Commitment Transparency

Michelle Bulls: Welcome to Commitment Transparency from the Office of Policy for Extramural Research Administration. I'm Michelle Bulls. I serve as the director of the Office of Policy for Extramural Research Administration. I'm joined here with my colleague Kristin Ta. Kristin.

Kristin Ta: I'm Kristin Ta. I'm a senior advisor also in OPERA, in the Office of Extramural Research at NIH.

Michelle Bulls: We're really excited to be here with you guys today. We know that this is a topic that you guys are very interested in, and we're really excited to share some of the new information that we have available to you, but before we get started, just some housekeeping items. We are asking that folks place your questions in the Q and A and not in the chat box because we'd like to have those questions consolidated in the Q and A space and not in the chat box or in different areas. So if you could do that for us, we'd really appreciate it. We want to make sure that we answer those questions that we know you're going to have. The other thing that we wanted to highlight is we have about 25 slides, not including transition slides, and so what I want to make sure of is that you all have the opportunity to ask the questions that you want to ask and we have the time to address them. So if you will, we will plow through the presentation. We're very familiar with all of the content therein, so if in fact you have questions that you want to ask in between, jot them down, and we will definitely answer them at the end of the presentation. We think it probably will take about 20 minutes if I don't talk too much, Kristin, to get through the presentation, and then we think we'll have about 25 minutes with you guys to do Q and A. So if I start going on and on and on, you guys need to send some chats to Kristin or someone saying, "Stop her because she's going over time." So with that in mind, let's get started with the presentation. So we're going to give you an overview, just a background on the commitment transparency efforts across government, and it's very much in the research platform space, what's not changing at NIH and of course what is going to be changing, overviews of the updates for the biosketch and the other support. We'll go through timelines and next steps, and then of course discussion and questions, which I know you guys will really enjoy. So moving ahead, one of the things that we want to make sure of as we're moving into commitment of transparency is that our recipients and our researchers understand that transparency and reporting of all research activities, domestic and foreign, is critical. Why? Because the failure to disclose these could end up in a few areas: diversion of IP, conflicts of interest, external appointments that we don't know about, and the potential impacts can be rippling, loss of public trust, distorted decisions, peer review decisions, actually funding projects that we would not have normally funded had we known the information. So the need for us to have the information as soon as it's available is extremely important, and the need for us to provide protection to our recipient institutions in terms of audit is extremely important. So the need for researchers to report and report timely is of the essence. What we have is what we call JCORE. It's the Joint Committee on Research Environments, and in May, 2019, and finally in June, 2020, we had a final report from our National Science and Technology Council, NSTC, that aligned our JCORE issues in the research environment to outline some of the integrity and safety issues that we'd been facing. One of the main core principles of JCORE's subcommittee on research brings together research agencies, and we've been really excited about some of the work that we've done with many of the different agencies to include DOE, NSF, DOD just coming together, talking about the various guidance that we'll be providing out of the JCORE, developing best practices so that agencies across the research platform are very consistent in how we approach universities and research institutions as well as truly developing education and outreach opportunities for our recipients and applicants to give examples on what the risks and potential negative impacts are when disclosures are not provided. The JCORE guidance outlined, as I said earlier, the failure to disclose financial conflicts of interest, commitment conflicts, as well as external employment arrangements, what we call appointments, and we also have shadow labs and other parallel research activities that are taking place in foreign entities or foreign institutions where we have not been made aware or given the approval for such activity to happen. The diversion of intellectual property is extremely critical as well as many peer review violations that end our researchers up on the do not use list. So how is this going to impact NIH? What have we seen? What has our leadership seen? And I have to say that from an NIH perspective, our NIH leadership from Dr. Collins to Dr. Tabak to Dr. Lauer, we've been extremely honored to have our leadership very much in the forefront trying to understand and trying to relay the importance of having these disclosures reported and reported timely. What we've seen as a result of some of the conversations that we've had with law enforcement agencies and others is that there are at least 201 scientists and counting, 90 plus institutions and many in the fields of biomedical research, denials on a consistent basis in terms of why or when the documentation was not provided and the, frankly, excuses of, "I allowed my colleague to use my name as a PI. I knew nothing about the grant. I didn't actually do the work, and the affiliations in the published paper, they were an error." And these are the consistent discussions that we're having with various institutions, and we know that our institutions are very committed to making certain that whatever information they have is provided, but frankly, the kinds of discussions that we've had that have outlined here with the denials have been very hard for us to move forward, and when we've heard these excuses, we've had to take significant actions as a result. So what are the myths? What's really not changing? Financial conflict of interest is one. There's nothing that's changing in financial conflict of interest, and there's nothing changing in the foreign components space. Identifying foreign components will consistently require prior approval. There are key measures for identifying these components. We've outlined them in the NIH Grants Policy Statement, and we've tried to outline them here in a layman's terms as a portion of the project being conducted outside of the US. If it's no, it's not a foreign component, no matter what. Yes: Are the activities being conducted outside the US significant? These are factors. The indicators include whether or not the collaborations with the investigators at a foreign site are going to result in coauthorship. Use of facilities and instrumentation at a foreign site as well as recipient of financial support or resources from a foreign entity. Regardless of what, we always ask that if you don't know or you're unsure as an entity that you contact either your grants management official, your program official and of course OPERA to determine whether or not we can assist you in making the assessments and coming up with a way forward. Once those assessments are clearly made, we want to make sure that prior approval takes place if in fact the application was not peer reviewed with a foreign component. That is something that many of our institutions have been asking about, has prior approval changed? No, it has not, and so we want to make sure that we do that, and we do that timely. Financial conflict of interest has not changed. It's still found in 42 CFR Part 50, Subpart F. I laugh at many of my colleagues across the federal research platform. We have many requirements that they don't have, but we also want to make sure that the Subpart F and Part 50 is adhered to from our research recipients that obtain NIH funding. The requirements include financial interest received from a foreign entity, separate and distinct from other support and foreign components. This is not to be mutually exclusive because we do know that some of the other support that we will obtain, both foreign and domestic, will help inform areas of financial conflict of interest, but we want to make sure that they are reported separately, and that is the distinction. So what is changing? Our approach. What we've tried to do is clarify in our policy statement as well as updating our forms and instructions as we promised you we would do for over a year now, right, Kristin? And so we're utilizing that JCORE guidance that many of our research federal partners are using, and we've collaborated with all of our research federal partners through JCORE subcommittees, and the outcomes of those discussions have been really critical. We've outlined them here, and you'll see them in the forms as Kristin goes through them, but mainly what we've tried to do is provide details on what we expect to receive from our recipients on in-kind contributions. We've made it clear what a gift is and what it's not. We've also updated our application forms and instructions for our biosketch and other support as well as updated the form and format data collections in collaboration with NSF as well as some of our other federal research partners to reduce applicant burden, meaning applicant and recipient burden, when we are talking about collecting appointments on biosketch or we are talking about collecting in-kind contributions, we want to make sure that the language and the terminology is similar, and although we might not be collecting them in the same way or in the same space, we are collecting them using the same terminology, looking forward to collecting them in that SciENcv, right, where we can have that structured data, but we'll talk about that a little later.

