



**Mount  
Sinai Grants and Contracts Office**

**The National Institutes of Health (NIH) and  
Foreign Influences on Research Integrity  
A Guide to Navigating through NIH Policy and Procedure**

Rev. 8/2025

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# National Institutes of Health (NIH) and Foreign Influences on Research Integrity

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## I. Background

The latest NIH update is as per NIH Notice [Updated NIH Policy on Foreign Subawards \(NOT-OD-25-104\)](#), effective May 1, 2025, foreign subawards are no longer allowed on all NIH grants and cooperative agreements. Please see [section IV](#) for more information. Below is background information of foreign influences and research integrity.

During a 2019 hearing of a Senate panel that oversees the National Institutes of Health (NIH) budget, Senator Roy Blunt (R-MO), asked former NIH Director Frances Collins “..about NIH’s ongoing efforts to ensure that grantees are complying with agency rules on disclosing foreign ties, protecting the confidentiality of peer review, and handling intellectual property.

‘Something that the research community needs to take more seriously,’ Blunt said in his opening remarks, is ‘that foreign governments are initiating systematic ways to influence our research and frankly to take advantage of our research by stealing it.’ Blunt mentioned China in particular, which he said has a ‘government program to recruit NIH-funded researchers’ to set up shadow labs in China and steal U.S. intellectual property and confidential grant information.

‘I think NIH has to be sure that the research community is fully aware of the threats and more importantly, how to combat those threats,’ Blunt said.” Click [here](#) for additional information and review the [NIH Inquiries into Foreign Affiliations, Research Support, and Award Components](#)” Ropes & Gray teleconference slides.

The NIH has partnered with the Federal Bureau of Investigation (FBI) to investigate possible foreign interference with the integrity of federally-funded biomedical research and has contacted research institutions across the country regarding undisclosed relations with foreign entities.

The NIH has identified the following potential deficiencies in an investigator’s disclosure:

- Undisclosed dual appointments with foreign universities or institutes
- Undisclosed foreign grant support
- Undisclosed foreign components (e.g., foreign co-authors listed on publications of research supported by NIH

Although disclosures are the area in which institutions’ own obligations under federal funding requirements are most likely to be affected, NIH’s concerns are broader than disclosure failures and include the following:

- Operation of “shadow labs” in foreign countries, creating plausible claim that work generating intellectual property (IP) occurred outside the U.S.
- Theft of biomedical IP from confidential grant applications under review by NIH or from research supported by NIH.
- Breach of confidentiality in NIH peer review of grant applications to influence NIH award decisions.

Depending on the severity and duration of the noncompliance, NIH may decide to take one or more actions. This includes imposing specific award conditions, disallowing costs, withholding future awards for the project or program, suspending the award activities, making a referral for suspension or debarment, terminating the award, or revoking or taking title to the inventions made with the Federal support and pursuing patent protection or licensing the invention itself.

Mount Sinai investigators must disclose all forms of other support and financial interest including support from foreign governments or other foreign entities. Please refer to each section of this document for additional information. The terms “foreign component” and “foreign involvement” are used interchangeably.

## II. Foreign Components

The [definition](#) of foreign component from the NIH Grants Policy Statement (NIHGPS) is broad:

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:

- Involvement of human subjects or animals,
- Extensive foreign travel by recipient project staff for the purpose of data collection, surveying, sampling, and similar activities, or
- 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.

Examples of other grant-related activities that may be significant are:

- 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.

Foreign involvement is disclosed in these activities and NIH documentation:

- [Publications and other documents](#) when acknowledging NIH support (i.e., co-authorship with investigators at a foreign site)
- Grant Applications ([Competitive](#) or [Non-Competitive](#)) and [Prior Approval Requests](#)
- [Biosketch](#)
- [Conflicts of Interests Reporting and Foreign Travel Request](#)

### III. Publications and Other Documents: Acknowledging NIH-Supported Research

Investigators must acknowledge support in the following publications and works funded *in whole or in part* with Federal money:

- research publications
- press releases and other public statements
- other publications or documents about research that is funded by NIH requests for proposals and bid invitations
- other documents describing projects or programs

For instructions, please refer to the NIH webpage "[Communicating and Acknowledging Federal Funding](#)" and review this FAQ "[Should I cite my NIH grant when I publish?](#)"

Sometimes investigators would like to thank the NIH for their support *in general* and may disclose *all* the sources of support for his/her lab and/or *all* the sources of his/her salary in a publication even if the publication is not arising from the award. This is not appropriate.

- ✓ Only acknowledge support when the project is funded either completely or partially with Federal funds.
- ✓ Only acknowledge the grant(s) that supported the research described in the publication.

The investigator may also wish to include all sources of support in an effort to comply with a publication's broad standards for disclosing financial interests. This is also not appropriate.

Over acknowledging support can lead to an NIH investigation of noncompliance of the following "false positive" activities:

- Undisclosed/Unapproved Foreign Involvement
- Undisclosed Scientific Overlap
- Undisclosed/Unapproved Change of Scope
- Undisclosed/Unapproved Human Subject or Vertebrate Animal Activity

In addition, acknowledging multiple awards in a publication may be taken as an indicator of scientific overlap among the cited projects. This is an issue when the Principal Investigator's next competitive application is being considered by reviewers, advisory council members and NIH staff.

