

**Int.nat’l Research Activity Flow Chart: Reporting/Disclosure Obligations**

This is a summary of the most common Investigator reporting obligations related to international research activities. This is not an exhaustive account of reporting obligations. If you have any questions, please contact Research Operations, reaching out to Director of Pre-Award, Stephanie Wasserman at [Stephanie.wasserman@bmc.org](mailto:Stephanie.wasserman@bmc.org), or Senior Research Compliance Manager, Michelle Irick at [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org).

1. **Foreign Components** (*What is a* [*Foreign Component*](https://grants.nih.gov/grants/policy/nihgps/html5/section_1/1.2_definition_of_terms.htm)*?*)

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| If you… | Then… | Contact/Resource |
| …plan to include a **foreign component** in an NIH research proposal | …obtain prior approval from NIH by submitting a *Foreign Justification* document with the grant application.  Be aware that NIH now requires sending copies, with translation at our cost, of **foreign contracts** with applications.  Contact Director of Pre-Award, Stephanie Wasserman at [Stephanie.wasserman@bmc.org](mailto:Stephanie.wasserman@bmc.org) for assistance on your grant and contact Senior Research Compliance Manager, Michelle Irick at [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org) for compliance questions or concerns. | Your Department Administrator; Pre-Award Grant Administrator prior to award; Post-Award Grant Administrator after award receipt.  [Research Operations Website](https://www.bmc.org/research-operations): See Other Support and Foreign Component resources  [Research Application Instructions for NIH and Other PHS Agencies](https://grants.nih.gov/grants/how-to-apply-application-guide.html)  [NIH and Other PHS Agency Research Performance Progress Report (RPPR) Instructional Guide](https://grants.nih.gov/grants/rppr/rppr_instruction_guide.pdf)  [NOT-OD-19-114: Reminders of NIH Policies on Other Support…](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html)  [NIH FAQs: Other Support and Foreign Components](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm)  For any “Foreign Component” you did not disclose as part of your annual COI Questionnaire, you must update your disclosures by contacting the BMC COI Compliance Office at [COI-Compliance@bmc.org](mailto:Jami.Wood@bmc.org) |
| …have an **approved foreign component** in an NIH-funded project | …include a *Description of Foreign Component* in the annual progress report (RPPR).  Contact Director of Pre-Award, Stephanie Wasserman at [Stephanie.wasserman@bmc.org](mailto:Stephanie.wasserman@bmc.org) |
| …need to **add/amend a foreign component** at Just-in-Time or on an awarded research project, or **you want to collaborate** on an NIH sponsored project with an individual who is temporarily working outside the US | …Contact your Pre-Award Grant Administrator (GA) if before receipt of a Notice of Award (NOA). Contact your Post-Award GA if after receipt of an NOA. They will guide you through the process to submit for prior approval and report the approved foreign component in the next RPPR.  Contact Director of Pre-Award, Stephanie Wasserman at [Stephanie.wasserman@bmc.org](mailto:Stephanie.wasserman@bmc.org) for assistance on **adding or amending.**  Contact Senior Research Compliance Manager, Michelle Irick at [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org) for **international collaborations.**  When drafting your biosketch, take a fulsome approach, listing all international affiliations and resources in the biosketch as opposed to what you think is relevant. For resources, NIH now asks for estimated valuations in the biosketch. NIH, using JCORE guidance, is updating policies and forms – providing details on in-kind contributions, defining “gifts”, and outlining the purpose of the biosketch, |
| …co-author a **publication** that acknowledges NIH support **AND** 1) the publication has a **foreign co-author**, and/or 2) **acknowledges support** from a foreign entity, individual, or government | …clarify whether work for the publication was performed outside the U.S. and, if so, ensure that NIH approval was obtained for the foreign component and, if applicable, that you reported external financial support on Other Support. Contact Director of Pre-Award, Stephanie Wasserman at [Stephanie.wasserman@bmc.org](mailto:Stephanie.wasserman@bmc.org) for assistance on your grant and contact Senior Research Compliance Manager, Michelle Irick at [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org) for compliance questions or concerns. | Publications that arise or result from NIH-supported research must comply with the acknowledgements and reporting requirements of the [NIH Public Access Policy](https://grants.nih.gov/grants/policy/nihgps/html5/section_8/8.2.2_nih_public_access_policy.htm).  Contact Research Operations at [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org) for questions. |

1. **Other Support** (What is Other Support)

