

Sacramento State

Research Integrity and Compliance Procedure for NIH Other Support & Training Requirements

1. Purpose

To ensure compliance with NIH requirements for full and accurate disclosure of Other Support by all Senior/Key Personnel. This procedure establishes institutional expectations, training requirements, and enforcement mechanisms.

2. NIH Policy Requirement and Applicability

Who Completes Other Support

All individuals designated in an application as senior/key personnel, **except**

- Program Directors, training faculty, and other individuals involved in the oversight of training grants
- Individuals categorized as Other Significant Contributors

What is Other Support

Must disclose Other Support, including:

- Resources and/or financial support from all foreign and domestic entities, that are available to the researcher. This includes but is not limited to, financial support for laboratory personnel, and provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.). Institutional resources, such as core facilities or shared equipment that are made broadly available, should not be included in Other Support, but rather listed under Facilities and Other Resources.
- Consulting agreements, when the PD/PI or other senior/key personnel will be conducting research as part of the consulting activities. Non-research consulting activities are not Other Support.
- In-kind contributions, e.g. office/laboratory space, equipment, supplies, or employees or students supported by an outside source. If the time commitment or dollar value of the in-kind contribution is not readily ascertainable, the recipient must provide reasonable estimates.

Other support does not include training awards, prizes, or gifts. 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.

When to Submit Other Support

1. **At Just-in-Time (JIT):** PI and key personnel must submit updated Other Support using NIH templates.
2. **At Research Performance Progress Report (RPPR) stage:** Updated Other Support for all key personnel.
3. **New or undisclosed support:** Must be reported to OSP as soon as it becomes known.

3. Training Requirement

Effective **October 1, 2025**, and in compliance with NOT-OD-25-133, all Senior/Key Personnel must receive training on disclosure requirements. As disclosure occurs at the Just In Time stage, this training must be completed at or after proposal submission and prior to Just In Time.

Training Methods

- CITI Research Security Training course, and
- NIH Other Support Training SharePoint guide.

Training Components

- Research Security
- Overview of NIH Other Support definition and scope.
- Examples of what must be disclosed (federal, non-federal, foreign, in-kind, appointments).
- Differences between NIH “Other Support” and NSF “Current & Pending Support.”
- Links to guidance on using NIH templates and e-signatures.
- Case studies on **common errors/omissions**.
- Consequences of noncompliance (delays, withdrawal of funding, enforcement actions).

Tracking Completion

- CITI training is verified in the CITI program by the Research Integrity and Compliance Officer
- PIs verify NIH Other Support SharePoint training in the Conflict of Interest disclosure form in Cayuse Outside Interests.

4. Responsibilities

- **Senior/Key Personnel:** Accurate and complete disclosure.
- **Research Development Specialist (ORIED):** Assist investigators with questions, review for completeness.
- **Research Compliance (ORIED):** Verify submissions, provide training, monitor compliance.

Institution: Maintain records of training completion and policy enforcement.

5. Enforcement

- Noncompliance may result in delayed submission, withdrawal of proposals, or restriction from participating in NIH-funded research until resolved.
- NIH may take enforcement actions (withhold awards, suspend funding).

6. Recordkeeping

Office of Research maintains records of training completion and Other Support training certification indefinitely in the CITI and Cayuse platforms.