*Statement above adapted from "[Why Is It important to Accurately Acknowledge NIGMS Grants in Publications?](#)"*

#### IV. Updated NIH Policy on Foreign Subawards (NOT-OD-25-104)

Please review GCO's recommendations and key points on NIH's recently released notice "[Updated NIH Policy on Foreign Subawards \(NOT-OD-25-104\)](#)" in which effective May 1, 2025 "NIH will not issue awards to domestic or foreign entities (new, renewal or non-competing continuation), that include a subaward to a foreign entity." The NIH notice is included here after the recommendations.

##### Recommendations and Key Points

- **May/June/July 2025 Competing Submission:** Please consider if a foreign subaward can be replaced domestically. If it cannot, in the Foreign Justification attachment clearly indicate how the subaward serves U.S. interests.

- **Current Awards that Received Funding for this Federal Fiscal Year Already:** No changes at this time. Changes will impact you next year.
- **Current Awards that Did Not Yet Receive Funding for this Federal Fiscal Year AND the RPPR is Already Submitted**

We await further guidance. Your award will likely be delayed and/or may skip funding this fiscal year. Please consider if the foreign subaward can be removed or replaced domestically. If yes, please reach out to GCO to discuss renegotiation of the award.

- **Current Awards that Did Not Yet Receive Funding for this Federal Fiscal Year AND the RPPR is Not Yet Submitted**

Please consider if the foreign subaward can be removed or replaced domestically. If yes, **urgently** act on finalizing plans as part of preparing RPPR, and reach out to GCO to discuss renegotiation of the award. If no, submit as is, but make contingency plans if funding is disrupted.

- **Changing Your Current Subaward to a Consulting Agreement As Appropriate**

You may be considering changing your current subaward to a consulting agreement. As a reminder, per the Uniform Guidance, it is the substance of the relationship, not the contractual vehicle, that determines if an entity qualifies as a subrecipient or consultant. In most cases, we cannot change a current subaward to a consulting agreement. Please refer to GCO's [Subawardee, Consultant, and Vendor Determination Checklist](#) for additional information.

- **Foreign Consultants**

Allowed at this time. However, consider minimizing if not necessary.

- **Purchase of Unique Equipment or Supplies from Foreign Vendors**

Allowed at this time. Please remember to include the cost of tariffs in your budget.

- **Non-Monetary Foreign Collaborations**

Examples: Unpaid sharing of data, samples, materials, etc. Allowed at this time.

- **Domestic Subawards**

NIH plans to expand the new award structure to domestic subawards (i.e., independent award to the subaward with scientific progress reporting through the prime) in the future. We await future guidance.

## Updated NIH Policy on Foreign Subawards

Notice Number: [NOT-OD-25-104](#)

### Key Dates

Release Date:

May 1, 2025

### Related Announcements

None

### Issued by

NATIONAL INSTITUTES OF HEALTH ([NIH](#))

### Purpose

This Guide Notice updates NIH policies and practices utilizing foreign [subawards](#). NIH recognizes that some recipients do not accurately report on subawards consistent with Federal Funding Accountability and Transparency Act (FFATA) subaward reporting requirements ([NIH GPS 8.4.1.5.5](#)), which state that recipients must report on all subawards/subcontracts/consortiums equal to or greater than \$30,000. This includes awards that are initially below \$30,000 but subsequent grant modifications result in an award equal to or greater than \$30,000. This lack of transparency is particularly concerning in the case of foreign subawards, in which the United States government has a need to maintain national security.

In an effort to maintain strong, productive, and secure foreign collaborations in support of the NIH mission, NIH must ensure it can transparently and reliably report on each dollar spent. **Therefore, NIH is establishing a new award structure that will prohibit foreign subawards from being nested under the parent grant.**

This new award structure will include a prime with independent awards that are linked to the prime that will allow NIH to track the project's funds individually, while scientific progress will be reported collectively by the primary institution, under the Research Performance Progress Report.

NIH anticipates implementing the new award structure by no later than September 30,

2025, prior to Fiscal Year 2026.

## **Applicability**

NIH's policy change **applies prospectively** to all NIH grants and cooperative agreements to domestic and foreign entities (new, renewal and non-competing continuation).

NIH will not retroactively revise ongoing awards to remove foreign subawards at this time. NIH continues to support direct foreign awards. This policy applies to all monetary foreign collaborations.

It does not apply to funds provided to support foreign consultants, or purchasing unique equipment or supplies from foreign vendors. NIH plans to expand this policy to domestic subawards in the future, for consistency in implementing the new award structure.

## **Policy**

Effective with the date of this notice and until the details of the new foreign collaboration award structure are released, NIH will not issue awards to domestic or foreign entities (new, renewal or non-competing continuation), that include a subaward to a foreign entity. Additionally, NIH will no longer accept prior approval requests to add a new foreign component or subaward to an ongoing project. In all cases, NIH will allow Institutes, Centers and Offices (ICOs) to renegotiate awards, whether new, renewal or non-competing, to remove subawards to foreign entities and, where the work can be performed domestically, allow the funds to be rebudgeted for use by the prime recipient (domestic or foreign) or a domestic subrecipient.

