

Policy on National Institutes of Health (NIH) Other Support

Policy: Marquette University requires all Senior/Key Personnel on proposals to or awards from the National Institutes of Health (NIH) to disclose all research activities and affiliations (active and pending) in Other Support at the time of Other Support submission in compliance with [NOT-OD-25-133](#) (New Policy Requirement to Train Senior/Key Personnel on Other Support Disclosure Requirements).

To maintain compliance, the university must provide training to all faculty and researchers identified as [Senior/Key Personnel](#) on the requirement to disclose all research activities and affiliations (active and pending) in Other Support (see [Other Support form](#)). Specifically, Marquette University must implement trainings, in addition to maintaining a written and enforced policy, on requirements for the disclosure of other support.

Purpose: All Senior/Key Personnel on proposals to or awards from the NIH must fully understand their responsibility to disclose all resources made available to them 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.

WHO is required to take the training: The Other Support training applies to [Senior/Key Personnel](#) who are completing Other Support requirements for the National Institutes of Health or any other Sponsor explicitly requiring this training. Senior/Key Personnel refers to those individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they receive salaries or compensation under the grant. This may include Principal Investigators, Project Directors, Co-Investigators, consultants or any other individual who meets this definition.

WHEN: Identified individuals are required to take the training prior to completion of the Other Support form.

PROCESS:

Identification

Senior/Key Personnel are identified as follows:

- At the time of application when Other Support forms are required. Project Planning and Development (PPD) team or Grants Administration team identifies individuals when they are notified that a PI is submitting an application that requires inclusion of Other Support forms.
- At the time of submission of Other Support forms as Just-In-Time information. The PPD team or Grants Administration team identifies individuals when they are notified that Just-In-Time information is being requested.
- At the time of submission of an RPPR that requires Other Support to be included. The Grants Administration team identifies individuals when an RPPR is due that includes Other Support information (typically not required in a final RPPR (FRPPR)).
- PIs may notify the PPD team or the Grants Administration team if they would like to take the training.

Requirement

All Senior/Key Personnel on proposals to or awards from the NIH are required to review the following information:

- NIH Grants and Funding - Other Support topic page: [Other Support | Grants & Funding](#)
- NIH Pre-award and Post-award Disclosures Related to the Biographical Sketch and Other Support: [NIH Disclosures Table](#)
- NIH Other Support Instructions: [NIH Other Support Instructions](#)
- [NIH Other Support Format Page](#)
- NIH Grants Policy Statement: 2.5.1 [Just-in-Time Procedures](#)

The PPD or Grants Administration team will send the above requirements via e-mail message to the Senior/Key Personnel.

The Senior/Key Personnel will certify completion of training, understanding of the NIH Other Support requirements and verification that the Other Support form is complete and in accordance with NIH regulations via the signature block on the Other Support form signed via DocuSign.

Disclosure

Other Support disclosures must include all active and pending resources, whether monetary or in-kind, internal or external, domestic or foreign.

Other

The Office of Research and Sponsored Programs (ORSP) will review disclosures for adherence to NIH formatting and submission requirements. ORSP does not verify the substantive accuracy or completeness of the information disclosed; accuracy remains the responsibility of the Senior/Key Personnel.

Other Support forms will not be submitted to NIH if an Investigator is lacking compliant training or if the form is noticeably incomplete. Further, NIH may withdraw applications, suspend awards, or impose additional oversight if disclosures are found incomplete or inaccurate.