

DISCLOSURE OF CURRENT AND PENDING SUPPORT
October 2007
Policy 1.1.16

Policy:

Disclosure of all current grants on which a Principal Investigator (PI) and key personnel are working, as well as pending support, is necessary when an application is selected to receive a grant award. The Principal Investigator is required to notify Sponsored Program Administration (SPA) personnel whenever effort is changed on a project, regardless the amount of effort changed.

Purpose:

The disclosure of other support a PI or key personnel is receiving is a requirement of sponsoring agencies in order to determine time commitments to projects and to avoid effort and scientific overlaps. Key personnel are defined as the PI and other 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. Typically these individuals have doctoral or other professional degrees, although individuals at the masters or baccalaureate level may be considered key personnel if their involvement meets the definition. Consultants may also be considered key personnel if they meet this definition. "Effort of zero person months" or "as needed" are not levels of involvement for those designated as key personnel.

"Other support" includes all financial resources, whether Federal, non-Federal, commercial or institutional, available in direct support of an individual's research endeavors, including, but limited to research grants, cooperative agreement, contracts, or institutional awards. Other support does not include training awards, prizes, or gifts. The faculty member is responsible to ensure that his or her "other support" page is complete and accurate considering the faculty member is in the best position to know his or her time commitments and potential sources of support.

Current and pending support must be disclosed whether or not salary is being provided by the project(s). This includes federal, non-federal, industry or institutional support; any grants in direct support of research are considered "other support".

Procedures:

"Other support" information is required for all applications that are selected to receive grant awards. Unless otherwise specified in a Request for Application (RFA), the Principal Investigator should not include information on other support in the grant application submission. However, for NIH applications, the PI should be prepared to follow "just-in-time" procedures to submit current and pending other support information upon the request of NIH staff when the application is under consideration for NIH funding. The PI shall report any changes in other support to NIH as a part of the annual process.

A current and pending support disclosure shall contain the following information:

- Name of Principal Investigator
- Sponsor
- Award number assigned by the sponsor
- Title of the project
- Project start and end dates
- Award amount
- Percentage of effort committed
- Names of other sponsors to whom the proposal is being submitted

In the case of industry-sponsored clinical trials for which there will only be a very small or unpredictable amount of effort devoted to each trial, the faculty member may include the following language as part of the other support information submitted to sponsoring agencies:

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

The amount of time allocated to each of the current and pending projects cannot exceed 100% (i.e. 12 person months) effort combined. If time commitments exceed 100% effort, a justification is necessary to inform the sponsor of how the time will be reallocated to meet all commitments.

Key personnel effort changes require NIH prior approval:

- Withdrawal from the project

- Absence for any continuous period of three months or more
- Reduction of time devoted to the project by 25% or more from the original effort indicated in the approved application

Responsible Parties:

Principal Investigators

Exemptions:

None

Related Policies and Links:

KUMC Research Institute Policy 1.1.01: Principal Investigator Eligibility: <http://www.kumc.edu/Documents/ri/spa/PIEligibility.pdf>
KUMC Research Institute Policy 2.1.02: Time and Effort Reporting: http://www.kumc.edu/Documents/ri/spa/Time_Effort_Reporting.pdf
KUMC Research Institute Sponsored Programs Administration Proposal and Budget Preparation Development
<http://www.kumc.edu/kumc/sponsored-programs-administration/proposal-development.html>
NIH Grants Policy Statement <http://grants.nih.gov/grants/policy/nihgps/index.htm>

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