

NIH's Guide Notice NOT-OD-21-073: Institutional Perspective

June 8, 2021

Moderator:

Kristin West, Director, Research
Ethics & Compliance, COGR



Panelists (in order of presentation):

Naomi Schrag, Vice President of
Research Compliance, Training and
Policy, Columbia University



Lisa Mosley, Executive Director, Yale
University



Grace Fisher-Adams, Chief
Research Compliance Officer,
California Institute of Technology



Presentation Overview

- NIH [NOT-OD-21-073](#), *Reminders of NIH Policies on Other Support and on Policies related to Financial Conflicts of Interest and Foreign Components*
 - New Biosketch and Other Support format pages
 - Effective Date: May 25, 2020
 - NIH [NOT-OD-21-110](#): New formats are not mandatory until January 25, 2022
- Presentation Focus Areas – Considerations & Tools
 - Summary of Requirements
 - Positively promoting international collaborations in the current environment
 - Consulting
 - Clinical Trials
 - Valuation
 - Gifts
 - Coordinating information from different units; controls
 - Collaborations
 - Training & Communication



Ironing Things Out

- Many institutions still working on policies and practices.
- Like other requirements, a certain degree of interpretation and institutional decision-making is required for implementation.
- One shot at training!

Positively Promoting International Collaborations

How to foster this:



Picture: <https://www.enago.com/academy/how-collaborations-increase-the-impact-of-research/>

When headlines look like this:

The New York Times

A Scientist Is Arrested, and Academics Push Back

<https://www.nytimes.com/2021/01/26/us/mit-scientist-charges.html>

 **REUTERS**

U.S. doubles down on protecting university research from China

<https://www.reuters.com/world/china/us-doubles-down-protecting-university-research-china-2021-03-01/>

 **abc NEWS**

Russia tried to hack coronavirus vaccine research, US, UK and Canada say

<https://abcnews.go.com/International/us-uk-canada-claim-russia-hack-coronavirus-vaccine/story?id=71818654>

Consulting

Requirement: Sr./Key Personnel must report consulting agreements as "Other Support" if they are "conducting research" as part of the consulting activities.

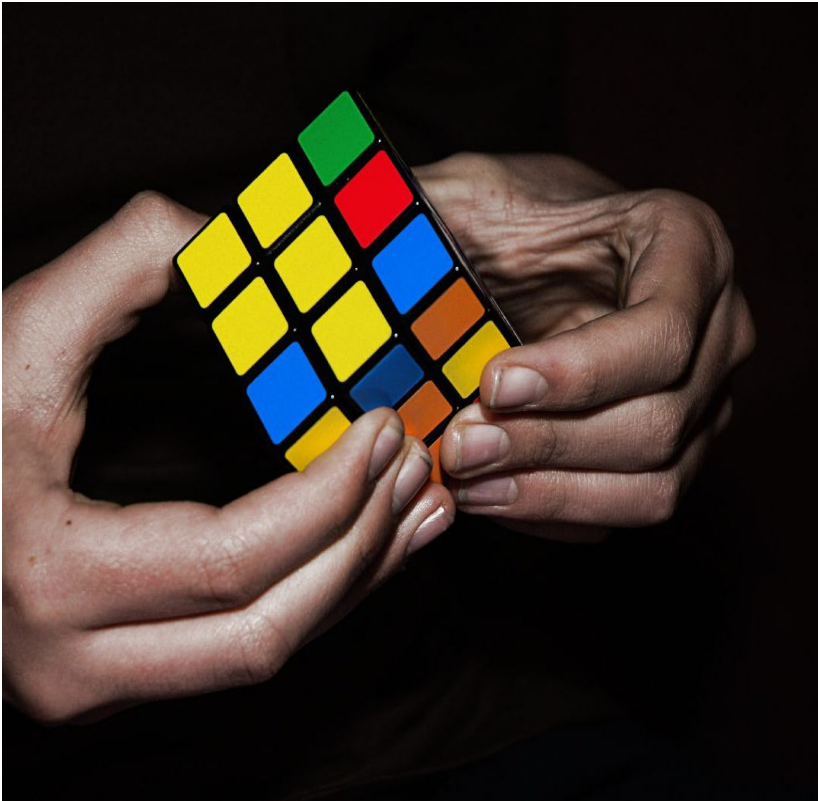
Considerations:

