

International Research Activity Guidance for Federally-Sponsored Research

| If you... | You should... | Contact / Resource |
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| ...plan to include a foreign component in an NIH research proposal | ...obtain prior approval from NIH by submitting a <i>Foreign Justification</i> document with the grant application. | |
| ...have an approved foreign component in an NIH-funded project | ...include a <i>Description of Foreign Component</i> in the annual progress report (RPPR). | |
| ...need to add/amend a foreign component 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. | Your unit's Research Administrator (RA) or the ORSP Project Representative |
| ...have applied for or been provided funding 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> . | Research Application Instructions for NIH and Other PHS Agencies |
| ...have applied for or been provided funding from a foreign institution AND that funding has not 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. | NIH and Other PHS Agency Research Performance Progress Report (RPPR) Instructional Guide |
| ...have access to resources (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> . | NOT-OD-19-114: Reminders of NIH Policies on Other Support... |
| ...want to work with visiting personnel 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. | NIH FAQs: Other Support and Foreign Components |
| ...want to collaborate on an NIH-sponsored project with an individual who is temporarily working outside the U.S. | ...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 foreign talent recruitment program | ...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. |

University of Michigan
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 Office of Research/Vice President for Research

| If you... | You should... | Contact / Resource |
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| ...have an active or proposed position or affiliation (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 consulting or advisor relationship 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 U-M COI Offices 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 institutional responsibilities.</p> |
| ...have been invited to be a speaker or lecturer (paid or unpaid) by a foreign entity | ...disclose the relationship as an outside interest in M-Inform. | |
| ...have an ownership interest in a foreign entity | ...disclose the relationship as an outside interest in M-Inform. | |
| ...have a leadership or management role in a foreign entity | <p>...disclose the relationship as an outside interest in M-Inform.</p> <p>...list the role on <i>Current and Pending Support/Other Support</i>, if it relates to your research or expertise.</p> | |
| ...have received an item of value (e.g., phone from a technology company) from a foreign entity in connection with an activity related to your institutional responsibilities | <p>...disclose the item of value as an outside interest in M-Inform.</p> <p>...list the item on <i>Current and Pending Support/Other Support</i>, if it relates to your research or expertise.</p> | |
| ...have invented intellectual property optioned, licensed, or marketed 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>U-M Tech Transfer 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 travel expenses reimbursed directly to you 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. |

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| If you... | You should... | Contact / Resource |
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| ...plan on traveling internationally on U-M business | <p>...register the travel in the Faculty & 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>Global Michigan provides infrastructure and support services for international travel and education.</p> <p>The Export Controls Office 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> |
| ...have been offered a gift or donation from a from a foreign entity, individual, or government. | <p>...contact the Office of University Development (OUD).</p> <p>...refrain from signing any agreement to accept the gift/donation.</p> | <p>The Office of University Development assist U-M units in developing and maintaining private support opportunities and relationships with foundations and corporations.</p> |
| ...have a foreign entity propose an institutional partnership with U-M | <p>...contact Global Michigan to formalize any unfunded institutional relationships prior to beginning any engagement with the foreign entity.</p> <p>... refrain from signing any agreement that commits university resources.</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 Restricted Party Screening webpage.</p> |
| ...want to host at U-M a visiting scholar, student, tour group, or other individual from a foreign entity or government | <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"> • Within the School of Engineering, contact the Dean's Office to request RPS. • Within all other U-M schools, colleges, units, or organizations contact the U-M Export Controls Office (ECO) to request RPS. | <p>Restricted party screening ensures that no restricted entities or individuals are involved.</p> <p>For more information, see the Restricted Party Screening webpage.</p> <p>Global Michigan offers guidelines and checklists to develop a hosting event for international visitors.</p> |
| ...author a publication that acknowledges NIH support AND the publication has a foreign co-author or also acknowledges support from a foreign entity, individual, or government | <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 NIH Public Access Policy.</p> |
| ...participate in an NIH peer review process | <p>...refrain from sharing the peer review materials with unauthorized parties, including a foreign individual, entity, or government.</p> | <p>The Office of the Vice President and General Counsel provides legal advice to U-M personnel as it relates to their U-M professional responsibilities.</p> |