

FDP Research Security Subcommittee

Co-authorship and Foreign Components: A Discussion with NIH Extramural Leadership

FAQs Derived from Session
September 15, 2026

*NIH thanks the Federal Demonstration Partnership for their productive sessions
and follow-up actions that benefit all applicants and recipients.*

Scenarios

1. U.S. researcher moving to foreign institution

Professor Bravo is a researcher at a foreign institution. Before joining the foreign institution, she was a postdoctoral scholar working with Professor Alpha at a U.S. university. During her postdoctoral appointment in the U.S., Professor Bravo contributed to Professor Alpha's NIH supported project and helped draft a manuscript describing the results. Before the manuscript was submitted for publication, Professor Bravo left the U.S. university to begin her position at the foreign institution. In her new role, Professor Bravo continues to review, edit, and comment on the draft manuscript.

- a. **Does manuscript editing by a former postdoctoral scholar who is now employed by a foreign university constitute a foreign component?**

No. Professor Bravo performed the significant scientific elements of the project while she was at the U.S. institution. Professor Bravo's current activities are limited to editing and commenting on the existing draft and therefore do not constitute significant scientific work performed outside the U.S.

- b. **What if Professor Bravo performed experiments and data analysis for the NIH project at her new institution?**

Yes, this would be a foreign component. Conducting experiments and analyzing data are significant scientific elements. Because Professor Bravo would perform this work outside the U.S., it would constitute a foreign component. Professor Bravo may not perform any significant element of the NIH supported project outside the U.S. unless Professor Alpha first obtains NIH approval for a foreign component. If Professor Bravo anticipates performing significant work on the project, she must either return to the U.S. to perform the work or notify Professor Alpha so that prior approval may be requested from NIH. If the NIH award

does not permit foreign components, Professor Bravo may not perform significant work on the project while outside the U.S.

c. Which institutional affiliation should Professor Bravo list on the manuscript?

The affiliation listed in the manuscript should reflect where the work was performed. If Professor Bravo performed all significant scientific elements of the project while she was a postdoctoral scholar at the U.S. institution, she should list the U.S. institution as her affiliation and may include a footnote (or as applicable, per journal standards) identifying the foreign institution as her current affiliation. If Professor Bravo conducts significant scientific work outside the U.S. as an approved foreign component, she should list both affiliations in the manuscript.

2. Research performed prior to award

Charlie is a graduate student at a U.S. university. Two years ago, Charlie asked a friend who was studying at a foreign university to analyze data using the foreign university's equipment and resources. The work was not federally funded, no formal agreement was in place, and no funds were exchanged. Charlie would now like to use the data in an active NIH project.

a. Does using data collected and analyzed before the NIH award constitute a foreign component requiring prior approval?

No. Although data analysis performed outside the U.S. is considered a significant scientific element, the analysis occurred before the NIH project began.

b. May the foreign student who performed the analysis two years ago be listed as a coauthor on publications that acknowledges the NIH award?

Yes. Data analysis is a significant scientific element that warrants co-authorship. The publication's acknowledgments and author affiliations should accurately reflect each contributor's role, as well as when and where the work was performed. If a publication is building upon and acknowledging previous work, note in the acknowledgements section that [co-author] contributed to early work on X,Y,Z funded by [funding source]. Later work was funded by [NIH grant].

3. Receiving materials from a foreign institution

Professor Sierra, a researcher at a U.S. institution, requests materials from Professor Tango, a researcher at a foreign institution. Professor Tango provides the materials, and Professor Sierra uses the materials in the U.S. for her NIH project. Professor Tango does not otherwise participate in or contribute intellectually to the project.

a. Does receiving materials from a foreign institution constitute a foreign component?

No. Professor Tango's provision of the materials was a one-time transaction. She did not participate in or contribute intellectually to the NIH supported project.

b. Should Professor Tango be included as a coauthor on publications resulting from the NIH project?

No. Professor Tango does not qualify for authorship because she did not contribute intellectually to the project. However, the publication's acknowledgments should recognize her provision of the materials. If the materials provided by Professor Tango are novel, not widely available, and constitute an intellectual contribution to the project, Professor Tango should be included as an author.

c. What if the materials are provided by a company or university on a restricted-party list?

The source's status as a restricted party does not determine whether the activity constitutes a foreign component. However, obtaining materials from a restricted party may be prohibited by applicable laws, regulations, or award terms. Professor Sierra should contact the institution's research security or sponsored research office before requesting or accepting the materials.