- Treatment of consulting activities that fall within institution's consulting guidelines (i.e., "one day a week").
- Pros and cons of reviewing consulting agreements.
 - Institutional review raises complex issues
 - Is it possible to train faculty to review them and certify they meet institutional standards? Does this approach decrease or increase potential for institutional liability?

Consulting: The “Effort Conundrum”

- Under the Uniform Guidance, “effort” is based on Institutional Base Salary (IBS), which does not include external activities by definition and is not based on a particular number of hours per week or other metric. (see COGR’s *Principles for Evaluating Conflict of Commitment Concerns in Academic Research* at 21)
- Uniform Guidance also provides that outside professional activity must be conducted in accordance with institutional policies (Sec. 200.430(c))
- Other Support instructions ask for “actual effort” on consulting that involves the conduct of research, in calendar months.

Consulting: The Effort Conundrum



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- Where the consulting engagement does not include an effort commitment in calendar months, is it possible to disclose an estimated number of days per year spent on the activity?
- “This project is professional activity outside of my institution, as defined in the Uniform Guidance, 2 CFR § 200.430(c), and carried out in accordance with institutional policy on outside activities. I spend approximately _____ days per quarter/year on this outside activity.”

Clinical Trials: Effort and In-Kind Contributions

Considerations:

- Are industry-sponsored clinical trials part of “research endeavors” or “clinical activities”?
- What about investigator-initiated clinical trials?
 - How should donated investigational items (drugs, devices) be treated?



Valuation

Requirements:

- In-Kind Other Support includes provision of "high-value" materials that are "not freely available" (e.g., biologics, chemicals, model systems, technology, etc.)
- Time commitment or dollar value of in-kind contributions (or reasonable estimate thereof) must be provided.

Considerations:

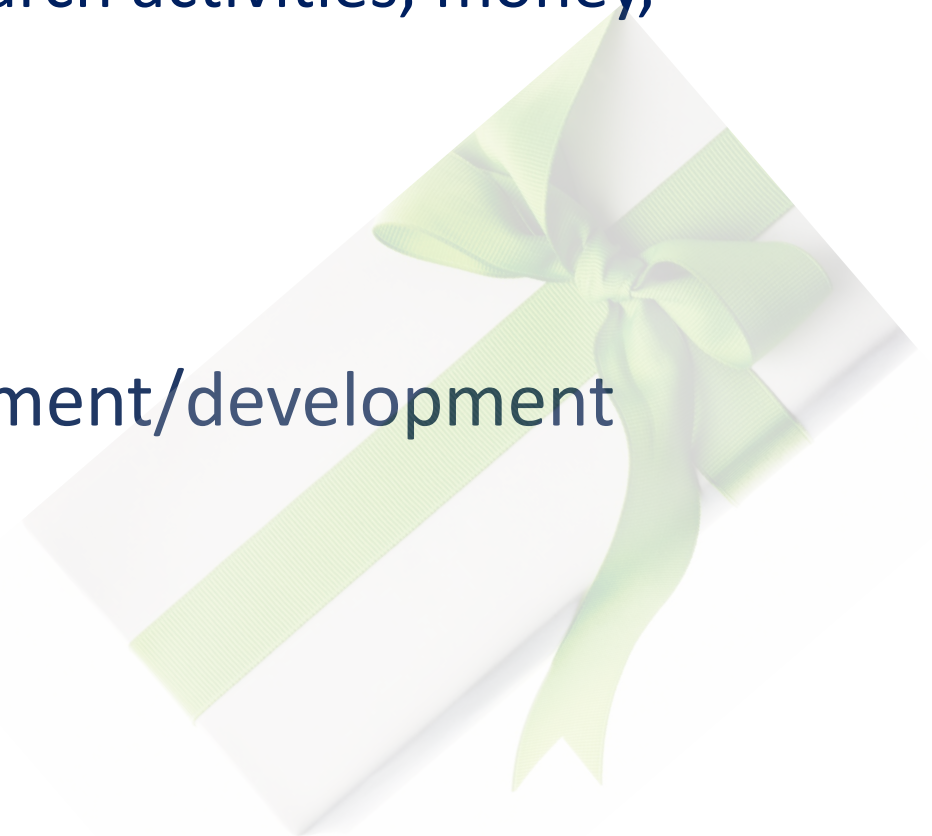
- Definition of "high-value."
- How to value items on which no value can be placed, e.g., human specimens?
- Who will determine values?

