

NIH Foreign Component Guidance

In accordance with the NIH Grants Policy Statement, a foreign component is defined as performance of any significant element or segment of the project outside the United States, either by the recipient or by a researcher employed by a foreign organization, regardless of **whether or not grant funds are expended**.

NIH is interested in knowing when any aspect of a project will take place outside of the United States. When a “significant scientific element or segment of a project” is performed outside of the U.S., the NIH may consider it a foreign component. A foreign component may be approved as part of the original award, or it may need prior approval if added after an award is made.

See the full NIH Definition of Foreign Component at this link:

<https://grants.nih.gov/grants/glossary.htm#ForeignComponent>

NIH Foreign Components – Frequently Asked Questions (FAQ)

What is an NIH foreign component?

The National Institutes of Health (NIH) defines a **foreign component** as:

*“The performance of any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, **whether or not grant funds are expended**.”*

Significant activities include, but are not limited to:

- The involvement of human subjects or animals
- Extensive foreign travel by project staff for the purpose of data collection, surveying, sampling, and similar activities
- Any activity of the recipient that may have an impact on U.S. foreign policy

Activities that may meet this definition include:

- Collaborations with investigators at a foreign site anticipated to result in co-authorship;
- Use of facilities or instrumentation at a foreign site; or
- Receipt of financial support or resources from a foreign entity.

NIH requires disclosure of foreign components at proposal submission and may require **prior approval** if a foreign component is added after an award is made.

Why does NIH require disclosure of foreign components?

NIH uses foreign component disclosures to:

- Ensure appropriate scientific and financial oversight
- Assess compliance with federal requirements

- Address research security, transparency, and reporting expectations

Failure to properly disclose a foreign component may result in delays, additional NIH review, or compliance action.

When should a Purdue PI contact Sponsored Program Services (SPS)?

PIs should contact **Sponsored Program Services (SPS) in advance** if they plan to do any of the following on an NIH-funded project:

- **Have someone work on the project from outside the United States (paid or unpaid)**
 - This includes Purdue faculty, staff, postdoctoral researchers, students, or visiting scholars working while physically located outside the U.S.
 - Remote work outside the U.S. by a Purdue employee on an NIH award **may constitute a foreign component.**
- **Collaborate with an organization or institution outside the United States**
 - Including formal or informal collaborations that contribute to the scientific aims of the project.
- **Obtain services from an individual or entity located outside the United States**
 - Examples include laboratory services, data analysis, specimen processing, or consulting that supports the research aims.

What types of activities may be considered a foreign component?

NIH considers activities significant when they contribute meaningfully to the scientific scope of the project. Examples may include:

- Involvement of **human subjects or animals** outside the U.S.
- **Extensive foreign travel** for data collection, surveying, sampling, or similar research activities
- Collaborations at a foreign site expected to result in **co-authorship**
- Use of **facilities, equipment, or instrumentation** located outside the U.S.
- Receipt of **financial or in-kind research support** from a foreign entity

Not all international activity constitutes a foreign component; NIH makes determinations **case by case.**

What is SPS's role?

When a potential foreign component is identified, **SPS will coordinate with the NIH Program Officer (PO) and Grants Management Specialist (GMS)**, as appropriate, to:

- Determine whether the activity meets the NIH definition of a foreign component
- Confirm whether **prior NIH approval** is required
- Ensure appropriate documentation and disclosure

NIH prefers that potential foreign components be addressed **before** submission of an **RPPR** or implementation of changes to the project.

Key takeaway for Purdue PIs

If any part of an NIH-funded project may occur outside the United States—or involve individuals, organizations, or services located outside the U.S.—**early consultation with Sponsored Program Services is essential**. Proactive communication helps ensure compliance with NIH requirements and avoids delays or issues during award management or reporting.