

## International Research Activity Guidance

If you...	You should...	Contact / Resource
...plan to include a <b>foreign component</b> in an NIH research proposal	...obtain prior approval from NIH by submitting a <i>Foreign Justification</i> document with the grant application.	<p>Your <a href="#">unit's Research Administrator (RA)</a> or the <a href="#">ORSP Project Representative</a></p> <p><a href="#">Research Application Instructions for NIH and Other PHS Agencies</a></p> <p><a href="#">NIH and Other PHS Agency Research Performance Progress Report (RPPR) Instructional Guide</a></p> <p><a href="#">NOT-OD-19-114: Reminders of NIH Policies on Other Support...</a></p> <p><a href="#">NIH FAQs: Other Support and Foreign Components</a></p>
...have an <b>approved foreign component</b> in an NIH-funded project	...include a <i>Description of Foreign Component</i> in the annual progress report (RPPR).	
...need to <b>add/amend a foreign component</b> to an awarded research project	...use the "Request Action / Modification" activity in the eResearch Proposal Management (eRPM) system to upload a <i>Description of Foreign Component</i> for ORSP to submit to the sponsor for approval.	
...have <b>applied for</b> or been <b>provided funding</b> from a foreign institution that has routed through ORSP as a U-M project	...list the funding on <i>Current and Pending Support/Other Support</i> .	
...have <b>applied for</b> or been <b>provided funding</b> from a foreign institution <b>AND</b> that funding <b>has not</b> routed through ORSP as a U-M project)	...list the funding on <i>Current and Pending Support/Other Support</i> . ...disclose the funding as an outside interest in M-Inform.	
...have access to <b>resources</b> (e.g., office/lab space, research materials, equipment, staff) at a foreign institution	...list the non-financial support on <i>Current and Pending Support/Other Support</i> .	
...want to work with <b>visiting personnel</b> who are supported by a foreign entity	...list the personnel on <i>Current and Pending Support/Other Support</i> . ...obtain prior approval from the NIH <i>if</i> the personnel will continue to work on an NIH-sponsored project outside of the U.S. after they leave U-M. If approved, report the foreign component on the RPPR.	
...want to collaborate on an NIH-sponsored project with an individual who is <b>temporarily working outside the U.S.</b>	...obtain prior approval from the NIH for a foreign component. ...report the approved foreign component in the RPPR.	
...have been invited to participate or are currently participating in a <b>foreign talent recruitment program</b>	.....list your relationship with the talent recruitment program on <i>Current and Pending Support/Other Support</i> . ...disclose the participation as an outside interest in M-Inform.	Some U.S. agencies (e.g., Department of Energy) require prior approval of participation for the research funded by that agency.

If you...	You should...	Contact / Resource
...have an <b>active or proposed position or affiliation</b> (paid, unpaid, or honorary) with a foreign institution	<p>...list the position/affiliation in your biosketch.</p> <p>...list the position/affiliation on <i>Current and Pending Support/Other Support</i>, if it relates to your research or expertise.</p> <p>...disclose the relationship, including your position/affiliation title, as an outside interest in M-Inform.</p>	Follow the sponsor's guidance on what information to include in a biosketch.
...have a paid or unpaid <b>consulting or advisor relationship</b> with a foreign entity	<p>...disclose the relationship as an outside interest in M-Inform.</p> <p>...list the relationship on <i>Current and Pending Support/Other Support</i>, if it relates to your research or expertise.</p>	<p>The <a href="#">U-M COI Offices</a> review outside interest disclosures to identify potential conflicts of interest in research activity.</p> <p>You are required to disclose the outside interests of your spouse, domestic partner, or dependent(s) if those interests relate to your <a href="#">institutional responsibilities</a>.</p>
...have been invited to be a <b>speaker or lecturer</b> (paid or unpaid) by a foreign entity	...disclose the relationship as an outside interest in M-Inform.	
...have an <b>ownership interest</b> in a foreign entity.	...disclose the relationship as an outside interest in M-Inform.	
...have received an <b>item of value</b> (e.g., phone from a technology company) from a foreign entity in connection with an activity related to your institutional responsibilities	...disclose the item of value as an outside interest in M-Inform.	
...have invented <b>intellectual property optioned, licensed, or marketed</b> by a foreign entity	<p>...have filed an invention disclosure with U-M Tech Transfer.</p> <p>...disclose the intellectual property (IP) as an outside interest in M-Inform.</p> <p>...list the associated technology on <i>Current and Pending Support/Other Support</i> if it is used in your research.</p>	<p><a href="#">U-M Tech Transfer</a> helps protect and license your intellectual property (IP).</p> <p>Work with U-M Tech Transfer to ensure that you do not enter into any agreement that is contrary to established IP rights.</p>
...have <b>travel expenses reimbursed directly to you</b> from a foreign entity, individual, or government	<p>...disclose the travel as an outside interest in M-Inform, as applicable with U-M/unit policy.</p> <p>...list the travel expenses on <i>Current and Pending Support/Other Support</i> if the travel relates to your research or expertise.</p>	Follow your school/college guidance on disclosing travel as described in M-Inform.

