q# 8. What is a **Primary Site**?

The primary site is the awardee institution. This is the entity that is receiving the funds directly from the NIH.

Q# 9. What is **primary place of performance** on a subaward?

It is a sub awardee rather than the primary site.

Q# 10. Will other **federal agencies** be updating their **Other Support** requirements?

Yes, perhaps not as extensively but all the Federal agencies are required under Federal order. NSF did came out with changes to the Other Support that is more aligned with GCO’s interim format. The NSF is not requiring in kind resources unrelated to the project to be reported on the Other Support page. The NSF is also not requiring signature verification.

Q# 11. Can we assume that all federal agencies will be moving to this same format like the CDC and NIOSH?

Every funding agency is coming out with their own guidance. NIH and NSF for example have different guidance for Other Support pages so we’re not assuming the CDC will use the same format as the NIH.

Q# 12. I am a **recipient of an internal award** for COVID 19 funding. Does that go on my **Other Support** page?

Yes, if you are a recipient of an internal grant competition, include it in the Projects/Proposals section.

Q# 13. Should the **Other Support** page contain **active, pending and completed projects**? **New**

No, the NIH changed the requirements and they do not want completed projects on the Other Support page. Use the Biosketch Section A Personal Statement if you wish to highlight completed projects.

Q# 14. Do I include **Adjunct** and **Voluntary Appointments** on my **Other Support** page?

Yes, include adjunct and voluntary appointments on the OS page.
Q# 15. Does the GCO want the new NIH format or the GCO issued interim format? Will the GCO accept both the interim and the new NIH format?

Yes, GCO will accept both formats.

Q# 16. Why is the NIH interested in reviewing investigators’ foreign contracts and agreements?

Some foreign agreements include clauses such as if there are any inventions created on the projects that he/she is working on, they must be patented in that foreign country rather than in the United States.

Q# 17. How do we explain these changes to our subawards to ensure they are also compliant?

If a subawardee institution also receives direct NIH funding, they should be following their own policies and procedures. Please note that until January 25, 2022 the GCO will accept whatever Other Support format the subawardees submit to us, unless it is missing required sections under the “old” guidelines, and will review for technical errors like the CM being over 12.

Q#18. Do Other Support Pages for Mentored Career Development Awards follow their own set of instructions or do they follow the new format? New

Both. These instructions for Mentored Career Development Awards from the SF 424 Guide still apply:

Include "Current and Pending Support" pages for each of the mentor and co-mentor(s). You do not need to include "Current and Pending Support" pages for the candidate. Each mentor/co-mentor(s)’s “Current & Pending Support” attachment is limited to 3 pages.”

Within these instructions, you can either submit GCO’s Interim Other Support Format Page or the New NIH Other Support Format Page Required On/After Jan 25, 2021. Additional FAQs on Mentored Career Development Awards can be found on the NIH FAQ OS page.

B. In Kind Support
1. General In Kind

Q# 19. What does In Kind mean? Updated

In kind contributions are non-monetary contributions such as office/laboratory space, equipment, supplies, or employees or students supported by an outside source. In kind also includes volunteers.

Below are some examples of in kind support.

- fellow being paid by Canadian Institutes of Health working in the PI’s lab
- donated high value cell lines or custom knock out mice
- lab at another institution PI has access to use
- volunteer in Investigator’s lab paid by an external third party

Q# 20. It is my understanding that I don’t need to report on start up funds. How about seed funding? Updated
Start up funds and seed funds are the same. You don’t need to report on this as long as this funding is from Mount Sinai. However, if you are receiving seed funds from an external source, you do need to report on this.

Q# 21. Is there a timeframe for which In Kind reporting applies? If the PI received $5,000 from a foreign lab for research and has spent it within 2 months, does it need to be reported?

Completed in kind donations are not reported. In the new NIH Other Support format, in kind contributions are for active and pending only and not completed.

Q#22. Do I include other internal non seed funding on my Other Support page?

Do not include internal non seed funding if it is for general expenses. Internal grant competitions are included in the Projects/Proposals rather than the In Kind section.

Q# 23. If I don’t have any In Kind Contributions, what do I list? Updated

On the new NIH OS format, include an In Kind section and type “None.”

On the interim GCO OS format, there is no in kind contributions section.