If a project is no longer viable without the foreign subaward, NIH will work with the recipient to negotiate a bilateral termination of the project, taking into consideration any need to support patient safety and/or animal welfare.

Notices of Funding Opportunities (NOFOs) that state that foreign components are allowed are superseded by this notice. NIH will revise NOFOs to reflect the new award structure.

## **Inquiries**

Please direct all inquiries to:

NIH Office of Policy for Extramural Research Administration

[OPERAleadership@mail.nih.gov](mailto:OPERAleadership@mail.nih.gov)

## V. Competitive Grant Applications

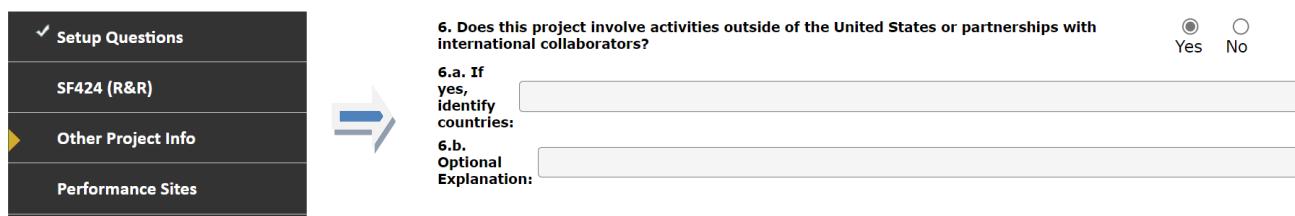
As per NIH notice [NOT-OD-25-104](#) effective May 1, 2025 "NIH will not issue awards to domestic or foreign entities (new, renewal or non-competing continuation), that include a subaward to a foreign entity." Other type of foreign components are allowable (e.g., foreign consultant, foreign travel). Please review the section [IV. Updated NIH Policy on Foreign Subawards](#) for guidance on foreign subawards.

Depending on the type of foreign involvement, there are different sections where this information may also be disclosed in a competitive application (e.g., new, competitive renewals, resubmission).

### A. Other Project Information Page: Required

Whenever there is [foreign involvement](#), question 6 in the Other Project Information Page must be answered "Yes." Remember that if you are including a letter of support from a foreign collaborator, the answer should be "Yes."

Below is a screenshot of the Other Project Information page as a S2S submission through InfoEd.



✓ Setup Questions

SF424 (R&R)

Other Project Info

Performance Sites

6. Does this project involve activities outside of the United States or partnerships with international collaborators?

6.a. If yes, identify countries:

6.b. Optional Explanation:

Yes  No

Below are additional instructions from the [NIH SF 424 Guide](#). The NIH SF424 includes additional instructions for fellowships and multi-project applications.

### 6. Does this project involve activities outside of the United States or partnerships with international collaborators?

This field is required.

Indicate whether this project involves activities outside of the United States or partnerships with international collaborators. Check "Yes" or "No."

Applicants to NIH and other PHS agencies must check "Yes" if the applicant organization is a foreign institution or if the project includes a foreign component. See NIH Glossary for a definition of a [foreign component](#).

If you have checked "Yes" to Question 6, **you must include a "Foreign Justification" attachment in Field 12, Other Attachments.** Describe special resources or characteristics of the research project (e.g., human subjects, animals, disease, equipment, and techniques), including the reasons why the facilities or other aspects of the proposed project are more appropriate than a domestic setting. In the body of the text, begin the section with a heading indicating "Foreign Justification" and name the file "Foreign Justification."

#### 6.a. If yes, identify countries:

This field is required if you answered "Yes" to Question 6. Enter the countries with which international cooperative activities are planned.

You may use abbreviations. Your entry is limited to 55 characters.

#### 6.b. Optional Explanation:

This field is optional. Enter an explanation for involvement with outside entities. Your entry is limited to 55 characters.

## B. Performance Sites Tab, if appropriate

The Project/Performance Site Location(s) Form is used for all grant applications. It is used to report the primary location and any other locations at which the project will be performed. Include foreign site/s if appropriate.

Below is a screenshot of the Other Project Information page as a S2S submission through InfoEd.



The screenshot shows the 'Performance Sites' tab selected in the left sidebar. The main area displays a table for entering organization details. The table has columns for 'Sequence', 'Organization Name', and 'Address'. The 'Organization Name' column contains fields for 'UEI' and 'Congressional District'. The 'Address' column contains fields for 'Address', 'City', 'State', 'Non-US State/Province', 'Province', 'Zip/Postal Code', 'County', and 'Country'. The top right corner shows 'Completed' with an unchecked box, 'OMB Number: 4040-0010', and 'Expiration Date: 12/31/2022'.