Gifts

Requirements: Reporting is not required for training awards, prizes or gifts (i.e., resources provided where there is no expectation of anything, e.g., time services, specific research activities, money, etc. in return).

Considerations:

- Gift v. grants policies.
- Coordination with institutional advancement/development offices.



Inter-Unit Coordination & Controls

Requirements: Institutions must "establish and maintain effective controls (e.g., policies and procedures)" to ensure Sr./Key Personnel fully disclose Other Support to institution as soon as it becomes known.

The Situation “On-the-Ground”:

- Information is housed in different units.
- Units may have different IT systems that don't communicate.
- All institutions may not have university electronic signature systems.

Considerations:

- How to ensure consistency and alignment of information?
- How to promote cross-communications between units and systems?
- Testing? Validation?

Informing Researchers What to Report

- [Penn State University Questionnaire on Other Support & Foreign Component Disclosures](#)



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NIH Questionnaire for PSU Faculty (Other Support Forms and Foreign Component Disclosures):

NIH issued an important notice effective May 25, 2021 ([NOT-OD-21-073](#)), updating their expectations for disclosure of Other Support. In addition to disclosing all research activity administered through Penn State, [Senior/Key Personnel](#) are also expected to disclose all resources made available to a researcher 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 Penn State or received external to Penn State. NIH interprets Other Support to include the following:

- ☐ **Paid or unpaid appointment(s) at another institution.** Please include all research collaboration(s) at another institution that directly benefit the investigator's research endeavors. Please also include any start-up funds provided by institutions other than PSU (amount currently available).
- ☐ **Financial support**, including, but not limited to, selection to a foreign "talents" or similar-type program, or other foreign or domestic support. This includes research performed outside of a faculty member's appointment (e.g., a faculty member with a 9-month appointment at Penn State and a two-month appointment at another institution performed during the summer).
- ☐ **Financial support for laboratory personnel.** Please include employees, post-docs, students, and visiting scholars who are paid a salary by their government or home institution. "If the time commitment or dollar value of the in-kind contribution is not readily ascertainable, the recipient must provide reasonable estimates."
- ☐ **In-kind contributions**, e.g., office/laboratory space, equipment, supplies, and other "high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology, etc.)."
- ☐ **Outside Activities such as consulting** where the researcher will be conducting research as part of the consulting activities. Private equity financing (e.g., in support of the SBIR/STTR program) and honoraria in support of an individual's research endeavors must be included.
- ☐ **Endowment(s), other PSU Unit/Department support, and retention funds** provided in support of an investigator's research (amount currently available).
- ☐ **PSU Seed/internal grant** (amount currently available).

Collaborations

Requirements: Report as Other Support collaborations with other scientists that directly benefit the reporter's research.

Considerations:

- Thresholds?
- Are all co-authors collaborators?

