

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

Last updated: 8/24/21



**Mount
Sinai**

NIH Updated Implementation Plan



GCO last updated: 5/11/21

- 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.



Biosketch Changes: All Active Appointments

The GCO submitted a question to the NIH regarding the requirement to list all appointments in the Biosketch 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 Positions and appointments that are no longer active are optional, and may be included as appropriate in support of the application.



Biosketch: Alternative Names



Please note these additional instructions for the NIH Biosketch.

- Indicate whether you have published or created research products under another name.

Please follow GCO's guidelines on addressing this.

- In Section A, at the end of the Personal Statement, please add a sentence indicating whether you have ever created or published research products under another name.



GCO's Response to NIH's Updated Implementation Plan

Biosketch

- ✓ New Biosketch format is in effect.

Other Support (OS): New NIH Format & GCO Interim Format Acceptable

You may use the new NIH format or continue to use the old format. However, if you use the old format, you must update as follows:

- ✓ Use Project Period Total Costs rather than Annual Direct Costs for active and pending awards.
- ✓ Include an "Other Appointments and Outside Employment" 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.
 - o If none, state "none" in this section.
- ✓ Include a "Lab Personnel Paid Directly by Third Party Entities" section.
 - o List name, title, and outside entity.
 - o If none, state "none" in this section.
- ✓ You may wish to review [GCO's Interim Format Sample Page](#)



It has always been required to report all grants from all appointments.



Additional Other Support Changes Since NIH's Initial Announcement

- ✓ Do not include completed projects/proposals on the Other Support.
- ✓ Uniform Instructions for JIT and RPPR Other Support pages.
RPPR was previously active projects/proposals only.





NIH's Updated Implementation Plan

Other Support: 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 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.

However, it is expected that recipients will report failures to disclose within no later than 30 days.