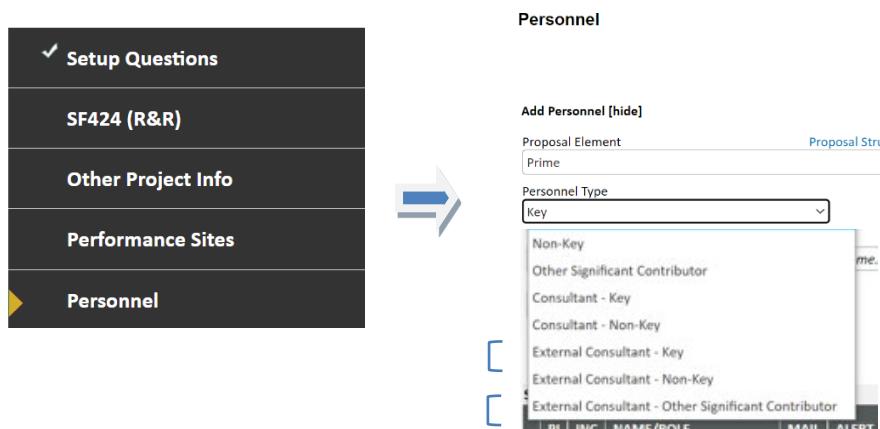
Below are additional instructions from the [NIH SF424 Guide](#). Refer to NIH SF424 Guide for additional instructions.

### Project/Performance Site Location 1

Use this "Project/Performance Site Location 1" block to provide information on performance sites in addition to the Primary Performance Site listed above, if applicable. **Include any VA facilities and foreign sites.**

## C. Senior/Key Personnel Form, if appropriate

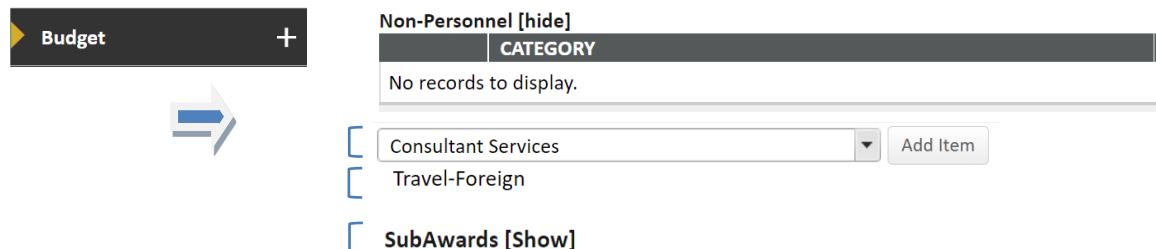
Unless otherwise specified in a FOA, senior/key personnel are defined as all individuals who contribute in a substantive, meaningful way to the scientific development or execution of the project, whether or not salaries are requested. Consultants should be included in this "Senior/Key Person Profile (Expanded)" Form if they meet this definition. List individuals that meet the definition of senior/key regardless of what organization they work for.



The screenshot shows the 'Personnel' tab selected in the left sidebar. The main area displays a 'Personnel' table with columns for 'Proposal Element' (set to 'Prime') and 'Personnel Type' (set to 'Key'). A dropdown menu shows other options: 'Non-Key', 'Other Significant Contributor', 'Consultant - Key', 'Consultant - Non-Key', 'External Consultant - Key', 'External Consultant - Non-Key', and 'External Consultant - Other Significant Contributor'. The top right corner shows 'Completed' with an unchecked box, 'OMB Number: 4040-0001', 'Expiration Date: 12/31/2022', and a green 'Edit Mode' button.

If you are working with foreign consultants and other significant contributors, choose "External Consultant" and add the appropriate designation.

## D. Budget Tab



The screenshot shows the 'Budget' tab selected. A sidebar on the left lists categories: 'Budget', 'F&A', 'Cost Sharing', and 'Justifications'. The 'Justifications' category is expanded, showing 'SubAwards [Show]'. The main content area is titled 'Non-Personnel [hide]' and shows a table with a single row for 'CATEGORY'. A message says 'No records to display.' Below the table are buttons for 'Add Item' and a dropdown menu with 'Consultant Services' and 'Travel-Foreign' selected. A blue arrow icon is positioned between the sidebar and the main content area.

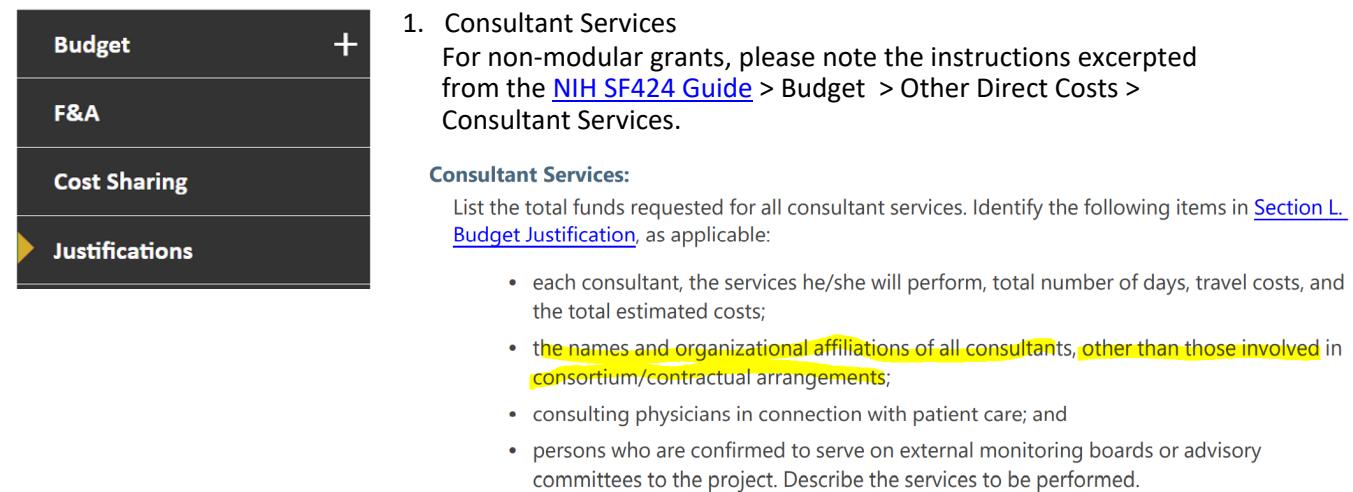
### 1. Consultant Services

For non-modular grants, please choose Consultant Costs if appropriate. See the budget justification section below for more information.