4. Defining collaboration

Professor Oscar occasionally speaks with a colleague at a foreign institution about their shared research interests. Professor Oscar receives NIH funding, and their conversations sometimes include topics related to Professor Oscar's NIH projects.

a. Do these conversations constitute a foreign component?

No. Occasional, informal discussions with a colleague at a foreign institution do not constitute the performance of a significant scientific element outside the U.S., nor do they constitute a "collaboration" as that term is used in the definition of a foreign component. Other activities that are not considered "collaboration" include:

- Discussions involving general scientific concepts and ideas
- Discrete, one-way transactions such as receiving or sharing data or materials, even if governed by a non-disclosure agreement, Material Transfer Agreement, Data Use Agreement, or similar agreement.
- Licensing intellectual property
- Serving on a committee or advisory board for a foreign institution
- Attending and/or presenting at foreign conferences
- Receiving gifts from foreign individuals or institutions
- Serving as a peer reviewer

If the activity involves the foreign colleague contributing intellectually or performing substantive work on the NIH project, such as helping design the research, analyzing data, conducting experiments, or preparing publications, it would be considered a collaboration and a foreign component. Other activities that would be considered "collaboration" include:

- Written agreements with a foreign institution that include a Statement of Work, research aims, and deliverables.
- Engaging in designing research plans and objectives.
- Analyzing data, conducting experiments, or drafting publications.

Publication after Grant Has Ended

- 5. My NIH grant has ended and I have decided to write a paper with a colleague at a foreign institution with whom I've had informal discussions. Do I need prior approval from NIH?**

No. If the NIH award has ended, there is no mechanism for obtaining prior approval for a new foreign component under that project. However, if the publication includes work that was conducted during the active award period, faculty should ensure that all NIH reporting requirements were previously met. Publications arising from the NIH funded work and this new collaboration should carefully delineate in the acknowledgements section when each part was done and how it was funded.

Previously Published Data

- 6. I am a co-author on a review article that summarizes previously published scientific literature and includes several foreign co-authors. Do I need NIH prior approval?**

No. Authorship on a review article, including foreign co-authors, does not by itself constitute a foreign component because it does not involve foreign performance of NIH-supported project activities and ostensibly would not cite an NIH grant. The determination may differ if new, unpublished NIH-supported research activities were conducted as part of the review.

Collaboration

- 7. I have an active NIH award and have developed a collaboration with a colleague at a foreign institution. We have co-authored a paper that has been accepted for publication. Do I need NIH prior approval?**

Maybe. Foreign co-authorship alone does not necessarily constitute a foreign component. However, NIH prior approval is required if the foreign collaborator participated in a significant scientific element or segment of the NIH-supported project, regardless of whether NIH funds were provided to the foreign institution. Examples may include conducting experiments, collecting data, performing analyses, or otherwise carrying out project activities outside the United States. If you believe the collaboration may constitute a foreign component, contact your NIH Program Officer and your institutional research administration office promptly.

- 8. What should I do if a paper has already been published with a foreign co-author and I did not disclose the collaboration in my NIH application or request prior approval?**

Contact your NIH Program Officer and your institutional research administration office as soon as possible. NIH will assess the specific circumstances to determine whether the collaboration

constituted a foreign component and whether any corrective action or additional reporting is required.

9. What if pausing a foreign collaboration while NIH reviews the Foreign Component request could compromise the scientific integrity of the research?

If suspending the foreign component would cause an irreversible or significant scientific consequence, for example, loss of a specialized biological model, missed time points in a longitudinal study, or loss of irreplaceable specimens or data, the recipient should promptly notify its institutional officials and Program Office. The recipient should explain the time-sensitive nature of the activity, the consequences of interruption, and any feasible alternatives, and seek NIH guidance before proceeding with activities that require foreign-component approval.

(Derived from 9/1/26 Meeting with NIH and Discussed at FDP Session)

Retroactively Restricted Entities

Equipment Purchased from an Entity Later Added to Restricted Lists

10. An institution purchased equipment (e.g., sequencing equipment from BGI) before the entity was added to a restricted parties list. The equipment is already installed and in use on NIH-funded projects. Can the institution continue to use the equipment on NIH-funded projects?