If you...	You should...	Contact / Resource
<p>...plan on <b>traveling internationally</b> on U-M business</p>	<p>...register the travel in the Faculty &amp; Staff Travel Registry.</p> <p>...contact the U-M Export Controls Office (ECO) to verify travel and/or equipment (e.g., computer) protection requirements.</p>	<p><a href="#">Global Michigan</a> provides infrastructure and support services for international travel and education.</p> <p>The <a href="#">Export Controls Office</a> assists you in obtaining federal licenses to travel to/from restricted locations and/or to take (i.e., export) certain technology with you on the trip.</p>
<p>...have been <b>offered a gift or donation</b> from a from a foreign entity, individual, or government.</p>	<p>...contact the Office of University Development (OUD).</p> <p>...<b>refrain</b> from signing any agreement accepting the gift/donation without first checking with OUD.</p>	<p>The <a href="#">Office of University Development</a> assist U-M units in developing and maintaining private support opportunities and relationships with foundations and corporations.</p>
<p>...have a foreign entity <b>propose an institutional partnership</b> with U-M</p>	<p>...contact Global Michigan to formalize any unfunded institutional relationships prior to beginning any engagement with the foreign entity.</p> <p>... <b>refrain</b> from signing any agreement that commits university resources without first checking with ORSP or U-M Office of Research (UMOR).</p>	<p>The central offices may conduct restricted party screening to ensure that no restricted entities or individuals are involved.</p> <p>For more information, see the <a href="#">Restricted Party Screening webpage</a>.</p>
<p>...want to <b>host at U-M a visiting scholar, student, tour group, or other individual</b> from a foreign entity or government</p>	<p>...request restricted party screening (RPS) of the individual(s) as part of the planning process to host the visitors.</p> <ul style="list-style-type: none"> <li>• Within the School of Engineering, contact the Dean's Office to request RPS.</li> <li>• Within all other U-M schools, colleges, units, or organizations contact the U-M Export Controls Office (ECO) to request RPS.</li> </ul>	<p>Restricted party screening ensures that no restricted entities or individuals are involved.</p> <p>For more information, see the <a href="#">Restricted Party Screening webpage</a>.</p> <p>Global Michigan offers <a href="#">guidelines and checklists</a> to develop a hosting event for international visitors.</p>
<p>...author a <b>publication</b> that acknowledges NIH support <b>AND</b> the publication has a <b>foreign co-author</b> or also acknowledges <b>support</b> from a foreign entity, individual, or government</p>	<p>...clarify in the publication whether work was performed outside the U.S. and, if so, ensure that NIH approval was obtained for the foreign component.</p>	<p>Publications that arise or result from NIH-supported research must comply with the acknowledgements and reporting requirements of the <a href="#">NIH Public Access Policy</a>.</p>
<p>...participate in an NIH <b>peer review</b> process</p>	<p>...refrain from sharing the peer review materials with unauthorized parties, including a foreign individual, entity, or government.</p>	<p>The <a href="#">Office of the Vice President and General Counsel</a> provides legal advice to U-M personnel as it relates to their U-M professional responsibilities.</p>