Kristin Ta: All right. So now we're going to go through the changes in a bit more detail, and I see lots of little questions popping up in the Q and A, so hopefully we'll address some of those as we go through this, and then we can take questions when we wrap up. So to start off with the biosketch. So as Michelle mentioned, we've kind of attempted to clarify things in the policy statement. So biosketch has been a longstanding NIH policy, the submission of the biosketch, but when we wanted to do our analysis, we realized that currently the biosketch requirements are kind of spread out throughout the Grant's Policy Statement. So what we'll be doing in our next policy statement update is including a new subsection that brings all those biosketch requirements together. So we're not changing any requirements about submission of the biosketch. We're just making sure that it's all in one place for easy reference for everyone who needs to submit one, and then in terms of the actual forms, to align with the JCORE guidance that Michelle was talking about earlier and to minimize the duplication of other support information that comes in later or Just-in-Time, we're making some changes to the biosketch form itself. So the first change is in Section B where it currently requests your positions and honors. So we're expanding that a little bit to clarify that we really need information on all scientific appointments, and that includes foreign and domestic whether you're receiving monetary compensation or not. So all of that information will be provided in Section B. In addition, during our analysis of other support, we realized that the research support information is really just a less detailed version of the other support that you're going to be submitting Just-in-Time. So to simplify things and reduce burden, we're removing the research support portion of Section D from the biosketch, and for those who are fellows or work with fellows, this scholastic performance piece of Section D is not going away. It's just the research support, and I know that some folks are concerned that, "Oh, well reviewers and others might need to see the information that's in research support," but we're looking through the other sections of the biosketch, such as your contributions to science and your experience, discussions in your personal statement, and we'll make sure that anything that reviewers and ICs need will be captured in those other areas, so you're not going to lose anything by losing that research support piece.

