
Standard Operating Procedures & Policies

Category:	Proposals
Procedure No.:	200.05
Title:	Foreign Components

I. Purpose & Overview

A. Purpose

To describe the Office of Research and Sponsored Projects' (ORSP) policy requiring the true, complete and accurate reporting of all Foreign Components pertaining to a faculty member's research.

B. Background

External funding agencies may require that U-M faculty report all foreign components and collaborations at the time of proposal submission,

For example, the National Institutes of Health (NIH) require that applicants disclose in their proposal if there is any foreign component to the scope of work for which it seeks support. NIH defines a "foreign component as, "The performance of any significant scientific element or segment of a project outside of the United States."¹ Two examples that NIH provides in defining the term foreign component are, "(1) performance of work by a researcher or recipient in a foreign location, whether or not NIH grant funds are expended and/or (2) performance of work by a researcher in a foreign location employed or paid for by a foreign organization, whether or not NIH grant funds are expended."

NIH further requires that grantees seek NIH's prior approval before adding a new foreign component to a funded project if the foreign component was not originally disclosed in the proposal

II. Procedure / Policy

The University of Michigan requires all researchers comply with all external funding sources' requirements for disclosing of any foreign component. It is also required that every disclosure to an external funding agency of any foreign component involved in research and other sponsored activities be true, complete and accurate to the best of the faculty member's knowledge.

When a foreign component exists, ORSP requires that this information be disclosed on the Proposal Approval Form (PAF) in the eResearch Proposal Management (eRPM) system and the foreign component should be properly addressed in all appropriate locations in the proposal.

When seeking prior approval to add a foreign component to an already existing award, the faculty member should work with their research administrator to complete a Post-Award Change Request (PACR) to initiate ORSP action.

¹ NIH GPS citation

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It is the investigator's responsibility to ensure the accuracy of foreign component reporting to funding agencies, in accord with the application guidelines or the sponsor's instructions. False, fictitious, or fraudulent statements or claims (including intentional omissions) in violation of this policy may result in criminal, civil, administrative or University penalties.