NIH DEFINES A FOREIGN COMPONENT AS:

The existence of any “significant scientific element or segment of a project” outside of the United States, in other words:

1. performance of work by a researcher or recipient in a foreign location, whether or not NIH grant funds are expended and/or

2. performance of work by a researcher in a foreign location employed or paid for by a foreign organization, whether or not NIH grant funds are expended.

WHAT ARE SOME EXAMPLES OF A “SIGNIFICANT ELEMENT OF A PROJECT”?

- collaborations with investigators at a foreign site anticipated to result in co-authorship
- use of facilities or instrumentation at a foreign site
- receipt of financial support or resources from a foreign entity

PRIOR APPROVAL IS REQUIRED

Initial Disclosure: You must disclose in your grant proposal all foreign components.

Ongoing Grants: If you want to add a foreign component to an ongoing NIH grant, you must seek prior approval from NIH.

- Do not allow the performance of work by a researcher or recipient at a foreign institution BEFORE you seek and receive prior approval from NIH.

REFERENCES

NIH https://grants.nih.gov/grants/faq-other-support-foreign-components.htm#B
Campus Research Compliance Offices https://www.ucop.edu/ethics-compliance-audit-services/compliance/research-compliance/campus-programs.html