

ORA Office Hours: Foreign Sites & Subawards

School of Medicine
Office of Research
Administration

October 23, 2025
11 AM



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M E D I C I N E

Office Hours Overview

- I. Welcome
- II. Reminder – Research Security Training
- III. Policy Notices
- IV. Clarification of Subaward Frameworks
- V. Q&A

Research Security Training / Reminders & Clarification

- Required for **ALL** Principal Investigators (PIs) and Senior/Key Personnel
- Annual training module
- *No training, no federal proposal submissions*

Policy Notices – Foreign Components / Subawards

NOT-OD-25-104 – **May 1, 2025**

- New NIH policy and structure for foreign components and subawards
 - Independent awards linked to prime
 - Collaborative reporting - TBD
- Does not apply to vendors or consultants
- Future expansion to domestic sites



Policy Notices (cont.)

NOT-OD-25-130 – July 18, 2025

- New framework: current awards with foreign sites
 - Human subjects research sites.
 - \$ Issued as supplements to the parent grant.
 - Separate financial reporting/PMS account.
 - Set up as a separate grant: new SAP grant, new PD, new subaward agreement

Policy Notices (cont.)

NOT-OD-25-155 – September 12, 2025

PROPOSAL

- Foreign Subs not allowed in applications from September 24, 2025
- New mechanisms – RF5 and UF5
- Parent Notice of Funding Opportunities (NOFOs)
- Multi-component structure: *International Research Component*
- Prime site must be domestic.
- Multi-PI, One domestic, at least one international PI.
- New application requirements

Policy Notices (cont.)

NOT-OD-25-155 – September 12, 2025

POST-SUBMISSION

- Review: Overall impact score. Split after
- Separate Just-In-Time
- Possible for some, none or all components to be funded
- New RPPR structure.

Q&A