Tools:

- Caltech chart on collaborations:
[https://researchcompliance.caltech.edu/documents/19335/Collaboration Spectrum General-NIH ONLY FINAL.pdf](https://researchcompliance.caltech.edu/documents/19335/Collaboration%20Spectrum%20General-NIH%20ONLY%20FINAL.pdf)

Collaboration Spectrum



General Indicators	No shared resources (materials, facilities, equipment, or personnel), no direct or measurable benefit to my research, no collaborative experiments	Co-authorship/Acknowledgement (see below); shared resources, financial or in-kind, including unique or high-value materials, facilities, equipment, or personnel; resources that benefit my research; collaborative experiments.	NIH: Significant element of a project performed outside the US: experiments, human or animal research, extensive data analysis
COLLABORATOR	DOMESTIC OR FOREIGN	DOMESTIC OR FOREIGN	FOREIGN

Collaboration Spectrum

No Need to Report

Report Support

Report Support OR
Consider Foreign Component

General Indicators	No shared resources (materials, facilities, equipment, or personnel), no direct or measurable benefit to my research, no collaborative experiments	Co-authorship/Acknowledgement (see below); shared resources, financial or in-kind, including unique or high-value materials, facilities, equipment, or personnel; resources that benefit my research; collaborative experiments.	NIH: Significant element of a project performed outside the US: experiments, human or animal research, extensive data analysis
COLLABORATOR	DOMESTIC OR FOREIGN	DOMESTIC OR FOREIGN	FOREIGN
General Scientific Discussions	<ol style="list-style-type: none"> I had discussions with colleagues at a Conference Open discussions about research on Zoom/phone call I gave a research talk or seminar at another university 		
Sharing Resources	<ol style="list-style-type: none"> I received data, materials, reagents, etc. from my collaborator that <u>never</u> led to publishable results or an acknowledgment or authorship in a publication I received materials from my collaborator that were <u>not</u> "unique" or of high value. 	<ol style="list-style-type: none"> I received data, materials, reagents, results, etc. from the collaborator that <ul style="list-style-type: none"> benefits/benefited my research led to a publication where I gave co-authorship or acknowledgment to the collaborator My collaborator visited my lab to perform experiments My collaborator sponsors a postdoc or graduate student in my lab 	<ol style="list-style-type: none"> Unique materials, reagents, biological lines, etc. were created in a collaborator's foreign lab and provided to me for work on a federally funded project Experiments were performed in a collaborator's foreign lab, and data or results were provided to me in support of a federally funded project Human or animal subject studies were performed at a collaborator's foreign institution in support of a federally funded project

