

ORA Office Hours FAQs: Foreign Sites and Supplements

October 23, 2025

1. What do you think will happen when the PF5/UF5 parent award is released and is ORA planning any training for foreign sites?
 - a. We will have to see what is in the announcements themselves and how fundamentally the process is going to change. We don't typically do a training session just because there is a new mechanism, but if there are big changes to ASSIST (the ASSIST package), which is likely, then we will have some sort of guidance (e.g. handout) for JHU faculty and staff. We do not provide training for non-JHU sites.
2. Do these changes apply to resubmissions of grants submitted prior to September 2025?
 - a. Most likely, but we don't have any guidance on how that is going to work yet. Our current understanding is that if you plan to resubmit an R01 with a foreign site, for example, that it will have to be a multi-component structure application. In other words, you won't be able to resubmit under the parent R01 announcement with a foreign site, but we don't know exactly how NIH is going to handle this yet.
3. Can you go back over the Letter of Intent (LOI) and Research Security Training (RST) requirements for our subsite PIs?
 - a. This is an evolving situation. As you know, a few days before the research security training policy was to go into effect, NIH rescinded part of it. Institutions are interpreting this differently and FDP is working on a template for all FDP users that will provide documentation to their collaborators confirming compliance with the new policy. We were working on updates to our LOI template to include this RST compliance language, but are now going to wait for the FDP version before deciding which one JHU will use.

In the meantime, please get a written confirmation (email is fine) from the subsite that states their institution is complying with all federal policies. If that language is already included in the other institution's LOI ORA do not need a separate email from the subsite. Please do not request copies of training certificates for external investigators.
4. Can foreign entities still send JHU (incoming) subawards, or has this also changed?
 - a. This is a good question that we don't have clarity on yet. We are not sure if this new framework is specifically for when domestic sites work with foreign entities. Hopefully this will be something that NIH addresses in their FAQs once they release the full policy updates.
5. Do you think there will be enough information released for RF5/UF5 submissions in the winter cycle or does the timeline look more delayed?
 - a. Prior to the government shutdown our understanding was that this information would be released in November and implemented in January, but now it's hard to know how the shutdown will impact this timeline.
6. What if the subsite states that they are not currently compliant with the RST policy and refers us to the rescission notice (RST-related)?

- a. This is tricky because the Research Security Training also covers the Other Support training policy that was implemented on October 1, 2025 and that policy was not rescinded. Please reach out to your ORA Grants Associate for guidance if you encounter this situation.
7. How does the budget work for foreign sites? If we budget, say, \$10,000 for a site in the proposal, can we send them more than that amount if the proposal is funded?
 - a. Under the new structure foreign sites will be funded directly from NIH. Funds will no longer transfer between a prime award and subaward.
8. We are submitting a renewal application for a clinical trial for January 2026, it is a UG1. Can we include foreign sites in this application?
 - a. No. Foreign subawards are prohibited in proposals as of September 24, 2025. The only way to include foreign sites will be under the new framework. Cooperative agreement proposals, such as UG1s, will need to submit under the UF5 mechanism to include foreign sites.
9. How do the Indirect Costs (IDC) on foreign subawards factor into all of this if the subsites are getting their own award? Does anything change in how we calculate our IDC on the first \$25,000 of the subaward?
 - a. Under the new RF5/UF5 framework JHU will no longer be a pass-through entity and thus will not/administer foreign subawards. NIH will issue any funding/awards directly to the subsite. Our understanding is that the subsite proposal will be a separate component of the proposal with its own budget. We believe that domestic subsites will still be in place, at least initially, so if you have a subsite to Harvard you will follow the usual (current) budget process (i.e. JHU taking IDC on the first \$25,000 of the domestic site).
10. For research grants, are the R01 or R21 no longer applicable to grants with foreign subawards?
 - a. Correct. Foreign subawards are prohibited as of September 24, 2025. R01, R21, U01, etc. Notice of Funding Opportunities (NOFOs) will only permit domestic subaward sites. If you are planning a proposal with a foreign subaward site, you will need to use the new RF5/UF5 mechanism when it is implemented.

If you have a foreign consultant or foreign vendor, you *will* be able to use the regular R01 mechanism. Where a foreign entity will play a significant role in the project design, creation, development, and/or execution they would be considered a subaward and the RF5/UF5 mechanisms would be required.

11. NIH notice NOT-OD-25-155 mentions that one of the review points will be “the use of unusual talent, resources, populations, or environmental conditions in other countries that are not readily available in the United States or that augment existing U.S. resources.” What does that entail? Would that necessitate that the foreign PI can do something that no one in the US can do (because that is somewhat unlikely), or would having an existing collaboration on a certain topic with the foreign PI be enough?
 - a. The wording in NOT-OD-25-115 is very similar to how NIH explains the need for foreign justification in the current proposal structure. Essentially, you must explain why you are using

this specific collaborator, why this site vs. a domestic site, etc. In many cases, you've been working with someone for many years or there's something unique that they're bringing to your application and it doesn't necessarily mean that they are the only person in the world who does X work, but they are someone you have a good rapport with, who does amazing things, and/or is a good match for the project. That's really what NIH is getting at. Be sure to explain your thought process for including this person/subsite – for instance, they can help my grant in this way, we can benefit each other, this collaboration benefits public health, that sort of thing.

