

Frequently Asked Questions FAQ

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Other Support

- 1 Q. What is Other Support?
 A. The term “other support” is specific to NIH and entails the submission of information regarding research funding that is either active (awarded) or pending review or award. The information needs to be submitted for all key personnel and needs to include all financial resources, whether federal, non-federal, commercial or organizational, foreign or domestic, available in direct support of an individual's research endeavors, including, but not limited to, research grants, cooperative agreements, contracts, or organizational awards. Training awards, prizes, or gifts do not need to be included. The full description of NIH “Other Support” is found at <https://grants.nih.gov/grants/forms/othersupport.htm>.

- 2 Q. What is the difference between “Responsible” personnel and “Senior Key” personnel?
 A. “Senior/Key” personnel is defined as the program director/principal investigator (PD/PI) and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they request salaries or compensation. PD/PI(s) are always considered senior/key personnel. Remember that a person can be “Responsible” and not be “Senior/Key.” “Responsible” from a conflict of interest definition would be the PD/PI and any other person who is responsible for controlling the design, conduct, or reporting of research. When determining whether an individual is “Responsible” consider the following:
 - the role, rather than the title, of those involved in research,
 - the degree of independence with which those individuals work; and
 - the level of responsibility of individuals who, as part of an investigative team, will assist the PI/PD and make a direct and significant contribution to the data.

- 3 Q. If I am a Core or Recharge Director, should I list the core or recharge personnel as being part of my associated personnel for my own research program?
 A. No. You should not list these individuals as they are resources to the core/recharge center and not your own research program. You should be paying the same core or service center charges as all other investigators.

- 4 Q. If I am a backup investigator on an industry sponsored clinical trial for IRB purposes, specifically to see a patient with an SAE, should I list this on my Other Support active project list?
 A. No. You should not list this project because you have no assigned effort and your availability is on a backup/emergency basis only.

- 5 Q. Do I need to list undergraduate student volunteers or work study students in my lab on my Other Support list for lab members?
 A. No. These students would not be considered to be a resource in your lab because they are there for a learning experience only.

- 6 Q. Do I include subaward personnel under the Support For Laboratory/Research Members section on my Other Support if I have subawards involved in the research?

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- A. No. You do not have to include the subaward lab staff. The subaward Principal Investigators should submit their own OS if they are part of the grant. If they are independent researchers, then they should not include them in their laboratory member table
- 7 Q. Do I include VA-funded research on my Other Support?
- A. Yes. VA-funded research should be included showing percent effort (or person-months). We're expected to show all research, regardless of funding. However, when you have both VA-funded research and research that is proposed through UAB, the support (your percentage of effort (or person-months) from each funding source should be clearly and separately delineated on the Other Support pages for both institutions so that the separate appointments can be considered independently when determining any overlap. The University effort should agree to the committed effort levels on the budget pages.
- 8 Q. Do I include UAB Start-up packages on the Other Support?
- A. No. You do not have to report UA startup packages...or any other UAB funds that are not separately budgeted for. UAB bridge funding and retention packages are separately accounted for in the general ledger.
- 9 Q. Under the "Relevant Scientific Appointments" section, should the appointment date be their hire date in a faculty role at UAB or when they were promoted to their current title (ie. Professor)?
- A. It should be when they were promoted to their current role/title meaning you would need to list all roles/appointments with any research component.
- 10 Q. Do I include industry-sponsored clinical trials in the Other Support (OS)?

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- A Yes. Clinical trials should be listed on the OS for the PI and other senior/key personnel.

There are two considerations based on whether or not your department uses an Operating Account*:

1. If an Operating Account is not being used and effort is assigned to each study, then the OS would list each project individually with the appropriate level of proposed (for pending projects) or awarded/assigned effort (for active projects) consistent with any other active or pending project.
2. If there is an Operating Account, the following blanket statement may be used and the trials would be listed below the blanket statement without listing effort on each individual project:

“In addition to the grants listed above, Dr. ___ is involved in clinical trials. The cyclic and unpredictable nature of the activities in these trials makes it impossible to assign a precise percent effort for each trial. Dr. ___ has reviewed his/her clinical study obligations and confirms that the aggregate effort on all trials listed below does not exceed ___ % of institutional effort.”

