ETHICS COMPLIANCE AND AUDIT SERVICES

NATIONAL INSTITUTES OF HEALTH **GRANT DISCLOSURE REQUIREMENTS AN OVERVIEW FOR UNIVERSITY OF CALIFORNIA FACULTY**

EOREGN COMPONENT

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 significant work that is part of an NIH project by a researcher or recipient in a foreign location, whether or not NIH grant funds are expended and/or

2. performance of significant work that is part of an NIH project 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.

RFFFRFNCES

NIH https://grants.nih.gov/grants/faq-other-support-foreign-components.htm#B

Campus Research Compliance Offices https://www.ucop.edu/ethics-compliance-auditservices/compliance/research-compliance/campus-programs.html