Q# 24. What does outside source mean in relation to In Kind donations?

That means an activity paid by a third party. An outside source would not be Mount Sinai.

Q #25. Should the return of Indirect Costs back to the department be included in the in kind section?

No, this is not considered an in kind contribution.

2. Consulting (Research)

Q# 26. Regarding research consulting activities that must be disclosed, is this only for the agreements that have been reviewed and approved by Mount Sinai? Do we need to include personal agreements that have not reviewed and approved by Mount Sinai?

All consulting agreements must be vetted at Sinai. Please review Mount Sinai’s consulting policy.

Q# 27. I am earning $10,000 in consulting fees from Cornell to conduct research. Does this go on my Other Support page? And where? Updated

Yes, if you are using the new NIH Other Support format, include in the In Kind section.

If you are using GCO’s interim Other Support format, include in the “Other Appointments and Outside Employment” section.
Q # 28. Can you explain the **difference between research** and **non-research consulting activities**?

Here are some examples. Non-research consulting would be a faculty member’s expert testimony at a trial or consulting to develop a curriculum at a medical school.

Research consulting would be the statistical work on a project. Please keep in mind that Mount Sinai has specific rules about consulting and the use of Mount Sinai resources, which is de minimus use of the library and computer. Please review [Mount Sinai’s consulting policy](#).

Q# 29. How do I list effort on my consulting agreement?

List with a dollar value rather than with effort.

Q #30. How do I list the **value of the consulting agreement** that is a rate based rather than a set amount?

Provide a reasonable estimate of the amount. If, for example, the amount is $100 an hour for up to 50 hours of work, list $5,000.

### Personnel (e.g., Students, Trainees, Volunteers, etc.)

Q# 31. I have research staff partially supported by an Interagency Personnel Agreement (IPA) at the **Bronx VA**. Do I need to disclose this on my Other Support page?

Yes, if you are using the new NIH Other Support format, include in the in kind contributions section.

If you are using the GCO interim Other Support format, include in the “Lab Personnel Paid Directly by Third Party Entities” section.

Q# 32. I am a mentor on a training grant and have a **T32 fellow** working with me on my NIH grant. Do I report this?

Yes, you are reporting in two places.

- **RPPR > Section D.1 > Participants**
  
  Instructions:
  
  Provide or update the information for: ... “(2) each person who has worked at least one person month per year on the project during the reporting period, regardless of the source of compensation (a person month equals approximately 160 hours or 8.3% of annualized effort).”

- **Other Support page**
  
  You do not need to include the T32 fellow on the OS page for the NIH grant since he/she is already include in the RPPR D.1 if the person works 1 CM or more.

  If you are using the new NIH Other Support format, include on all other OS pages in the In “Kind Contributions” section.
Q# 33. Do I have to list former students who worked in the lab in the In Kind section? No, the NIH is requesting only active and pending In Kind donations.

Q# 34. For RPPR Other Support, if a foreign postdoctoral trainee is working in the lab with their own funding from their university, does this go under the new in kind section? Updated

Yes, if you are using the new NIH Other Support format, include in the “In Kind contributions” section.

If you are using GCO’s interim Other Support format, include in the “Lab Personnel Paid Directly by Third Party Entities” section.

Q# 35. Are summer and high school students considered an in kind contribution? Updated

Yes, if you are using the new NIH Other Support format, include in the “In Kind contributions” section.

C. Calendar Month Effort and Dates

Q# 36. Regarding project start and end dates, I noticed that the NIH sample OS page includes the Month and the Year only (e.g., 7/2021). Do I need to include the Day (e.g., 7/1/2021) too?

The NIH will accept both the Month/Year and the Month/Day/Year formats.

Q# 37. If the budget period crosses 2021 and 2022, which line does the calendar month effort go on? Updated

This question pertains to the new NIH Other Support format. The CM effort would go in the 2021. Whatever federal fiscal year the budget period begins with, the effort is listed in a row with that year.

Q# 38. If we are in year 3 of a 5 year project, do we start with number 3 or as number 1 in the calendar month effort table? Updated

This question pertains to the new NIH Other Support format. Start with number 3 and continue.

