**New Application Structure for NIH-Funded International Collaborations**

**University Guidance – 09/16/2025**

**To**: All University Faculty engaged in or considering applying for research grants from the National Institutes of Health (NIH) and all staff involved in the administration of sponsored programs

On May 1, 2025, the NIH released notice [NOT-OD-25-104](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-104.html), “Updated NIH Policy on Foreign Subawards”. With this policy, **the NIH announced that they would no longer allow subawards to be issued to foreign entities on sponsored awards**. This policy amendment further stated that a new award structure would be announced no later than September 30, 2025 to provide a method for grantees to collaborate with foreign entities on sponsored programs.

**On September 12, 2025, that new policy was released in notice** [**NOT-OD-25-155**](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-155.html)**, “New Application Structure for NIH-Funded Collaborations”.** This guidance provides some important highlights and recommendations related to these announcements; however, anyone who is collaborating or planning to collaborate with a foreign entity on an NIH-sponsored project, or who supports such a project or project proposal, should familiarize themselves with these policies in full.

Under the new policy, **foreign collaborations will only be allowed on programs under a Notice of Funding Opportunity (NOFO) that support the new PF5 (for grants) or UF5 (for cooperative agreements) activity codes**. NOFOS that support these codes will allow institutions to submit a [multi-component application](https://grants.nih.gov/grants/how-to-apply-application-guide/forms-i/multi-project-forms-i.pdf). These applications will essentially work like a simultaneous submission – the domestic institution (UC) will submit an application containing an Overall Component (which describes the overall objectives) and a Research Component (which describes our portion of the research activity). At the same time, each foreign collaborator will submit their own International Project component, which will describe the portion of the research that will take place at that institution. Therefore, each proposal will include three or more components, depending on the number of foreign collaborators.

Important Notes regarding this process:

1. While these policies prohibit the issuance of subawards to foreign entities, they do not prohibit international travel or the hiring of consultants from outside the United States. When preparing an application that involves foreign entities, we must follow the [University’s Vendor vs Subrecipient guidance](https://researchhow2.uc.edu/docs/default-source/default-document-library/subrecipient-vs-contractor-_-purchased-service-determinations.pdf?sfvrsn=221483b0_0) in determining how a relationship should be defined**. If the foreign entity will be acting in a manner consistent with a subawardee per this guidance, they cannot be classified as a contractor or consultant, and the multi-component application must be used.** Any attempt to avoid compliance by improperly classifying a collaborator as a consultant or vendor could result in the loss of award dollars, debarment from funding, or other consequences.
2. Scientific review will be conducted for the entire project as a single unit, but if awarded the components will be disaggregated and separate awards will be issued to each entity. This will create certain advantages – there will be no need to issue subawards or manage the flow of subaward invoices, which should speed project launch and reduce paperwork during the term of the award, but the PIs and institutions must remain in close collaboration to ensure each party is on target with their portion of the project
3. Each entity involved in the project will be responsible for their own financial reporting. Progress reporting methods have not been determined yet by the NIH, and further guidance is expected.
4. In [NOT-OD-25-104](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-104.html), the NIH indicated that while this process is being launched initially only for foreign collaborators, they plan to expand it and eventually eliminate all subawards. While no timeline has been established for this, we should be prepared for an expansion of this policy in time.
5. PIs and administrators involved in the proposal submission process should familiarize themselves with the [multi-component application package](https://grants.nih.gov/grants/how-to-apply-application-guide/forms-i/multi-project-forms-i.pdf) in advance if they intend to or may be involved in a submission to the NIH that includes foreign collaborators. Given the stated preference of the NIH to eventually expand this policy, administrators who work on NIH submissions of any kind may wish to review this package.