Publishing/ Presenting Together	<ol style="list-style-type: none"> Dr. X is a co-author on a paper with me or is acknowledged on a paper where I am an author; HOWEVER: <ul style="list-style-type: none"> I have never had a direct scientific exchange with Dr. X, and Dr. X's contribution to the paper did not overlap with my research reported in the paper (e.g., we didn't design or perform experiments, Dr. X didn't contribute to the data analysis of my data), and Dr. X's contribution to the paper did not benefit my research reported in the paper (See publication example, below) 	<ol style="list-style-type: none"> Dr. X is a co-author on a paper with me or is acknowledged on a paper where I am an author; AND <ul style="list-style-type: none"> Dr. X performed experiments in my lab, or Dr. X's contribution to the paper directly benefited my lab's research that is reported in the paper, or Dr. X contributed a key resource to my lab's research reported in the paper, or Dr. X performed extensive data analysis on my lab's research reported in the paper. 	<ol style="list-style-type: none"> Dr. X is a co-author on a paper with me or is acknowledged on a paper where I am an author; the paper reports research sponsored by a federal sponsor, AND <ul style="list-style-type: none"> Dr. X performed experiments in her foreign lab Dr. X's contribution to the paper directly benefited my lab's research that is reported in the paper Dr. X contributed a key resource to my lab's research reported in the paper Dr. X performed extensive data analysis on my lab's research reported in the paper
Working together on my research project where my collaborator is outside the US	<ol style="list-style-type: none"> Dr. Y is my former postdoc. He was not funded by any outside entity while at the University. We finished all experiments on a paper, wrote the paper, and submitted it before Dr. Y left to set up his lab outside the US. The paper was accepted with only minor edits. Dr. Y helped me finish those edits while outside the US. Dr. Z is a long-time colleague who is a professor outside of the US. We have monthly discussions about our research. I am a theorist, and Dr. Z is an experimentalist. We have not started or designed any experiments together. 	<ol style="list-style-type: none"> Dr. Y is my former postdoc who left the University 2 years ago to set up a lab outside the US. <ul style="list-style-type: none"> I will publish a paper that includes experiments conducted by Dr. Y when he was at The University. Dr. Y will not perform other experiments outside the US but will help with some data analysis and writing the paper. The federal funding used to support Dr. Y when he was in the lab is still ongoing. Dr. Z is a long-time colleague who is a professor outside of the US. We have monthly discussions about our research. I am a theorist, and Dr. Z is an experimentalist. Dr. Z sends a postdoc to my lab at the university to run the experiments. No experiments will be run outside the US. 	<ol style="list-style-type: none"> Dr. Y is my former postdoc who left The University a year ago to set up a lab outside the US. <ul style="list-style-type: none"> I will publish two papers with him, which include experiments conducted by Dr. Y when he was at the University. For the first, all of the initial experiments were conducted at The University, but the manuscript reviewers requested another experiment. Dr. Y will conduct the experiment in his lab. For the second, all of the experiments were conducted in the lab, but the manuscript reviewers have requested significant revisions to the paper, including extensive new data analysis. Dr. Y will perform the data analysis and edit the manuscript in the foreign country. The federal funding used to support Dr. Y when he was in the lab is still ongoing. Dr. Z is a long-time colleague who is a professor outside of the US. We have monthly discussions about our research. I am a theorist, and Dr. Z is an experimentalist. Dr. Z offers to set up and perform experiments in his lab in a foreign country.

Training and Communication

- Training for research administrators and faculty
- Keeping up with constantly changing requirements
- The advantage of training – NDAA FY 2021

Tools that Summarize Notice's Requirements

- University of Florida Table re. Where to Report Items – Other Support, Facilities & Resources, Budget
 - <https://research.ufl.edu/dsp/proposals/disclosing-activities-to-nih/other-support-frequently-asked-questions.html>
- University of Michigan Table re. Requirement Effective Dates
 - https://orsp.umich.edu/sites/default/files/implementation_of_not_od_21_073_changes_to_biosketch_and_other_support.pdf
- Caltech website
 - https://researchcompliance.caltech.edu/international_collaboration/federal-agency-requirements/nih_compliance

UF Resources

<https://research.ufl.edu/dsp/proposals/disclosing-activities-to-nih/other-support-frequently-asked-questions.html>

UNIVERSITY of FLORIDA

UFResearch

ABOUTRESEARCH LIFECYCLERESOURCESNEWS & FEATURESUF INNOVATE

Division of Sponsored Programs > Proposal Preparation & Submission > Disclosing Activities to NIH > Other Support FAQ

PROPOSALS

> Proposal Preparation & Submission

> UFIRST

> Institutional Frequently Used Facts

> Proposal Review

> Budgeting

> Clinical Trials

> Principal Investigator Eligibility

> Proposal Deadline Policy

> Proposal Policy Deadline FAQ

> Proposal Electronic Systems

> Pre-Proposals, Letters of Intent & White Papers

> Disclosing Activities to NIH

> Disclosing Activities to NSF

> Disclosing Activities to Other Agencies

> Forms & Templates

Other Support

Frequently Asked Questions (FAQs):

Other Support FAQs

1. Is “current & pending support” the same as “other support”?

Yes, “other support” is sometimes referred to as “current and pending support” or “active and pending support”.

2. What do I do if I am not sure whether to disclose something in my other support?

If you are unsure, contact DSP at ufproposals@ufl.edu.

3. If I am submitting a RPPR on or after May 25th, do I have to update my other support?

Yes, because of the substantial changes and additional information that needs to be included, every key person will need to submit updated other support with their RPPR.