### 2. Travel

For non-modular grants, please choose Foreign Travel Costs if appropriate. See the budget justification section below for more information.

## E. Budget Justification



The screenshot shows the 'Justifications' section expanded in the sidebar. The main content area contains instructions for 'Consultant Services'. It states: 'For non-modular grants, please note the instructions excerpted from the [NIH SF424 Guide](#) > Budget > Other Direct Costs > Consultant Services.' Below this, under 'Consultant Services', it says: 'List the total funds requested for all consultant services. Identify the following items in [Section L. Budget Justification](#), as applicable:'. A bulleted list follows:

- each consultant, the services he/she will perform, total number of days, travel costs, and the total estimated costs;
- the names and organizational affiliations of all consultants, other than those involved in consortium/contractual arrangements;**
- consulting physicians in connection with patient care; and
- persons who are confirmed to serve on external monitoring boards or advisory committees to the project. Describe the services to be performed.

### 2. Travel

For non-modular grants, please note the instructions excerpted from the [NIH SF424 Guide](#) > Budget Justification > Travel.

### D. Travel



The screenshot shows the 'D. Travel' section. A message at the top says 'Additional Instructions for Career Development:'. Below it, a link says 'Skip the "D. Travel" section.'

#### 1. Domestic Travel Costs (Incl. Canada, Mexico, and U.S. Possessions):

Enter the total funds requested for domestic travel. Domestic travel includes destinations in the U.S., Canada, Mexico, and U.S. possessions. In [Section L. Budget Justification](#), include the purpose, destination, dates of travel (if known), and the number of individuals for each trip. If the dates of travel are not known, specify the estimated length of trip (e.g., 3 days).

#### 2. Foreign Travel Costs:

Identify the total funds requested for foreign travel. Foreign travel includes any destination outside of the U.S., Canada, Mexico, or U.S. possessions. In [Section L. Budget Justification](#), include the purpose, destination, dates of travel (if known), and the number of individuals for each trip. If the dates of travel are not known, specify the estimated length of trip (e.g., 3 days).

**F. Biosketches for Senior/Key Personnel, if appropriate**

Please review the [Biosketch](#) section of this document.

## VI. Annual Research Performance Progress Report (RPPR)

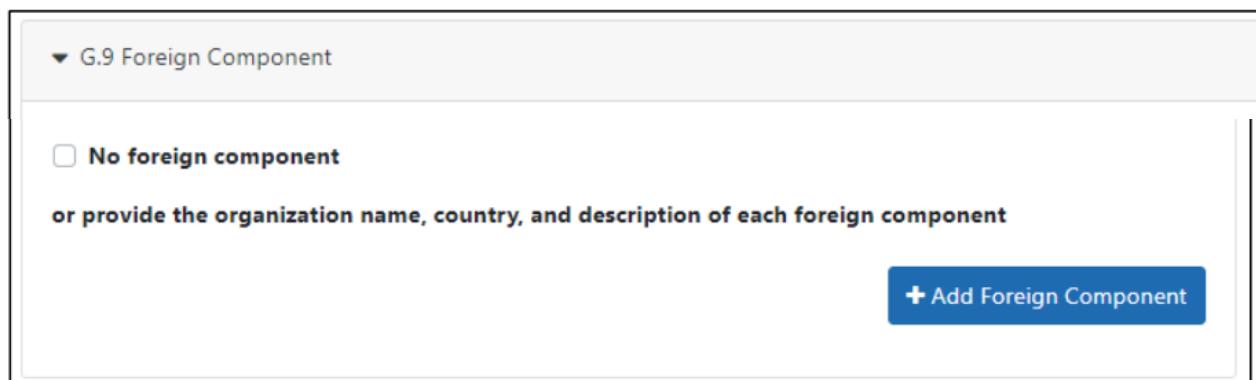
As per NIH notice [NOT-OD-25-104](#) effective May 1, 2025 "NIH will not issue awards to domestic or foreign entities (new, renewal or non-competing continuation), that include a subaward to a foreign entity." Other type of foreign components are allowable. Please review the section [IV. Updated NIH Policy on Foreign Subawards](#) for further guidance.

Depending on the type of foreign involvement (e.g., foreign subaward, consultant, travel), there are numerous other places where this information may also be disclosed in the RPPR.

The NIH RPPR instructions are [here](#) and excerpted below.

### A. Special Reporting Requirements: Required – Section G.9 of NIH Application

G.9 Foreign component. Provide the organization name, country, and description of each foreign component.