Michelle Bulls: Right.

Kristin Ta: Okay, and just to give you an idea of what it's look like, this is a mock up, and we are working with SciENcv to make sure that the templates there get updated as well. So you can see here on the right where we've added scientific appointments and removed that Section D piece. And then for fellows, the Section D research support is gone, but the scholastic performance, as I mentioned, will still be there. So that's the biosketch, and now we're going to talk a little bit more about other support, and so I want to start off, because I know what got this question a few times in the NIH update yesterday, the timing for submitting your other support is not changing. It's still going to be coming in as part of your Just-in-Time package. So I just want to start off by clarifying that. In terms of updates that we're making to the Grants Policy Statement, again, these are not policy updates, but we've gotten a lot of questions over the past year, so we wanted to clarify a few things to make sure everybody has clear information. So those clarifications include the definition of a gift, which is a resource that's provided when there is no expectation of receiving anything in return. A lot of entities will give awards that they call a gift, but in reality it's not a gift, so we want to make sure that that definition is clear. And we've also clarified the expectations for reporting in-kind contributions, such as office or lab space equipment, supplies, staff in your lab that might be supported by another institution, and we're including some examples of those in the Grants Policy Statement as well. And for things that don't have a time commitment or dollar value tied to them, we're asking for reasonable estimates to be provided as part of your other support. And we've also made some additional clarifications regarding reporting on foreign resources. So in terms of the review the IC staff do of other support, we're clarifying that part of that review will include, as Michelle mentioned earlier, just a check to confirm that none of the things being reported as other support might actually meet the definition of a foreign component so that we can make sure that prior approval is obtained if necessary. In addition for foreign appointments or when your senior key personnel has employment with a foreign institution, we'll be asking that a copy of those contracts be provided as supporting documentation for the information that you're including in your other support information. So it's simply meant to support the statement that you're making in your other support regarding time commitments and funding that's being provided. And then as always, recipients will continue to report on significant changes each year in their RPPR by providing other updated support, but we will be clarifying that if midyear a senior key personnel gets a new appointment or an affiliation that's a significant new change, that should be reported when it happens rather than waiting for the next RPPR just so that NIH has the most up to date information about that individual's research support. So let's talk a little bit about the forms. So as you know, our current format page is really just that, kind of a format page. We lay out the information we need, and then you just kind of duplicate it as needed to fill it in, but one of the things we're really hoping to gather in the future is more structured data on other support. So we've really developed a more structured form that will start out as a fillable PDF, but hopefully in the future, we're working with SciENcv to get that into SciENcv as well so that we can actually be pulling it into our ERA systems, but that's coming a little bit further down the line. So what is that going to look like? Here is a mock up, and this is just a mock up. It's not completely final that we're working on getting that done as quickly as we can, and so you'll see here on the left we have projects and proposals. The data elements are similar to what's already requested. It's just being laid out in a more formatted way so that we get that information better organized. We've also added a separate section for summary of in-kind contributions. So rather than trying to have people fit their in-kind support into the formatting of a regular project or proposal, we've created a separate section for those. It has some slightly different elements to provide. And then as always you'll provide your overlap, and you probably noticed that this form looks a lot like the form that NSF is using. We worked really closely with them to try to reduce the burden as much as we can. So the elements, as much as possible, are the same across the two forms to reduce the amount of rework that you have to do to submit these.

Michelle Bulls: And I think that's important, Kristin, and just to highlight the reason why that's important is because we've heard you guys for a long time saying, "Could you please just have your forms similar so that when you all implement your system requirements, it looks the same, feels the same." And so NSF and NIH did hear you, and I feel like this is a huge win for us and our recipient community.

Kristin Ta: Absolutely, and as we move toward SciENcv, when you're pulling your information straight from SciENcv, it's going to get even easier, so we're really excited about that.

Michelle Bulls: Yes.

Kristin Ta: Okay, and then along with that updated form, we've developed a new instructions page that provides a lot more detailed information on how to complete the form. It includes all the definitions and terms that we have in the policy and provides detailed instructions on how to complete the different data elements. So timeline, which I'm guessing is what some of these 53 questions in the Q and A are about. So the estimated timeline that we're working toward is to officially announce and provide the forms to the public some time in November, and that will include posting the new forms and instruction, and in order to give everyone time to make updates to systems that they might need to at their institutions to begin to understand that new form and complete it, we won't be actually requiring the use of the updated forms until early 2021, likely in January. And as I mentioned before, we're working closely with SciENcv to integrate that other support template into SciENcv as well, and we will definitely have the updated biosketch templates in SciENcv ready when it's time for these new forms to begin being used.