The

percentage assigned in the above blanket statement is the **percentage assigned to the Operating Account.**

- * [Operating accounts are established by Financial Affairs.](#) If you are unsure about whether you have an operating account, please contact your school's dean's office.

- 11 Q, What if UAB is a subaward on another institutions grants– do we list total cost awarded to UAB only?
- A. You should list the UAB subaward total dates and total dollars since UAB is not prime.

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- 12 Q, For the OS Lab Member Table, should every funding source for each person be listed or just the funding provided by projects of the PI of the grant for which the Other Support is being submitted?
A. Each senior/key personnel on the JIT or RPPR (progress report) should have their own Other Support page which must show every lab member's funding source, including external and foreign. Ex: must include the post doc from another country in the lab even though she is funded by home institution.
- 13 Q, What if NIH has a page limit of 3 pages for an Other Support report for a K99 (or any other grant with a page limit for OS)?
A. In this instance, it is ok to leave off the laboratory member table. During JIT, NIH may ask for an updated full OS for senior/key personnel.
- 14 Q, Do I only list the staff that's relevant to my lab (e.g., the salary attributed to my grant specifically)?
A. Yes. Only list those that are relevant to your lab regardless if they're being paid or not. If they have access to the research information and/or data, IP, etc. they will need to be listed.
- 15 Q, Should I list a transactional appointment for a speaking arrangement on my Other Support?
A. No. However, you may consider placing this transactional appointment on your Biosketch.
- 16 Q, Whom should I contact if I have questions about what to include in my Other Support
A. You should contact your assigned OSP Officer. You can find your OSP Officer at <https://www.uab.edu/research/administration/offices/OSP/Pages/OSP-Staff.aspx>.
- 17 Q, Where are the NIH instructions for Other Support?
A. The full description of NIH "Other Support" is found at <https://grants.nih.gov/grants/forms/othersupport.htm>.
- 18 Q, Should we list the salary support received from a UAB administrative supplement from UAB that research-related purposes?
A. Yes
- 19 Q, Should we list the K grants where one has been listed as part of the mentoring team but drawing no salary support (0 CM)?
A. Yes, you should list them on your Other Support report but instead of putting 0 CM, put "Mentor."
- 20 Q, Should I list grants where the PI is unable to draw effort and mention as 0 CM?
A. No, you cannot list any active or pending grant with 0 CM as NIH says that is not possible. The NIH position is that every PI has to have some effort to lead a project. At a minimum, you should list 0.12 CM (this equals 1% effort) or their actual expended effort for the reporting period, which is every 6 months at UAB, whichever is greatest.
- 21 Q, Do we need to list the administrative appointments within UAB or simply the primary faculty appointment would suffice?
A. You only need to list the primary appointment at UAB. Any other external appointments, paid or unpaid, should be shown separately on their Other Support.
- 22 Q, I have a PI who has a large grant with several subawards. Do we need to include all of the subaward personnel and their support on this PI's Other Support report?
A. No, subaward personnel should not be listed on the PI's report since they are not resources to his/her research program.
- 23 Q, Does NSF want Other Support and if so, is it the same format?

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- A. Yes, but it is called Collaborators and Other Affiliations Information (COA). The template can be found here: https://www.nsf.gov/bfa/dias/policy/coa/faqs_coatemplatemay18.pdf. The NSF requires that Collaborators and Other Affiliations information must be separately provided for each individual identified as senior project personnel. The COA information must be provided through use of the COA template. The template has been developed to be fillable, however, the content and format requirements must not be altered by the user. This template must be saved in .xlsx format and directly uploaded into NSF's electronic systems as a Collaborators and Other Affiliations Single Copy Document.