▼ G.9 Foreign Component

**No foreign component**

**or provide the organization name, country, and description of each foreign component**

**+ Add Foreign Component**

### B. Participants – Section D of NIH Application

This section allows the agency to know who has worked on the project to gauge and report performance in promoting partnerships and collaborations.

#### 6.4 Section D – Participants

The RPPR Section D. allows the agency to know who has worked on the project to gauge and report performance in promoting partnerships and collaborations.

##### D.1 What individuals have worked on the project?

Provide or update the information for: (1) program director(s)/principal investigator(s) (PDs/PIs); and (2) each person who has worked at least one person month per year on the project during the reporting period, regardless of the source of compensation (a person month equals approximately 160 hours or 8.3% of annualized effort).

Provide the name and identify the role the person played in the project. Indicate the person months, rounded to the nearest one-tenth (Calendar, Academic, Summer) that the individual worked on the project.



##### Is the individual's primary affiliation with a foreign organization?

Check **No** if the individual's primary affiliation is with a foreign organization but the individual is working on this award solely while in the U.S.

If **Yes**, provide the name of the organization and country. Select the **Add Participant** button to add the data to the table.

Filter Table 5 Results + Add Participant

Download Print 1 of 1 >

Name	Commons ID	S/K	Degree(s)	Role	Calendar	Academic	Summer	Org	Person Months		SS	Foreign Country	Foreign Affiliation
									0	0			
BROWN, JAN	BROWN	Y	PHD	PD/PI		0	0					Not Applicable	
Shelley Miyamoto		Y	DVM, PHMD	PD/PI		0	0					Not Applicable	
Smith, Jeffrey		N		Lab Assistant		0	0					Not Applicable	

#### D. Impact – Section E of NIH Application

E. 4 - What dollar amount of the award's budget is being spent in foreign country(ies)? If more than one foreign country identify the distribution between the foreign countries.

▼ E.4 What dollar amount of the award's budget is being spent in foreign country(ies)?

For domestic awardees provide the dollar amount obligated to first-tier subawards to foreign entities for this reporting period. For foreign awardees provide the dollar amount of the award, excluding all first-tier subawards to U.S. entities, for this reporting period. Dollars provided should reflect total costs.

If more than one foreign country, identify the distribution between the foreign countries. [?](#)

**Nothing to Report** (zero dollars)

+ Add Amount

Cancel Save

#### E. Special Reporting Requirements – Section G of NIH Application

##### G.8 Project/Performance Sites.

If there are changes to the project/performance site(s) displayed, edit as appropriate.

▼ G.8 Project/Performance Sites

+ Add Project/Performance Sites

If there are changes to the project/performance site(s) displayed below, edit as appropriate.

Filter Table 27 Results Download Print 1 of 2 >

Organization Names	UEI	Congressional District	Address
Regents of the University	XX2222222XX	CA-003	1850 Park Drive, Davis, CA 86153
Regents of the University	XX2222222XX	CA-003	1850 Park Drive, Davis, CA 86153

## VII. Prior Approval Requests

If foreign involvement was not disclosed in the competitive NIH application or a subsequent Research Performance Progress Report, please submit a prior approval request as per the standard process described in the [NIH Prior Approval Requirements and Rebudgeting Policy](#).

As per NIH notice [NOT-OD-25-104](#) effective May 1, 2025 "NIH will not issue awards to domestic or foreign entities (new, renewal or non-competing continuation), that include a subaward to a foreign entity." Other type of foreign components are allowable. Please review the section [IV. Updated NIH Policy on Foreign Subawards](#) for further guidance.

Submit the information below to the GCO or use the [NIH Foreign Component Prior Approval Form](#). The GCO will review and submit the information or form to the National Institutes of Health Institute or Center (NIH I/C) for prior approval.

1. Primary Institution Name and Address  
Icahn School of Medicine at Mount Sinai (ISMMS)  
1 Gustave L. Levy Place, Box 1075  
New York, NY 10029
2. ISMMS Principal Investigator Name
3. Project Number

### Foreign Component Information

4. Institution Name: *Investigator must be affiliated with this institution. If investigator is not affiliated with an Institution, please leave blank and use the "other" section for additional clarification.*
5. Country in which research will be conducted
6. Names of Foreign Component Collaborating Investigators
7. Foreign Component Address: *Provide as much detail as possible.*
8. Collaborating Investigator Telephone Number
9. Collaborating Investigator E-mail Address

*The information requested is regarding the research conducted at the foreign component. Do not include information about studies performed in the U.S. or at another site.*

10. AIDS Related? Y/N
11. Involves Biodefense? Y/N
12. Description of Activities to be Conducted at the Foreign Component:  
*Describe the activities to be conducted at the foreign component written for a lay audience. The NIH I/C is responsible for approving this activity.*
13. Total Amount Requested  
*If appropriate, add total requested amount.*
14. Budget: Attach or State None  
*If appropriate, attach a budget which includes the total costs per year at the foreign component.*

## **VIII. Biosketch**

The NIH Biosketch is submitted to the NIH for all [senior/key personnel](#) and [other significant contributors](#) in the competitive grant application. Biosketches are also included in the Research Performance Progress Report (RPPR) when there are new senior/key personnel and other significant contributors.

Complete instructions and sample biosketches can be found [here](#).