Michelle Bulls: Yeah, those are good. That's good because I will say as Kristin has outlined with us working with the JCORE subcommittee and cochairing in the CAR and JCORE subcommittee, NIH really does have a responsibility and commitment to making sure that these pieces are implemented, and they're implemented timely, but I will say that the November, 2020 Guide notice for policy informed a large reason why we really need to roll that out at that time is because that's dovetailing with our Title II requirements and having to implement our Title II regulations by November 12th, 2020. So while it seems like a very low-hanging, expedited timeline, we don't have a lot of choice in that because the policy statement has to go out and align with our Title II regulations. How does that impact our other support disclosures? Probably not as much as it does other things, but I do think that us putting our policy statement out in alignment with the requirements from OMB and HHS for the implementation of Title II is critically important. So to Kristin's point, we will have more updates in terms of SciENcv later in 2021. We've entered into discussions with our colleagues at NSF and SciENcv. They're really excited and we are as well, alongside of working with our colleagues at NSF to make sure that whatever we implement is something that other research agencies can leverage and will be beneficial to our recipients as you guys report, and we can have that plug-and-play and interoperability for us to use the information you're providing to them and then to us. With that, I think we can ... Do we have another slide, Kristin?

Kristin Ta: I think that's it, and I just want to add for anyone who may have heard Michelle and just thought, "What is Title II?" I'd recommend you check out the next session where Michelle and I will be talking about the Title II implementation. So let me go ahead and take down the slides and pull up our Q and A. We have lots of Q and A.

Michelle Bulls: Seventy-four.

Kristin Ta: So the first one is easy. "Will slides be available after the presentation?" And the answer to that is yes. I'll be sending them forward as soon as we're done so that you can have them for your reference. Okay. So let's take a look at the first one. "Can you give some examples of the types of consulting arrangements that should be listed on an other support page?"

Michelle Bulls: So let's go into the other support page [Indistinct] because what we're asking for is other support. We're asking for resources, consultants, arrangements are typically not included in the other support pages, and so I'm not sure that that's where you would want to report consultant arrangements. You would want to highlight that there is a consultant that is participating in the grant, right? And then within the research strategy and other areas, you would talk about the ... And even in the budget you would capture the amount that would be diverted to the consultant, but consultants are not captured in other support nor are we requiring that as a change. So it should not be listed in the other support.

Kristin Ta: Yeah. And the next one we have kind of goes back to the foreign component discussion that we were having earlier. "So are all publications that were supported on part by NIH funds and foreign funds considered a foreign component and require after the fact prior approval?"

Michelle Bulls: So, let's see here. Are all publications that were supported in part considered foreign components? So let's go back to that slide.

Kristin Ta: Right, because there's a couple of questions that you're going to want to ask. So that first question, is a portion of the project being conducted outside of the United States? If the answer to that question is no, then you definitely do not have a foreign component. If the answer is yes and there is a collaboration where part of that project is actually being conducted in a foreign country and there's a collaboration where they're working together and that results in a publication, that would be a foreign component.

Michelle Bulls: Right, and that's where the prior approval, and I'm going to say that prior approval is not after the fact. Prior approval is prior to you engaging in that activity, and so it's really important for us to say that if you have questions about whether something is a foreign component that you contact the agency prior to entering into that arrangement because once you enter into that arrangement and it's considered a foreign component or something else and prior approval was not obtained, by default you've materially failed to meet the terms and conditions of the grant, and that's not where we want our recipients. When in doubt, always ask the question, and prior approval is not after the fact.

Kristin Ta: So along with that, we have a question that says, "Is it compulsory for every type of NIH program or request for applications to inform prior the presence of foreign components? What is the proper timing and channel to inform?" So I guess they're asking about when do they need to request that prior approval for a foreign component.