Q# 39. Regarding disclosing calendar month effort for RPPRs, do I list for the upcoming year only or all the remaining years? Updated

This question pertains to the new NIH Other Support format. List the prospective CM effort for all of the remaining years, not just the upcoming year

Q# 40. On Active Other Support, do we list total award for all project period from the current NOA or original NOA?
If you review the current NOA, you will find the amounts that were previously allotted on the first page and the amounts that are committed for the future later in the NOA. Add these amounts together for the total award.

Also keep in mind that if your grant has been awarded for many competitive segments, list the total award for all the years in the current competitive segment only. For example, if your grant has been running since 7/1/2003, do not include the total award amount starting from then. Include the total award from the most recent competitive segment which is for 5 years from 7/1/2018 to 6/30/2023.

Q# 41. Do I need to submit an OS page with my RPPR if I have the same grants as the previous year’s submission but my effort changed?

No, do not submit the OS with the RPPR. If you have for example, reported 3 active grants in last year’s OS submission to the NIH and you still have the same 3 active grants, you don’t need to report the change in effort to the NIH. These instructions remain the same.

Q# 42. I am the PI on many pharmaceutical sponsored multi-site clinical trials. I am the PI and/or Co-Investigator on many pharmaceutical sponsored multi-site clinical trials. My effort on each trial varies based upon how many participants get enrolled in the trial during a particular period and is always a very low amount. How do I list my effort on the Other Support page for these studies? New

List the trials separately and in addition, provide a reasonable cumulative calendar month estimate of effort. Industry clinical trial efforts can be listed as cumulative when the efforts are both very low and highly variable since this combined effort provides a more accurate representation of the overall time spent on these studies rather than attempting to come up with individual study efforts that lack precision.

Q #43. My subaward is in year 3 of what we expect to be a 5 year grant. What dollar amount do I put on my Other Support page? New

Most subawards on grants are obligated for a particular budget period only. Therefore, report on the total costs for 3 of the 5 years. We do not report on future budget periods in cases where the prime institution has not obligated the future year funds in the agreement. If you are awarded year 4 in the future, add the total cost of that year to the amount you are reporting. And the same is true for year 5.

Q #44: My subaward is in year 3 of what we expect to be a 5 year grant. Do I include my proposed CM for years 4 and years 5? Is the answer different if I am a Multiple PI (MPI) of a subaward? New

This question pertains to the new NIH Other Support format.

Most subawards on grants are obligated for a particular budget period only. Therefore, report on year 3 effort only. See FAQ above for more information. If you are awarded year 4 in the future, report on CM of Y4. And the same is true for year 5. This does not apply to grants on which you are an MPI for the subaward. On MPI grants, do report on the future periods.
D. Certification

Q# 45. Regarding, certifying my OS page, can I sign it and then scan it? Is this wet signature OK? Updated

This question pertains to the NIH Other Support format. Yes that is acceptable to sign with ink and then scan it.

Q# 46. What are some examples of acceptable electronic signatures? Updated

This question pertains to the NIH Other Support format. Adobe and DocuSign are examples of acceptable electronic signatures. You may wish to review this Adobe’s US Guide to Electronic Signatures for more information.

Q# 47. Can I paste my PI’s signature into the Other Support page? Updated

This question pertains to the NIH Other Support format. Never paste anyone else’s signature into a document. There are criminal liabilities and you may be in violation of the False Claims Act. If the investigator is away and isn’t not signing because he/she hasn’t seen the document, that is a serious problem. If they get charged, their defense is going to be that you forged their signature, so don’t do it.

Q# 48. Will the NIH offer the opportunity to correct mistakes before they begin prosecuting people for unintentional oversights?

You may wish to review the high profile public cases of investigators who have been indicted. Please be aware that many defendants claim unintentional oversight. Click here for a recent example.

Q# 49. Should the Investigator sign the draft of the OS page before submitting to the GCO? Updated

This question pertains to the NIH Other Support format. GCO will accept signed and unsigned drafts.

Q# 50. Does the investigator sign off on his/her OS page each time he/she submits the OS page to the NIH? For example, we are including the investigator’s OS page for 5 different submissions to the GCO. Does the investigator need to sign each time? Updated

This question pertains to the NIH Other Support format. Yes, each OS page is unique. The overlap statement that he/she are including will be unique for each submission since you are comparing that particular grant with all the other entries on the page.