12. Will imprest accounting mechanisms that allow activities in foreign settings without subawards be allowable?
 - a. We don't know yet. There are still a lot of unknowns about how the new structures will work and what will be allowable under/what policies will govern the new funding mechanisms.
13. Are foreign subs currently not allowed on DOD applications as well?
 - a. So far, this policy only applies to NIH and some other institutes. We have not seen this coming from DOD (yet).
14. We have a foreign site on an R01 grant awarded prior to 5/1/25, do we need to use the new mechanism to continue the foreign site's funding after this current budget period?
 - a. The new structure is not available yet. For current awards, foreign site funding—this only applies to sites conducting human subjects research—will be issued as a supplement of the parent grant.

The current process is as follows:

- You should submit your RPPR (progress report) as usual and include the subsite in the report.
- As part of their review process, NIH will contact the PD/PI to present several options on how to restructure the upcoming budget period.
 - Some of the options include issuing a supplement to foreign sites conducting human subjects research, or removing the foreign subsite and reallocating funds to the prime or another domestic site.
- If the PI chooses to continue the foreign sub, the JHU (parent) award will receive a continuation award notice that will only include funds for JHU and any domestic subsites, if applicable.
- A separate supplement Notice of Award (NOA) will then be issued with funds for the foreign subsite only.
- If you have multiple foreign subsites each site will receive its own supplement.

We do not know if this process will change in the future.

It's also important to note that because we are receiving new supplement NOAs for these foreign sites, this is necessitating additional documentation to set up the supplements in SAP.

- Department staff will need to submit a new Fibi PD supplement record for each new foreign supplement so that an Institute Proposal Number (IPN) can be created for Sponsored Project Shared Services (SPSS).
- A new SAP grant number must be created for each supplement so that the funds are tracked separately from the JHU parent award.
- On the outgoing subawards side, the ORA Subawards team then must close the original subaward agreement and purchase orders (PO), then issue a new subaward(s) and PO(s) for the foreign site(s).

15. Will I need a new subaward agreement?

- a. Yes, a new subaward agreement for a foreign subsite will be needed because the SAP number changes with the new supplement NOA.

16. Can I extend the existing agreement with a new Purchase Order (PO)?

- a. No. NIH will issue a new supplement award specifically for the foreign site, necessitating a new subaward agreement. The current agreement cannot be extended with a new PO.

17. What do I do if my new IPN doesn't show in SWiFT?

- a. Please confirm that the new foreign supplement award notice (NOA) was workflowed to Sponsored Projects Shared Services (SPSS) and that it has received a new SAP number.
- b. Then, please email the ORA Outgoing Subawards team at ORASubcontracts@jhmi.edu and cc' Rhanota Edwards with the Fibi Institute Proposal Number (IPN). The team will add the IPN into SWiFT and will email you confirming that has been completed.

18. The Internal Order field is greyed out in SWiFT, where should I put the 96?

- a. Please add the IO number to the "IO Request Comments/Notes" box in SWiFT.

19. Will foreign supplement awards receive 900 Internal Order numbers?

- a. No, new NIH foreign supplement awards will not receive 900 IOs. SPSS will create 96 accounts under the new SAP number.

20. Will the subaward agreements include automatic carryover for foreign subawards?

- a. No, foreign subaward sites will not have automatic carryover.

21. Will ORA be having a meeting with the faculty (PI's) on this topic?

- a. Faculty are always invited and welcome to attend ORA Office Hours sessions. There will be a lot of communications that go out after the government reopens and once we have more clarity about next steps. But multiple forms of communication about changes will come from ORA, School of Medicine leadership, University-wide leadership, and other central offices as well.

22. Do we need to check our foreign partners' names on the OFAC list or does ORA do that for us?

- a. This is part of ORA's review, department staff and PIs do not need to verify this information.

23. If a grant is structured as a multi-component award, with international components, do we still need to wait for the RF5/UF5 funding opportunity to be available?
- a. The RF5 and UF5 are the only mechanisms that will allow foreign subawards. If you are submitting, for example, a U54 proposal for the next cycle, you will not be able to include a foreign subsite in that proposal because they are now prohibited by NIH. The only way to submit an NIH cooperative agreement or multi-component proposal with a foreign subsite will be under the UF5 mechanism. Again, the RF5 and UF5 mechanisms have not been released by NIH yet, but we will share more information on these mechanisms once NIH provides more details.
24. Can an R01 be submitted which involves work internationally but the international component is funded by other sources, such as Foundations (non-NIH sources)?
- a. The new NIH RF5/UF5 mechanism is specific to foreign subawards, so if you have an international collaborator who is not being paid on the project, for example in an advisory capacity, they would not be subject to the new NIH policy. International consultants, who are providing a specific service on the project, but do not rise to the level of a subaward site, are also still allowable under the current framework. Please check with your ORA Grants Associate if you are unsure about the nature of the international component.
25. To confirm, regarding the research security training for subsite PIs, is a general statement like, "our institution adheres to all federal policies" acceptable given that some universities will not mandate this training until NIH does?
- a. Yes, this language is acceptable.
26. On the Multi-PI issue, will the foreign MPI be subject to the minimum effort requirements as a traditional MPI?
- a. We don't know the answer to this question yet, because these will be completely new grant (RF5/UF5) mechanisms. We await additional details from NIH and will communicate them to research community when they become available.