Michelle Bulls: As we're beginning to enter into these arrangements prior to signing the arrangements and you're working with your program official, it is extremely important for you to ask the question of whether or not prior approval is required. I do think that if there is an application that is coming in as a new application and there is a need to go into these critical measures, right, and the indicators, if there is a need for a foreign component at the time of the application of the competitive segment, then you would put that in the application. It would be reviewed and approved or not. At the time where the grant has been made and you become a recipient and you are hitting upon these key measures and indicators, then as you are moving into solidifying these arrangements there needs to be prior approval obtained. So there is not a need for you to do it right away. There's a need for there to be a planning stage of your moving into this. There's a need for outside ... Let me just move this real quick. There's a need for activities to be conducted outside of the US, and those activities are significant, and then there's a need for you to have these collaborations with investigators at a foreign site, and that could produce coauthorship and all the other key indicators. Once we understand that that is something that could possibly happen as you are solidifying those arrangements, then you need to come in for prior approval and, like I said, when in doubt always ask. The goal is to always be in a collaborative partnership with our recipients and not a, "A-ha, I got you." That's not the goal. That's not the intent. The intent is disclosure, integrity, honesty both ways.

Kristin Ta: The next one kind of touches on both foreign components and other support. "Can you comment on how to handle PIs fully employed by an NIH recipient US-based institution that choose to live in a foreign country? What obligations, if any, do we have to report the PI's physical location on the other support file?"

Michelle Bulls: You want to take this one, Kristin? You got it?

Kristin Ta: This is one we were actually discussing pretty recently. There was a scenario where this exact thing was happening, and so the distinction that needs to be made here, though, is this isn't other support. This is someone working at your institution who's performing that work outside of the United States. So this would need to come in, and you would need to consult with your IC in terms of what work this person is doing because it's a potential foreign component. This isn't really about their other support. This is about where the NIH research is being conducted.

Michelle Bulls: And if it's significant. I do know that the example that we received probably about a week and a half ago, right? That the individual was in a situation where they had to telework, and so that really is ... And it wasn't really a significant portion. It was that the individual was teleworking based on some family challenges with COVID, and that's totally understandable, but then it becomes a question of if the individual is long-term teleworking, and it's a key senior personnel, do you believe that this individual can do this for 90 days while things work out, or if this is a long-term arrangement where the individual may not be coming back, and we may need to either identify a foreign site or replacement of that senior key personnel, and those are decisions that the institution and recipient will have to make. NIH would talk you through that, but understandably we can't have someone that's in a senior key personnel away from the lab or from their domestic location for an extended period of time without us looking at the arrangement to determine how it will impact or not the place of performance and the project at hand.

Kristin Ta: And so the next one I'm just going to answer really quickly because I see it in here a few times. "Will the page limit on the biosketch remain at five?" Yes, it will. We're not planning on changing that page limit right now.

Michelle Bulls: I think that's an important question because people have been asking that, right? And we are not changing the page limitations. Actually, we're removing a section, though we might still have to identify where we will put some of those critical areas as we're moving into our new form space.

Kristin Ta: Okay. This next one is about in-kind support. "How will NIH view that in-kind support? I expect there will be concerns that such support will be considered a cost share. If that's not the expectation, will that be clearly stated in the policy statement?"

Michelle Bulls: You want to ... You want me to answer?

Kristin Ta: So the in-kind support and your other support is in-kind support for that researcher, but it's not necessarily in-kind support for that specific grant application. So it's different than a cost share. We're not going to be viewing it as a cost share for that application. I don't know if you want to expand on that.

Michelle Bulls: It's [Indistinct] cost share. It will be outlined. So we do talk about it in our funding opportunity announcement. If that project is looking for an administrative cost share, that needs to be stated up front, and if it's not stated up front, and there are other resources being used like lab space, a fellow, that's in-kind. That's the resources that is being devoted to that specific project or that specific investigator, and what we're saying is that if there is a specific resource that's being used, unique to the investigator, unique to that project, then we want you to tell us about it in your other support and then give us an estimate, a dollar amount that you can attach to that. That's just highlighting what amount of resources is being devoted to either uniquely that individual researcher or the project. If we have not asked for you to outline your cost sharing in the funding opportunity announcement and subsequently in your terms and conditions, then that would not be considered cautionary and you would not have to report it as such.

Kristin Ta: So here is a question about completed support. "So other support under Just-in-Time currently does not have completed support on it. Completed support on the biosketch shows reviewers that there has been funding in the past." And so one change, I don't know if you saw it in our mock up or if it's on this particular copy, you'll see that other support is going to be including some information on completed projects so that NIH staff can understand the projects that were completed and any impact they have on the NIH award, but as you mentioned when we talked earlier about the biosketch and removing the Section D research support, we are going to make sure that information on your previous work, previous projects that you've had are still captured in the biosketch in the other section so that that information on your expertise and why you're so qualified for this grant, it's still going to be there, and reviewers are still going to see it. It just won't be in that same Section D format.