### NIH Instructions – Positions, Scientific Appointments, and Honors – Section B

List in reverse chronological order all current positions and scientific appointments both domestic and foreign, including affiliations with foreign entities or governments. This includes titled academic, professional, or institutional appointments whether or not remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary). High school students and undergraduates may include any previous positions. For individuals who are not currently located at the applicant organization, include the expected position at the applicant organization and the expected start date.

List any relevant academic and professional achievements and honors. In particular:

- Students, postdoctorates, and junior faculty should include scholarships, traineeships, fellowships, and development awards, as applicable.
- Clinicians should include information on any clinical licensures and specialty board certifications that they have achieved.

### GCO FAQs

1. Q: Do I only include paid positions on my biosketch?

A: No, include all current positions and scientific appointments, whether or not they are salaried. See the NIH Biosketch Section B Instructions for complete information.

2. Q: Work on this project will be conducted at another institution at which I have an appointment. Do I need to include this appointment?

A: Yes, include this appointment on your biosketch.

3. Q: I have an appointment in China at China's Best Medical College restricted to teaching and mentoring. I plan to offer graduate students there the opportunity to travel to New York and to do their theses at Mount Sinai working on this grant. Do I need to include this appointment on my Biosketch?

A: Yes, include this appointment on your biosketch.

4. Q: I have an appointment at Moscow State University in Russia restricted to teaching and mentoring. I am mentoring a student there on her graduate thesis. The thesis topic is unrelated to my grant application. I don't plan to involve her or any future Moscow State students in my NIH funded research. Do I need to include this appointment on my biosketch?

A: Yes, include this appointment on your biosketch.

## **IX. Other Support**

The NIH requests Other Support pages for each senior/key personnel designated in an application (i.e., investigator) as part of the Just In Time (JIT) and RPPR processes. Other Support includes all resources made available to a researcher in support of and/or related to all of their research endeavors.

- This includes resources and/or financial support from all foreign and domestic entities that are available to the researcher.
- This is regardless of whether or not they have monetary value.
- This is regardless of whether they are based at the institution the researcher identifies for the current grant.

Training awards, prizes or gifts do not need to be included.

If an investigator has a foreign appointment and/or employment or an unpaid appointment with a foreign institution, the NIH also requires copies of contracts/agreements including foreign sponsored project agreements to be submitted with the Other Support page. Provide all foreign contracts/agreements/ sponsored project agreements in the original foreign language in advance to the designated GCO Grants Specialist. Please review the Other Support Instructions for additional information.

If you have a foreign appointment please review the Multiple Research Appointment section of the Other Support Instructions regarding reporting effort.

In addition to the Other Support Instructions, the GCO has numerous resources and training sessions for the preparation of the Other Support page that can assist investigators with foreign appointments, such as the Other Support Template and the Other Support Checklist and GCO's Other Support Class Series. Please visit the GCO's Application Information page > NIH – NSF Biosketch and Other Support Info for more information.

### GCO FAQs

1. Q: I have a dual appointment with the University of Ontario. I am a PI on a grant for the Canadian Institutes of Health there. Do I need to include this on my Other Support page?  
A: Yes, this financial resource directly supports your research endeavors. It is necessary to include this award on your Other Support page. Please include sections labeled Icahn School of Medicine at Mount Sinai and University of Ontario under both the awarded and pending portions of your Other Support page and list this grant in the appropriate spot. See GCO's OS Instructions re: reporting global effort on multiple research appointments.
2. Q: I am an Adjunct Professor at Fudan University. I am listed as a Co-Investigator on a Chinese National Science Foundation award held by that University. I do not personally receive any compensation, but the grant pays for technicians' salaries and the supplies for the aim that I work on when visiting Fudan. Do I need to include this award on my Other Support page?  
A: Yes, this financial resource directly supports your research endeavors. It is necessary to include this appointment on your Other Support page. Please include sections labeled Icahn School of Medicine at Mount Sinai and Fudan University under both the awarded and pending portions of your other support and list this grant in the appropriate spot. See GCO's Other Support Instructions for information on reporting global effort on multiple research appointments.
3. Q: I was awarded a postdoctoral fellowship from the Onassis Foundation in Greece. A stipend is paid directly to me. Do I need to include this award on my Other Support page?  
A: Yes, this financial resource directly supports your research endeavors. It is necessary to

include this appointment on your Other Support page.

4. Q: I am a Pulmonologist and I do consulting work for Teva Pharmaceuticals in Israel in their asthma program. On behalf of Teva, I consult on the development of a monoclonal antibody that specifically targets IL-5 in order to interrupt its production. My research at Sinai focuses on treating respiratory disorders. Do I need to include my consulting position on my Other Support page?

A: No, this consultancy does not support your research endeavors. It is not necessary to include this activity on your Other Support page. However, don't forget to include this consulting work on your annual Conflict of Interest Disclosure.

5. Q: I just won a Nobel Prize from Karolinska Institute! Do I need to include this award on my Other Support page?

A: First off, congratulations! It is not necessary to include this award on your Other Support page because prizes are specifically excluded.

## X. Conflicts of Interest and Reporting Foreign Travel

### Background

The U.S. Department of Health and Human Services (HHS) issued a [final rule](#) August 25, 2011 in the Federal Register on Financial Conflict of Interest Regulations (FCOIR)- Responsibility of Applicants for Promoting Objectivity in Research for Which Public Health Service Funding is Sought and Responsible Prospective Contractors.