4. Who is required to provide other support?

All senior/key personnel. NIH defines senior/key personnel as all 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. Pay close attention to specific solicitation instructions for when others might be required to provide an other support document (i.e. mentor on K award).

5. What should be included in the other support document?

All financial and in-kind support for any research that UF key personnel perform whether that is performed as part of their UF appointment, an outside activity, as consulting or as part of any other appointment or access they have.

6. Is other support required at the proposal stage when submitting an application to NIH?

It depends. Most research project applications do not require other support at the time of proposal. However, some Funding Opportunity Announcement (FOA)s (including K awards) require other support at the time of proposal. If you are unsure, contact DSP at ufproposals@ufl.edu.

Person, Equipment, Samples, Materials, etc.	Facilities & Resources	Other Support	Budget
Access to but not needed on this project		X	
Used on this project but not charged to this project	X		
Access to Core facilities or shared equipment	X		
Budgeted to charge to this project			X

UF webpage on [Disclosing Activities to NIH](#)

NIH webpage on [Other Support](#)

NIH [FAQs](#)

U. Michigan Resources

https://orsp.umich.edu/sites/default/files/implementation_of_not_od_21_073_changes_to_biosketch_and_other_support.pdf

Implementation of NOT-OD- 21-073 Changes to Biosketch and Other Support (as of May 18, 2021)			
Biosketch Changes		Effective May 25, 2021	Effective Jan. 25, 2022
	Use SciENcv to generate Biosketch	Not required but available for use	Not required (for now?)
	Follow format and provide requested information per NIH guidance in effect prior to release of NOT-OD-21-073	Required	Not allowed
	Follow new format and provide requested information per NIH guidance in NOT-OD-21-073	Not required but templates available	Required
	Add scientific appointments, paid and unpaid	Required	Required
	List positions, appointments, honors in reverse chronological order	Required	Required
	Highlight research projects within last 3 years in Section A. Personal Statement	Not required	Not required
	D. Research Support “removed”	N/A	N/A
Other Support Changes		Effective May 25, 2021	Effective Jan. 25, 2022
	Disclose all sources of Other Support and related information, including outside activities (e.g. consulting, visiting professorships) if conducting research, In-Kind support, and gifts if donor expects anything in return (e.g. time, services, research).	Required	Required
	Use SciENcv to generate Other Support	Not required (optional when available this fall)	Not required (for now?)
	Follow new format	Not required (templates available)	Required
	Separate sections for Project/Proposal Support and In-Kind	Not required	Required
	Completed Support for the last 3 years	Not required	Required
	Submit copies of agreements for investigator’s foreign appointment/ employment if listed as Other Support (translated and redacted as necessary)	Not required	Required
	When requested, submit copies of agreements for investigator’s foreign appointment/ employment if listed as Other Support (translated and redacted as necessary)	Required	Required
	Each senior/key person electronically signs PDF of their Other Support	Not required	Required
	If Other Support signed, flatten PDF prior to submission	Required	Required
	Submit updated Other Support immediately upon learning a source of Other Support for an active NIH grant was not disclosed	Required	Required

Caltech Website:

https://researchcompliance.caltech.edu/international_collaboration/federal-agency-requirements/nih_compliance

- Caltech Guidance for investigators by agency
- Tools to aid investigators in deciding what, when and where to disclose
- Recent Notices
- Training and FAQ

NIH Compliance

INTERNATIONAL COLLABORATION

UPDATED JUNE 6, 2021

Who Can Help

Transparency in Research: Federal Agency Disclosure Requirements

NIH Compliance

NSF Compliance

DOD Compliance

DOE Compliance

NASA Compliance

Frequently Asked Questions

Contact Us:

Office of Research Compliance

PDF of NIH Checklist >

PDF of NIH RPPR Checklist >

Complying with National Institutes of Health Policy

May 17, 2021: PIs have asked for more guidance on reporting research collaborators as NIH Other Support. Please review the [Caltech guidance on when to report to the NIH](#), which includes several examples.