Michelle Bulls: One of the things that we've heard, just to be frank, is that there is a need for this information because there is a dollar amount that's attached to it that kind of helps folks know how much was awarded and whether the researcher is qualified or eligible to receive the support that you're applying for, and there is not dollar amount that is attached. So what we've identified is that if that's going to be collected, it needs to be collected in the other support. Where that's really important is something that you said, Kristin, early on, and that is if the information is going to come in, like mentored K awards, if that's coming in with the application, it's still going to be received and reviewers will have access to it. So I think that that's some nuance. There may be some other areas that we need to consider, which is why I think you're making the point that if the information is needed it will be captured, but it won't be captured in the research support area. As we worked with NSF, and as we've heard from some of our recipients and applicants that was an area that they've always struggled with. NSF made the point of, why aren't we capturing this in other support, and is this information that you need at the outset? Well, as we're looking at it, we looked at what was captured under research support and believe that that information can be obtained under the other sections.

Kristin Ta: Yeah. Okay. We have about 5 minutes left. So one question I see popping up in here a lot is whether start-up funds provided to a PI by their institution need to be listed in their other support submission. The answer is no. Start-up funds from the applicant organization to a PI do not need to be listed. If they're receiving funds from another institution, such as a foreign entity or some other organization, that would be included in your other support.

Michelle Bulls: My thing is stuck, Kristin. I'm trying to get ... Sorry.

Kristin Ta: No problem. I also see a couple folks asking about total cost versus direct cost, and I have the mock up so that you can see exactly what we're asking for.

Michelle Bulls: [Indistinct] I think folks asked that question yesterday in our update.

Kristin Ta: Mm-hmm. So it is the total award amount.

Michelle Bulls: But we did talk about yesterday, Kristin, and I want to make this distinction, right? So folks are saying, "Well, you said it was for annual." But really it's for the total, but it's total by budget period. So it captures everything, but you see it individual budget periods. Okay.

Kristin Ta: Looks like we've gotten to a lot of it. So what is SciENcv where other support will eventually be pulled from? Someone is asking about that. Do you want to touch on that, Michelle?

Michelle Bulls: SciENcv is where all of the individual researchers capture their CV, their appointments and all of their contributions to research, and actually it's a lot of different things. I think it talks about not just what they're doing in the NIH space, but across their research portfolio, and it gives a lot of great information regarding faculty, and it's really a CV on steroids. What's happening in the federal world? What's happening in pharma? Any area of support or area that they have their research endeavors. So I think what happens there is that as they are putting in their information as to how they have made contributions, the beauty is that SciENcv allows other federal agencies to access each other's information, and so I talked about a little bit about the plug-and-play and the structured data. If we want to go in and see, how many awards across the federal spectrum does Dr. X have? We can go into SciENcv and pull that information in a way that's in structure and very comprehensive. So I encourage our recipients to ... I don't know if we have anything about SciENcv. Maybe we should do some sort of presentation from our systems policy branch working with NLM to highlight those features that are just extraordinary and allow us to see a researcher's portfolio from a very broad, amped up perspective. It's really neat.

Kristin Ta: That ... It looks like we are just about at time. I know we did not get anywhere near through all of these questions. I'm going to see if we can get them downloaded because we definitely want to use them for our FAQs that will be coming when we post the new forms and instructions, but I would encourage ...

Michelle Bulls: [Indistinct] talks about our foreign ... This jumped out at me. I just wanted to answer this question. Are foreign institutions now required to upload their FCOI policy and [Indistinct]? No. Again, what we talked about is that FCOI remains the same. So whatever the eligibility criteria and requirements were last year, the year before and the year before that, they remain the same. If you have questions about what is required in our FCOI policy, please look at the NIH grants policy statement. We also have an OER web page that highlights the requirements as well. Also we have an FCOI inbox that you can contact, and of course you can contact me and/or Kristin directly along with our expert in residence Diane Dean.

Kristin Ta: And I believe Diane recorded an on-demand presentation for this seminar that you can find specific to FCOI as well. And so that brings us to time. Like Michelle said, visit our booth. Send us an e-mail. We love getting your questions because it helps us make the policies and information we put out even better. So thanks, everyone, for coming today.

Michelle Bulls: Thank you.