International Research Collaborations

- 24 Q, What are the primary concerns of the federal government funding agencies with regard to undue foreign influence?
- A. The federal government is concerned about the following:
- Undisclosed foreign collaborations (funded and unfunded)
 - Participation in foreign "talent programs"
 - Infringement on academic freedom
 - Undisclosed or unmanaged conflicts of commitment
 - Undisclosed financial conflicts of interest
 - Diversion of intellectual property to others, including foreign entities
 - Unauthorized transfers of confidential data
 - Non-compliance with export-control laws and regulations
 - Unauthorized disclosures of confidential proposal information by reviewers who share
 - the information with others, including foreign entities, or otherwise attempt to influence
 - decisions
- 25 Q, Have there been any findings of deliberate violations or misrepresentations so far and if so, what ramifications or results of investigations have happened thus far?
- A. Recently, NIH sent 180 letters to more than 60 U.S. institutions where scientists are suspected of violating disclosure rules related to sources of funding and outside employment. On August 20, 2018, NIH sent a letter to the research community broadly stating the responsibilities to comply with NIH policies and US regulation and to responsibly disclose all foreign collaborations and relationships.
- In June 2019, NIH published an article about foreign ties in the biomedical research community. <https://www.sciencemag.org/news/2019/06/nih-probe-foreign-ties-has-led-undisclosed-firings-and-refunds-institutions>.
 - In August 2019, the US Department of Justice released information about a University of Kansas faculty member indictment under the charge of fraud for Failing to Disclose Conflict of Interest with Chinese University: <https://www.justice.gov/opa/pr/university-kansas-researcher-indicted-fraud-failing-discloseconflict-interest-chinese>
 - In January 2020, the Department of Justice announced that the Chair of Harvard University's Chemistry and Chemical Biology Department and two Chinese nationals were charged in connection with aiding the People's Republic of China. Dr. Charles Lieber, 60, Chair of the Department of Chemistry and Chemical Biology at Harvard University, was arrested and charged by criminal complaint with one count of making a materially false, fictitious and fraudulent statement. Yanqing

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Ye, 29, a Chinese national, was charged in an indictment with one count each of visa fraud, making false statements, acting as an agent of a foreign government and conspiracy. Ye is currently in China. Zaosong Zheng, 30, a Chinese national, was arrested on Dec. 10, 2019, at Boston's Logan International Airport and charged by criminal complaint with attempting to smuggle 21 vials of biological research to China. On Jan. 21, 2020, Zheng was indicted on one count of smuggling goods from the United States and one count of making false, fictitious or fraudulent statements. He has been detained since Dec. 30, 2019. <https://www.justice.gov/opa/pr/harvard-university-professor-and-two-chinese-nationals-charged-three-separate-china-related>

- 26 Q, Do I need to report outside professional activities or research collaborations to funding agencies, and when?
- A. Yes, you need to report both outside professional activities and research collaborations. Depending on the federal agency, the form/format may be different. For example, NIH requires the Other Support form. UAB has established a revised Other Support Form for UAB researchers. The form and instructions can be found at <https://www.uab.edu/research/home/transparency-in-research>.

Prior to engaging in external professional activities, faculty and staff must request advance approval in the activity outside the UAB Enterprise. Examples of these activities include:

- external employment, including moonlighting and/or locum tenens activities;
- consulting;
- lecturing, presenting, or speaking;
- establishing and/or supporting a start-up company;
- serving as an expert witness;
- participating in a board of directors; or
- participating in a scientific advisory board.

If approved by the department and school, for those individuals involved in UAB research, pertinent information about the activity will be communicated to the CIRB for inclusion in the individual's financial interests profile in IRAP. As such, there is no need to separately report approved external activities to the CIRB Office or to include the same information in a Disclosure of Financial Interests.

- 27 Q, Do collaborations without funding need to be reported?
- A. NIH: Foreign collaborations involving NIH funding have always required prior approval. Recent congressional concern over the U.S. losing intellectual property to foreign countries has led to a reminder announcement in May, close review of publications cited in Research Performance Review Reports to confirm compliance, and a special announcement by NIH Director Collins. The latest NIH announcement reiterates that the policy applies to foreign conduct of any of the work scope, inclusive of subawards, regardless of the source of funding. A "foreign component" is defined as the performance of any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, whether or not grant funds are expended. Based on program officer reviews recently received, such involvement includes unfunded collaborations with a foreign entity or a foreign person, including visiting scholars, graduate students,

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and fellows funded by their home country, exchanging material and/or data, or other use of foreign resources.

