

Determining Whether NIH Prior Approval is Required for a Foreign Component

Use this form to help determine if NIH Prior Approval is required for adding a foreign component to project. This is based on the best available guidance from the National Institutes of Health and is not a substitute for a thorough review of NIH and UCLA policies and guidance. For questions about international collaborations or activities on a proposal or award from other federal agencies, contact OCGA.

NIH Prior Approval is always required when [adding a foreign component](#) to an NIH grant.

NIH FOREIGN COMPONENT DEFINITION: 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. Activities that would meet this definition include, but are not limited to, (1) the involvement of human subjects or animals, (2) extensive foreign travel by recipient project staff for the purpose of data collection, surveying, sampling, and similar activities, or (3) any activity of the recipient that may have an impact on U.S. foreign policy through involvement in the affairs or environment of a foreign country.

Determine Foreign Involvement

1. Will activities or intellectual contributions in support of the NIH funded project be performed outside of the U.S.? Yes No

If you answered "Yes", proceed to the Determine Significance Section.

If you answered "No", you likely do not have a Foreign Component.

Determine Significance

1. Will the foreign activity or contribution involve human or animal subjects? Yes No
2. Will there be extensive foreign travel by recipient project staff for the purpose of data collection, surveying, sampling, or similar activities? Yes No
3. Will any activity of the project have an impact on U.S. foreign policy through involvement in the affairs or environment of a foreign country? Yes No
4. Will the contribution or activity abroad include direct and significant intellectual contributions to design, conductor analysis of research in pursuit of specific aims included in the NIH proposal or RPPR? Yes No
5. Will the contribution or activity abroad be considered fundamental or essential to the completion of the proposed aims/scope of work on a specific NIH funded project? Yes No

If you answered "Yes" to any of the Determine Significance questions, you must seek Prior Approval as an NIH Foreign Component before your international activities begin. **Contact OCGA (awards@research.ucla.edu) for assistance.**

If you answered "No" to all five of the Determine Significant questions, you likely do not have a Foreign Component. However, if you anticipate including foreign co-authors on publications that cite your NIH funding, use facilities or instrumentation abroad, or provide funds to or receive funds from a foreign entity, contact OCGA (awards@research.ucla.edu) for assistance in determining if this constitutes a Foreign Component.