Please refer to the ISMMS Faculty Handbook > [Financial Conflicts of Interest in Research](#) > What Must Be Disclosed? for a faculty member's obligations.

Also, please refer to [Pre-Trip Travel Requirements](#) for registering foreign travel at Mount Sinai and for other important instructions.

The GCO is providing FAQs on reporting foreign travel and including the NIH's FAQs below.

### GCO FAQs

1. Q: Is it true that I must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to my institutional responsibilities?

A: Yes, that is true. (Source: [final rule](#))

2. Q: How about if my spouse is reimbursed for travel by a foreign entity? Does that need to be reported?

A: Yes, spouses and dependent children are subject to the Final Rule FCOI regulation. (Source: [final rule](#))

3. Q: What is the minimum amount to be reported?

A: Mount Sinai's policy is that there is no minimum amount. (Source: ISMMS Faculty Handbook > [Financial Conflicts of Interest in Research](#) > What Must Be Disclosed?)

4. Q: Where do I report reimbursed or sponsored travel?

A: Disclose this on the Annual Conflict of Interest form which can be amended throughout the year. Specifically refer to this section of the form. (Source: [final rule](#)) Section VIII. Federally- Funded Research (Federal Requirement)

If you traveled during [year of annual form], was your travel paid by any entity other than Mount Sinai? You may also chose to report the travel prospectively if you know in advance that it will be occurring.

5. Q: Are there any exceptions?

A: Yes, travel paid for by federal, state or local governments, institutions of higher education, academic teaching hospitals, medical centers or research institutes are excluded from reporting.

6. **Q: Those are pretty broad exceptions. If all of my travel is paid for by institutions of higher education, academic teaching hospitals, medical centers or research institutes, may I ignore these regulations?**

**A: There is an exception to the exception. This exclusion does not apply to foreign institutions. Do report sponsored travel paid for by any foreign source including institutions of higher education, academic teaching hospitals, medical centers or research institutes. (Source: NIH Notice [NOT-OD-18-160](#))**

7. Q: What if I fail to report my sponsored travel? How will anyone know?

A: If it is unintentional, please do report immediately. Please be aware that the FBI is tracking who is leaving and returning to the US by air, what class ticket they have and who paid for that ticket. They are sharing that information with the NIH. (Source: Ropes and Gray Webinar on "NIH Inquiries into Foreign Affiliations, Research Support, and Award Components" March 25, 2019 [Teleconference Replay](#) / [Presentation Slides](#))

[NIH FAQs on FCOIR](#)

Select NIH FAQs are included below.

- [Does an Investigator need to disclose all reimbursed or sponsored travel, no matter the dollar level, if it is reimbursed or sponsored by sources other than those excluded from disclosure \(i.e., Federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001\(a\), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education\)?](#)
- [What about payments to or assets held by my spouse or dependent children?](#)

Must these financial interests to be disclosed?

- [Is an Investigator required to disclose all financial interests received from a foreign Institution of higher education or the government of another country? \(Institution and Investigator\)](#)

## XI. Mount Sinai Resources and Links

Please contact the offices below with any questions you may have. Relevant policies and procedures are also included.

- [\*\*Conflicts of Interest \(COI\) Office\*\*](#)
  - [Instructions for Completing the Financial Interests in Research Disclosure Form](#)
  - [Instructions for Completing the Annual Report of Outside Relationships Message](#)
  - [from Dean Charney re: Consulting and Other Paid Activities Faculty Consulting - Attestation of Compliance Form](#)
- [\*\*Grants and Contacts Office \(GCO\)\*\*](#)
  - [Biosketch: Who Must Submit](#)
  - [Biosketch and Other Support FAQs](#)
  - [Other Support: List of Most Common Errors](#)
  - [Other Support Instructions](#)
  - [Other Support Training: GCO 400-series](#)
  - [NIH Prior Approval Requirements Policy](#)
  - [NIH Foreign Component Prior Approval Form](#)
- [\*\*Mount Sinai Innovations Partners \(MSIP\)\*\*](#)
  - [Intellectual Property Policies and Procedures](#)
- [\*\*Office of Global Operations\*\*](#)
  - [Pre-Trip Travel Requirements](#)

## XII. Highlights of Significant Changes from Previous Versions

<b>Section</b>	<b>Description of Change</b>
8/2025	<ul style="list-style-type: none"><li>- Added new section Updated NIH Policy on Foreign Subawards (<a href="#">NOT-OD-25-104</a>) and updated relevant sections with this information.</li><li>- In the Conflicts of Interest and Reporting Foreign Travel section, added <a href="#">Pre-Trip Travel Requirements</a> link for registering foreign travel at Mount Sinai and for other important instructions.</li></ul>
8/17/2022	<ul style="list-style-type: none"><li>- Updated and newly organized Foreign Component, Biosketch, Other Support and Component Prior Approval sections.</li><li>- Reorganized all sections</li><li>- Removed information about original GCO Helpful Hints communication columns</li><li>- Added NIH instructions in the Competitive Grant Application and RPPR sections.</li></ul>
6/29/2019	Reorganization of material and updated to adhere to <a href="#">NOT-OD-21-073</a>