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| **If you…** | **Then…** | **Contact/Resource** |
| …have **applied for** or have received **funding** from a foreign institution or government through BMC, through another domestic institution (e.g., Broad Institute) and/or a foreign hospital or university | …list the funding on *Current and Pending Support/Other Support,* as you would for all other sponsored funding.  Be aware that your biosketch should take a fulsome approach to disclosure of affiliations and support, not only those you deem relevant to the project for which you are applying, which is a change. It needs to also include estimated valuations.  Contact Director of Pre-Award, Stephanie Wasserman at [Stephanie.wasserman@bmc.org](mailto:Stephanie.wasserman@bmc.org) for assistance on your grant and contact Senior Research Compliance Manager, Michelle Irick at [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org) for compliance questions or concerns. | Contact Director of Pre-Award, Stephanie Wasserman at [Stephanie.wasserman@bmc.org](mailto:Stephanie.wasserman@bmc.org) for assistance on your grant. Contact Senior Research Compliance Manager, Michelle Irick at [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org) for compliance questions or concerns.  Your Department Administrator; your Pre-Award Grant Administrator.  [Research Operations Website](https://www.bmc.org/research-operations): See Other Support and Foreign Component resources  [NIH Other Support: What’s Different?](https://www.bmc.org/sites/default/files/Research/documents/NIH_Other_support_InfoGraphic_BMC.pdf)  [Other Support & Foreign Component Guidance](https://www.bmc.org/sites/default/files/Research/documents/Other_Support_and_Foreign_Component_Guidance.docx)  [Research Application Instructions for NIH and Other PHS Agencies](https://grants.nih.gov/grants/how-to-apply-application-guide.html)  [NIH and Other PHS Agency Research Performance Progress Report (RPPR) Instructional Guide](https://grants.nih.gov/grants/rppr/rppr_instruction_guide.pdf)  [NOT-OD-19-114: Reminders of NIH Policies on Other Support…](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html)  [NIH FAQs: Other Support and Foreign Components](https://grants.nih.gov/faqs#/other-support-and-foreign-components.htm)  For any items of “Other Support” you did not disclose as part of your annual COI Questionnaire, **you must update your disclosures** by contacting the COI Compliance office at [COI-Compliance@bmc.org](mailto:Jami.Wood@bmc.org) |
| …have access to **non-financial resources** (e.g., office/lab space, research materials, equipment, staff) at BMC or through an outside foreign or domestic entity (this includes foreign governments or foreign government sponsored-programs) | …list the non-financial support on *Current and Pending Support/Other Support* |
| …want to work with **visiting personnel** or **postdoctoral fellows with their own domestic or foreign support** that flows through BMC, is received directly by the researcher, or flows through a non-BMC institution. | …list the personnel on the appropriate grant’s *Current and Pending Support/Other Support*.  …things to consider when visiting personnel or postdocs from foreign entities leave your Partners institution and are continuing to work with you on a publication... If the publication interaction is limited to reviewing/editing drafts prior to journal submission, there is no need to consider these activities a foreign component and seek prior approval. However, if the foreign researcher will be performing additional experiments or engaging in other substantive research tasks outside of the country, then the activity could be considered a foreign component by NIH. In these situations, you should contact your Program Officer to make this determination and follow his/her instructions. |