Q# 51. How do I know if my investigator is giving me accurate, comprehensive information? How do I verify this? Can I assume that the GCO will verify the information as part of a review?
The federal government is aware there is information that administrative staff and the GCO will not know. That is why they are now requiring the investigators to sign off on the other support on the new NIH format. The GCO confirms information against the InfoEd database and conformity with NIH guidelines.

E. Gifts

Q# 52. Do gifts need to be reported on the Other Support pages?

Gifts do not need to be reported on the Other Support Page. The NIH defines gifts as follows:

Gifts are resources provided where there is no expectation of anything (e.g. time, services, specific research activities, money, etc.) in return.

An item or service given with the expectation of an associated time commitment is not a gift and is instead an in-kind contribution and must be reported as such.

Q# 53. Do philanthropic donations go on the Other Support page? Does it meet the definition of gift in the FAQ above? If so, it is a gift and does not need to be reported. Some philanthropic donations may need to be reported as in kind contribution. We will need more information from you to consider.

Q# 54. Does my international award need to be disclosed on the Other Support page?

It depends. Is it a grant? If so, yes include and you will also be including CM effort that does count towards your effort and your 12 calendar months.

If it is not a grant, we will need more information from you to determine if this is an in kind contribution.

Q# 55. A foundation has provided my department a challenge grant, which provides unrestricted funds for general research activities such as the purchase of supplies. This funding is used across multiple funded and unfunded projects. The foundation requests that we refer to this grant at meeting presentations and papers.

Do we need to include this as in-kind support? Would all investigators need to include it? Would they then refer to the total award amount, or need to figure out how much of the award they have accessed?

If the funds are truly unrestricted, and there is no expectation of anything (e.g. time, services, specific research activities, money, etc.) in return, then this is a gift that does not need to be disclosed.

If the funds are not a gift, then this is a monetary resource that should be listed in Other Support, with the total award amount provided.

F. GCO and Institutional Resources
Q# 56. Will the GCO Grants Specialist be able to provide Total Costs for each project?

Yes, but the GCO expects that once people receive that information that they will maintain it. We understand that you don’t have access to other department’s grants information and you’re going to need to contact GCO.

Q# 57. Has the GCO considered creating an OS template so that we all use a relatively standardized format, especially in lieu of the factors, the NIH isn’t expected to do so until 2022?

The Office of Research Services is working on a template.

Q# 58. Will GCO provide examples of each of these new documents?

Please refer to the NIH samples of the Biosketch and Other Support pages. If you wish to use the GCO interim Other Support sample page format, click here.

Q# 59. Is Mount Sinai considering creating an Office of Other Support rather than involving hundreds of people across the institution and causing much confusion?

We’re working with the Office of Research Services to create and collect other support information in a standard way and to maintain foreign agreements.

Q# 60. Will GCO be working with COI Office to be able to share with departments copies of consulting agreements and COI disclosure forms which list some of the requested information?

Yes and No. We are going to accept the investigator’s word for items that the NIH does not require. For example, if an Investigator signs that the agreement is 10,000 we are not requesting a copy. We may revisit this at a later date. Also keep in mind that the investigator is signing the OS form acknowledging that false, fictitious, or fraudulent statements or claims may subject him/her to criminal, civil, or administrative penalties.

The COI office already allows GCO access to see if a yes has been answered to foreign agreements. Keep in mind those actual agreements need to go to the NIH under the new regulations. GCO has been working with COI to make sure that the mandatory disclosures are there for foreign appointments.

Q# 61. With all these new requirements, have departmental processes changed for OS page review? No, the departments are still involved in the Other Support review process. Keep in mind that department administrators may not have knowledge of in kind contributions and other appointments so make sure the investigators are involved in the review of this page.
Q# 62. How do we help foreign subawardees and other subaward sites unfamiliar with the process? How can we best ensure that everything is correct?

GCO is planning on a presentation. More information will follow.

III. Facilities & Other Resources and Equipment Pages

Q# 63. Do we need to assign monetary value on Facilities Page? Do we need to list $s there?

No, a dollar value does not need to be assigned to an in kind contribution on the Facilities and Other Resources and Equipment pages.