Institutions and researchers are advised to discontinue use of equipment provided or manufactured by restricted companies. Contact NIH if needed.

Data or Materials Derived from a Restricted Entity

11. A collaborator provided biological materials or datasets before the collaborator's home institution was added to a restricted list. Can the institution continue to use the materials or data in ongoing NIH-funded work?

The collaboration must be discontinued, and the institution may **not** continue to use materials or datasets previously obtained from the restricted entity. The institution is advised not to accept additional materials or data from the restricted entity and should not share information with the restricted entity.

Research Collaborations Disguised as Service Agreements

When does a "Service Provider" Arrangement Constitute a Foreign Component?

- 12. An institution engages a foreign researcher or entity to perform defined analytical work (sequencing, statistical analysis, imaging) under a service agreement rather than a formal subaward. Does this constitute a foreign component?**

Fee-for-service service or vendor arrangements do not constitute foreign components unless the provider/vendor participates in research design or decision-making. In-kind vendor services must be disclosed in Current and Pending Support and Research Performance Progress Reports (RPPR), with Institute/Center notification within 30 days. Grantees should not reclassify foreign sub-awards as vendors to avoid approvals. If the work no longer rises to the level of a formal foreign collaborator but you need their services and are not otherwise engaged in the research, provide that level of detail in documentation to the program manager. In general, staff providing work through a service agreement should not be authors on manuscripts that result from the work. If authorship is anticipated, it is an indication that the work is really a collaboration and not appropriate for a service agreement.

Collaborators Moving to Foreign Institutions

- 13. A co-investigator or collaborator with whom the PI has been working in the U.S. accepts a position at a foreign institution. The collaboration is ongoing. What are the PI's obligations?**

Alert NIH and ask for approval as soon as you become aware the collaborators will be moving to a foreign institution.

- 14. A Submitted Manuscript Includes a Foreign Co-Author Whose Affiliation Changed After Submission**

Cite the affiliation where the work was performed. The new affiliation can be included as a footnote ("current address").

- 15. A PI submitted a manuscript for publication in which a co-author was affiliated with a U.S. institution. By the time of acceptance, that co-author has moved to a foreign institution. Should the manuscript be delayed or revised?**

No, the affiliation where the work was performed should be cited. The current address of the researcher can be indicated through a footnote.

Prior Approval Turnaround Times and Work Continuity

- 16. Our institution submitted a prior approval request for a foreign component. How long should we expect review to take, and must the PI pause all research during review?**

The PI should not carry out the foreign component prior to approval. All other research can continue until prior approval is obtained. NIH cannot estimate the time for approving the foreign component, as this will vary depending on complexity and associated details. Therefore, recipients must reach out as early as possible to the administering ICO.

- 17. An NIH program officer instructed the PI to "stop" the research collaboration pending resolution of a prior approval request. Does this mean pause all research, or halt only the foreign collaboration?**

Only the foreign component of the project for which you are seeking prior approval needs to be stopped. The domestic work can continue.

In-Kind Contributions from Foreign Entities (Countries of Concern)

- 18. A foreign collaborator or institution offers to donate equipment, materials, or analytical services to an NIH-funded project at no cost. Does this constitute a foreign component, and how should it be reported?**

A foreign collaborator or institution offering to donate equipment, materials, or analytical services would constitute an in-kind contribution, and the provision of in-kind contributions does not in and of itself constitute a collaboration or foreign component. However, in-kind contributions must be disclosed as described at <https://grants.nih.gov/policy-and-compliance/policy-topics/foreign-interference/requirements-for-disclosure>. Senior/Key Personnel on an NIH grant must report in Current and Pending (Other) Support ""in-kind contributions requiring a commitment of time and directly supporting the individual's research and development efforts, such as the provision of office or laboratory space, equipment, supplies, employees or students."

Differing Guidance from Different NIH Institutes and Program Officers

- 19. Our PIs have received different feedback from different NIH Institutes regarding whether specific collaborations constitute foreign components. How should the institution respond?**

Reach out to the Office of Policy for Extramural Research Administration (OPERA) at: OPERALeadership@nih.gov if you've received a response that doesn't align with the FAQs and other FDP discussions, and they will assist you. As a rule of thumb, grants and program managers should answer your questions. They should not tell you as the grantee what to do but can certainly help guide your decisions.

Co-Authorship and Foreign Components

Does Having a Foreign Co-Author Automatically Make a Project a Foreign Component?