May 11, 2021: In response to concerns raised by the academic community, NIH is deferring implementation of its new Other Support and Biosketch formats and the other new requirements imposed in Notice [NOT-OD-21-073](#) which was issued on March 12. The changes will now **go into effect on January 25, 2022** instead of May 25, 2021.

You still must disclose *all* Other Support as described in that Notice and in Notice [NOT-OD-19-114](#) in your just-in-time submissions and RPPRs. And you should contact OGC if you have any previously undisclosed other support.

For more details, please see the memo regarding the [Update on NIH Requirements from the Vice Provost](#).

April 28, 2021: NIH issued a follow-up [Notice: NOT-OD-21-110](#) regarding the May 25th deadline for reporting Other Support and biographical information on the Biosketch.

March 12, 2021: NIH issued [Notice No. NOT-OD-21-073](#), which announced updated application forms and instructions intended to further promote transparency and full disclosure of all resources (both domestic and foreign) that directly support the individual's research endeavors. All proposal applications and Just-In-Time requests either submitted or with due dates on or after May 25, 2021, must comply with these new requirements.

Please review [Notice No. NOT-OD-21-073](#), along with NIH's revised Biosketch [Instructions](#) and [FAQs](#) and Other Support [Instructions](#) and [FAQs](#).

The information below is intended to guide users to complete the NIH Other Support, Biosketches, and Foreign Component information.

Grant Applications

Just-In-Time Submissions

Progress Report

Agency Communications

Complying with NIH Policy when Completing Grant Applications

Other Support, Biosketches and Facilities, Equipment and Other Resources

Other Support and Biosketches must be provided for all senior/key personnel and faculty associates. The term "senior/key personnel" includes:

(Co)Principal Investigator(s) - the individual(s) designated by the grantee and approved by NIH who will be responsible for the project's scientific or technical direction. If more than one, the first one listed will have primary responsibility for the project and the submission of reports.

Frequently Asked Questions

INTERNATIONAL COLLABORATION

UPDATED APRIL 15, 2021

Who Can Help

Transparency in Research: Federal
Agency Disclosure Requirements

Frequently Asked Questions

Below are answers to frequently asked questions. These will be added to as questions are submitted. If you have any other questions, please contact caltechcoi@caltech.edu.



Disclosure Foreign Engagements and Research Activities




Biosketch Information

Federal Agency FAQs related to foreign components:




NIH FAQs on Biosketches



NIH FAQs on Other Support & Foreign
Components



NIH FAQs on Current & Pending
Support



NSF FAQs on SciENCv



NSF FAQs on Proposal Preparation &
Award Administration



DOE FAQs on Foreign Government
Sponsored Activities

Additional Tools

Disclosure Tools for collecting Other Support and Biosketch Information

- Leveraging existing COI systems: Caltech
- Novel systems: Stanford External Activities Questionnaire
 - https://ora.stanford.edu/sites/g/files/sbiybj10141/f/sample_eaq.pdf

Caltech's Biosketch/Other Support Question

- COI/COC system redesigned to collect information regarding commitments and financial interests on an entity by entity basis
- All commitments disclosed will populate a page that can be shared with grant management personnel (Biosketch Information)
- For each entity, PI's are asked if the entity provided other support (financial or in-kind). If yes, the information will populate a page that can be shared with grant management personnel (Other Support)

Caltech Biosketch/Other Support:

Caltech

Disclosure

Previous Question

Question 1

Question 2

Question 3

Question 4

Question 5

Save

Next Question

Q4. Biosketch and Other Support

This section provides you with a list of entities disclosed that could be included in your biosketch or other support for federal awards. You will be given an option to share this list with a grants manager or other Caltech personnel.

Would you like the list of the entities you disclosed to be available to your grant manager or other administrative personnel to help you complete your Biosketch/SciENCv, or Other Support for Federal Sponsor Proposals or Annual Reports? No financial interest information will be disclosed to your designee.