1. **Outside Activities**

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| **If you…** | **Then…** | **Contact/Resource** |
| …have a **position or affiliation** - - paid, unpaid, or honorary -- with a foreign or domestic institution | …list the position/affiliation in your biosketch, keeping in mind developing NIH guidance.  …list the position/affiliation on *Other Support*, if it relates to your research or expertise and funding is provided. …disclose the relationship, including your position/affiliation title, as a financial interest or an unpaid association | Follow the sponsor’s guidance on what information to include in a biosketch.  For questions contact Research Compliance at  [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org).  For any positions or affiliations you did not disclose as part of your annual COI Questionnaire, you must update your disclosures by contacting the COI Compliance office at [COI-Compliance@bmc.org](mailto:Jami.Wood@bmc.org) |
| … are participating in a **foreign talent recruitment program** | …list and identify the specific talent recruitment program and funding provided on *Current and Pending Support/Other Support*. …list your talent recruitment program position/affiliation title in the Biosketch …disclose the relationship, including your position/affiliation title, as a financial interest or an unpaid association  **Institutions are required to submit copies of foreign contracts and awards** for all foreign activities and resources that are reported in Other Support. If they are not in English, recipients must provide translated copies. Contact [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org) for questions and coordination. | Some federal agencies require prior approval of talent program participation/support for research funded by that agency; others will not fund individuals with foreign talent program support Check the RFA/RFP for any limitations.  For any items you did not disclose, including talent programs as a financial interest or unpaid associations, whichever is appropriate, you must disclose this as part of your annual COI Questionnaire, you must update your disclosures by contacting the COI Compliance office at [COI-Compliance@bmc.org](mailto:Jami.Wood@bmc.org) |
| …have a **paid or unpaid personal consulting or advisor** relationship with a foreign entity | …disclose the relationship as an outside interest, as a financial interest or an unpaid association, and update your COI disclosures by contacting the COI Compliance office at [COI-Compliance@bmc.org](mailto:Jami.Wood@bmc.org)  **Institutions are required to submit copies of foreign contracts and awards** for all foreign activities and resources that are reported in Other Support. If they are not in English, recipients must provide translated copies. Contact [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org) for questions and coordination. | Research Operations and Compliance reviews outside interest disclosures to identify potential conflicts of interest in research activity. You are required to disclose not only your outside interests, but also the outside interests of your spouse, domestic partner, or dependent(s) if those interests relate to your institutional responsibilities.  For questions on Outside Activities, contact [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org) for research compliance questions, and contact [Stephanie.wasserman@bmc.org](mailto:Stephanie.wasserman@bmc.org) for Pre-Award questions. |
| ….have **travel expenses** paid by or reimbursed directly to you from a foreign entity, individual or government | …disclose the payment or reimbursement as a travel expense and update your COI disclosures by contacting the COI Compliance office at [COI-Compliance@bmc.org](mailto:Jami.Wood@bmc.org) |
| …have an **ownership interest** in a foreign entity | …disclose the relationship as an outside interest as a financial interest or an unpaid association and update your COI disclosures by contacting the COI Compliance office at [COI-Compliance@bmc.org](mailto:Jami.Wood@bmc.org) |
| …have personally received a **non-financial item of value** from a foreign entity | …disclose the item of value as in-kind payment and update your COI disclosures by contacting the COI Compliance office at [COI-Compliance@bmc.org](mailto:Jami.Wood@bmc.org) |

1. **Other**

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| **If you…** | **Then…** | **Contact/Resources** |
| …plan on **traveling internationally** on institutional business related to your BMC responsibilities and plan on taking your BMC laptop with you | …contact BMC Research Compliance, Michelle Irick at [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org) and the Export Control Officer, [Heather.Skinner@bu.edu](mailto:Heather.Skinner@bu.edu) for an export controls review, especially if traveling to Russia, China or a sanctioned country (e.g., Iran or North Korea) to confirm the materials/information you will be sharing are not restricted and that the institution or individual is not subject to sanctions or otherwise restricted  ….contact your hospital Information Security Officer at [Lee.Cullivan@bmc.org](mailto:Lee.Cullivan@bmc.org) | [Research Operations Website](https://www.bmc.org/research-operations): See Other Support and Foreign Component resources  Your hospital Information Security Officer provides infrastructure and support services for international travel. BMC’s Research Compliance office in coordination with BU’s Export Control Office assists you in obtaining federal licenses to travel to/from restricted locations and/or to take (i.e., export) certain technology with you on the trip.  [Travel and Transferring Data & Authorization Letter Instructions](https://www.bmc.org/sites/default/files/Research/documents/Travel-and-Transferring-Electronic-Data.docx)  … if instead you need to transfer biological materials, see:  [Travel and Transferring Biological Materials](https://www.bmc.org/sites/default/files/Research/documents/Travel-and-Transferring-Biological-Materials.docx) |
| …have been **offered or have received a gift (cash and/or in-kind equipment or services)** to support your institutional research or other institutional responsibilities from a foreign entity, individual, or government. | …contact BMC’s Development Office and d**o not sign** any agreement or documents accepting the gift/donation without first checking with your BMC’s Development Office. | Your Hospital Development Office:  BMC Development:  [philanthropy@bmc.org](mailto:philanthropy@bmc.org) |
| …have a foreign entity **propose an institutional research relationship** with BMC. | …in addition to the departmental and other hospital leadership you may be working with, you should also notify your Research Compliance office. A restricted party screening may be necessary to ensure that no restricted entities or individuals are involved. | Contact the Research Compliance at [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org) for general questions.  Contact the International Students and Scholars Office (ISSO) for international students at [isso@bu.edu](mailto:isso@bu.edu), and BMC HR at [HRConnect@bmc.org](mailto:HRConnect@bmc.org) for other individuals. |
| …want to **host a visiting scholar, student, tour group, or other individual** from a foreign entity or government at BMC |
| …participate in an **NIH peer review process** | …do not share the peer review materials with any unauthorized parties, including but not limited to, a foreign individual, entity, or government. | Inform your immediate supervisor of the opportunity. If you have any questions or concerns, please contact the Senior Research Compliance Manager at [michelle.irick@bmc.org](mailto:michelle.irick@bmc.org). |