- 20. The recent Nexus article and NIH guide notices suggest "most instances of co-authorship represent a foreign component." Our faculty are confused. Is every paper with a foreign co-author a foreign component?**

Most instances of foreign co-authorship represent a foreign component. If there is an expectation that a foreign collaboration will result in co-authorship, seek approval for a foreign component. If not collaborating directly and the foreign co-author did not work on the grant (e.g., an NIH-funded researcher and a foreign researcher both independently work with the same domestic collaborator

who is not funded by the NIH), then this would not be considered a foreign component. Authors should be clear in the publication who did what, what portions of the research were funded by the NIH grant and, if possible, with whom they collaborated. It can be challenging for NIH to understand the relationship from a publication unless this information is clearly delineated.

How Do We Document Whether Significant Scientific Work Occurred in the U.S. or Abroad?

21. Our institution struggles with the "significant scientific work" standard. How do we consistently apply this?

There will always be gray areas and grantees will need to use their best judgement. However, as described above, if co-publication is expected to result from an engagement with a foreign researcher, the institution needs to carefully consider whether it's a foreign component, and disclose it as appropriate

Informal Consultations with Foreign Colleagues

One-Time Material or Data Transfer from a Foreign Institution

22. A foreign institution provides biological samples or a dataset to a U.S. researcher for a one-time transfer, and there is no ongoing interaction. Is this a foreign component?

This is not considered significant if it is just a one-way transfer. Hopefully there is a material or data transfer agreement which defines it as a transfer and not a collaboration. It is cloudier if you're going to include them as a co-author. Follow good authorship practices to ensure "courtesy" authorship doesn't create unnecessary confusion about whether an interaction was a collaboration or not.

23. Can I co-author publications with a foreign unpaid consultant on my grant?

Yes, a foreign unpaid consultant on your grant suggests that the solicitation allowed for foreign components and that the foreign consultant/collaborator was disclosed to NIH. No restrictions on co-authored publications would be anticipated.

SUMMARY OF CRITICAL ISSUES

Collaborator moves to a foreign institution following work on a project in the U.S.: Edits or manuscript revisions made by a researcher who relocates to a foreign institution do not constitute a foreign component, whereas conducting new experiments, data collection or additional analyses does. Authors should cite the institution where the research was performed and may include a footnote for their current affiliation, if different. If the collaboration is ongoing, PIs should seek (prior) approval from NIH as soon as possible. Institutions should ensure that their faculty are aware of the policy to limit delays in reporting a foreign component. Grant in citations in papers should be clear about what grants

supported what parts of the work and when it was done. The timing of moves can be described in the acknowledgments, if possible. List both affiliations if there was an approved foreign institution.

Foreign countries of concern: Foreign components in a foreign country of concern (per a to-be-published list associated with the USG policy for stopping high-risk life sciences research; Currently China, Russia, North Korea and Iran under the CHIPS Act) will likely be denied. NIH suggested it would be wise for grantees to start positioning themselves for this now so that they do not have to terminate/address this later.

Visiting students and scholars: Affiliation should be where the work was conducted, not their home institution. A footnote may be used for foreign affiliation, if needed.

Travel and Foreign Appointments: Foreign travel or sabbaticals [exceeding 90 days](#) while receiving grant salary and conducting work outside the U.S. could be considered a foreign component. Holding formal appointments at foreign institutions should be reported to NIH. A researcher staying engaged with their lab while on foreign vacation or conference travel is not considered a foreign component.

Funding Acknowledgement: NIH stressed strict grant citation hygiene under the Stevens Amendment (see [NIH GPS 4.2.1](#)), instructing researchers to cite grants but only if they directly supported a portion of the work (e.g., personnel, reagents, supplies). Attributing publications to grants that did not actually support the described work does not align with NIH policy and could inadvertently result in compliance actions. If a publication is building upon and acknowledging previous work, note in the acknowledgements that [co-author] contributed to early work on X,Y,Z funded by [funding source]. Later work was funded by [NIH grant].

Receiving materials from a foreign institution: This is not considered significant if just the one-way transfer. Hopefully there is a material transfer agreement which defines it as a transfer and not a collaboration. It is cloudier if you're going to include them as a co-author. NIH suggested it doesn't seem to merit authorship but that this is more a question of authorship standards. Try to follow good authorship practices.