☐ YES ☐ NO

Here is a list of your entities that may belong in your biosketch.

Entity ↑	Country	Title	Time Committed	Type Of Commitment
Entity 1	Bulgaria	-	-	I have an academic or research appointment at this entity
Entity 2	United States	-	-	I have an academic or research appointment at this entity

1 - 2

Do you have any academic or research appointments (including honorary) not included here?
If yes, choose "Add Entity to Disclosure" and it will return you to your disclosure to add another commitment.

Add Entity to Disclosure

If there are undisclosed commitments/appointments, researcher is prompted to add to their disclosure

Here is a list of your disclosed entities that may be providing [Other Support](#) directly to you.

Entity ↑	Country	Title	Description	Time Committed	Value
Entity 1	Bulgaria	-	Entity 1 provided me with a unique mouse strain.	-	\$2000.00

1 - 1

Do you have any possible other support from entities not included here?
If yes, would you like to add the missing entities?

If yes, click the button below to add entity/description/country.

Add Other Support

Researcher Can Add Additional Other Support
Eventually, the Other Support will also include:

- Caltech Grants/Contracts/Gifts
- Visitor/Postdoc Other Support

Other Support

Stanford's External Activities Questionnaire (EAQ)

- 7 general questions designed to guide researchers to report details about their outside activities to meet new federal disclosure requirements
- all resources available for their research, no matter who is providing those resources (e.g., awards to perform research outside of Stanford)
- all appointments and affiliations with entities other than Stanford
- all "in-kind" research support, such as support for visiting researchers, space, equipment, "high-value" research materials (e.g., certain data sets or other materials)
- Connecting the dots:
 - Names (only) of outside entities from COI system are listed in the EAQ
 - Certain responses in EAQ will trigger a new disclosure in COI system
 - PI or Department Administrators can trigger an update of EAQ at any time

Stanford EAQ High Level View

≡

Stanford | EAQ

Home

1 Visitors

2 Postdocs & Students

3 In-Kind Resources

4 Affiliations & Appointments

5 Outside Research Roles

6 Outside Programs & Activities

7 Financial Interest

Review & Complete

Response Summary – Click to Complete Questionnaire below

1. Do you have any **visiting postdoctoral fellows, visiting students, or visiting scholars** involved in research in your lab who are paid directly, in full or in part, by any non-Stanford organization, institution, company or government ("Entity")?

Yes

No

Additional Comments:

2. Do you have any Stanford registered postdoctoral fellows or students involved in research for your lab supported in full or in part by **any non-Stanford** organization, institution, company, or government ("Entity") including fellowships?

Yes

No

Additional Comments:

3. Do you have access to **"in-kind" resources in support of your research endeavors** that are obtained through a collaboration, appointment, or relationship with an outside institution,

Yes

No

COGR
Council On Governmental Relations

Stanford EAQ – Question Level View

- Answering “yes” to a question returns names of the active entities in COI system; others entities can be added
- EAQ collects details that enable administrators and PIs to complete federal forms

Visitors

Do you have any **visiting postdoctoral fellows, visiting students, or visiting scholars** involved in research in your lab who are paid directly, in full or in part, by any non-Stanford organization, institution, company or government ("Entity")? *

☒ Yes ☐ No

Select and/or add all Entities providing support. (See examples.) ☐ Active entities from your OPACS record appear by default. Check this box to show inactive entities from your OPACS record (Inactive entities Selected below will remain Selected when box is unchecked)

Rows 50

Select	Entity	OPACS Status	Written Agreement *	Visitor(s) supported by this Entity *	Work on your federally funded projects *	Additional Information	Completion Status
<input type="checkbox"/>	- AbCellera Biologics Inc.	ACTIVE	-	-	-	-	-
<input type="checkbox"/>	- Bluestar Genomics	ACTIVE	-	-	-	-	-