

Update on NIH policy on Foreign Involvement: January 17, 2019

NIH has recently provided clarification of their foreign collaboration policies as follows:

I. Foreign Other Support must be disclosed to NIH in advance, by including it in the Just-in-Time Other Support submission on a new or renewal award, or updated in the annual RPPR, or submitted by letter to the awarding office and thereafter included in the RPPR. For example, “Visiting scientist, name, degree, role on project, supported by institution, country, for the period of __/__/____ to __/__/____.”

II. Foreign Involvement, requiring NIH Prior Approval, only applies to NIH work scope performed in a foreign location, either funded by the NIH grant or by other sources, domestic or foreign. Continued collaboration (e.g., research data generation, data analysis, etc.) by a foreign supported scientist or student, who had previously been visiting the grantee institution and reported as Other Support, upon their return to their foreign home institution, would require NIH prior approval for foreign involvement.

III. Foreign personal payments received by a funded investigator, including, stipends and honorariums, must be disclosed to JHU via eDisclose and evaluated by the institution for COI under the PHS regulations and JHU policies. Additionally, sponsored or reimbursed travel must be disclosed when the value received from a single foreign entity reaches or exceeds \$5,000 during a twelve month period.