NSF: Requires that “...any substantial collaboration with individuals not included in the budget should be described in the Facilities, Equipment and Other Resources section of the proposal (see Chapter II.C.2.i) and documented in a letter of collaboration from each collaborator. Such letters should be provided in the supplementary documentation section of the FastLane Proposal Preparation Module and follow the format instructions specified in Chapter II.C.2.j. Collaborative activities that are identified in the budget should follow the instructions in Chapter II.D.3.”

- 28 Q, When do outside professional activities need to be reported to UAB?
 A. In addition to the External Activities request, UAB requires employees to be aware of potential conflicts of interest and commitments. It is important for faculty and staff to read and understand the UAB [policy](#) on conflicts of interest. Each investigator is required to disclose to UAB all financial interests related to his/her institutional responsibilities that are owned or held by him/her, his/her spouse, or his/her dependents prior to the application for research and **within 30 days** of discovering or acquiring new financial interests. **Investigators must update any such disclosed financial interests not less than annually while involved in research.** It is also important for faculty and staff to read and understand the UAB [policy](#) of outside employment and consulting.
- 29 Q, Why can't my department chair simply approve my request via email or verbally?
 A. It is a responsibility of department chairs and other unit heads to ensure that faculty and staff in their units are familiar with UAB policies and procedures relating to outside professional activities, conflicts of interest, conflicts of commitment, as well as those related to extramurally sponsored funding.

Export Control

- 30 Q, What is an export and what are export control laws and related UAB policies? [LAST UPDATE: 8/1/2019]
 A. actual shipment of goods or carried during international travel, as well as when information is transmitted to a person or entity in a foreign country, whether in writing, or via email, phone, fax, internet, and verbal conversations. The UAB policy for Export Control can be found here: <https://www.uab.edu/policies/content/Pages/UAB-AD-POL-0000686.aspx>. In order to help you determine if an export control license is necessary for an activity you need to do (ship, transmit, or transfer an item, material, information, etc.), the UAB Office of Compliance and Risk Assurance has a [decision tree](#) on its website.

Please be aware that simply discussing certain information with a non-U.S. person, even if that discussion occurs on campus, may be a deemed export. In some cases, allowing a non-U.S. person access to an item can be considered an “export” of technical information if that technology is a sensitive prototype that hasn't been released yet in commerce. U.S. export laws control certain technologies (both military and commercial) and govern what technologies can be sent abroad or shared with non-U.S. person. A U.S. person is defined as a citizen or permanent resident (sometimes called a “green card holder”).

Export Control Laws and Regulations: These include, but are not limited to, ITAR, EAR, and OFAC:

ITAR (International Traffic in Arms Regulations): Regulations governing the exports and re-exports of items and services for military use, which include defense articles, including technical data, defense technologies, and defense services. These regulations are under the jurisdiction of the U.S. Department of Defense. (22 CFR Parts 120-130).

EAR (Export Administration Regulations): Regulations governing the export, including deemed export and re-export of dual use commercial items and technologies and other commercial items and technologies without an obvious military use. These regulations are under the jurisdiction of the U.S. Department of Commerce. (15 CFR Parts 730-774).

OFAC (The Office of Foreign Assets Control): The federal government office responsible for administering and enforcing foreign asset control regulations. This includes economic and trade sanctions based on federal foreign policy and national security goals against targeted foreign countries, terrorists, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction. The regulations administered by OFAC include controls with regard to specific individuals, specific organizations, and certain countries. OFAC is under the U.S. Department of the Treasury. (31 CFR Parts 500-598).

- 31 Q, Are my research or service activities export controlled?
- A. It depends. Fundamental research that is intended to be published without sponsor restrictions (i.e. no non-disclosure agreements, publication approval requirements, foreign national restrictions, etc.) is generally excluded from export laws. That said, to be certain, you should review the UAB [decision tree](#) to determine the correct answer. If you need any assistance, please contact the **University Compliance Office** at (205) 996-6540 or compliance@uab.edu.