

Eligibility Requirements for Foreign Collaborators on NIH-Funded Research

Overview for faculty provided by **RASP (JHURA & ORA)**. Last updated **5/6/26**.

See NIH [NOT-OD-25-104](#) on foreign subawards and [NOT-OD-25-155](#) on new application structure

Overview of Changes

Under National Institutes of Health (NIH) projects, JHU frequently collaborates with foreign organizations for scientific research. This important collaboration has often been funded in the traditional grant subaward/consortium structure, in which JHU issues a NIH federal subaward for a portion of the grant award to each respective foreign entity performing a unique scope of work.

The NIH [will no longer accept applications which plan to issue a subaward to a foreign entity](#).

Instead, foreign entities who intend to collaborate with JHU on NIH-funded projects will receive their own grant directly from the NIH, and maintain a direct relationship with NIH to manage and report on the grant. This is a substantial change in relationship and requires each foreign organization to complete additional registrations with the United States Government.

Under this [new funding method](#), JHU would still submit a combined proposal ([PF5 Collaborative International Research Project](#)), representing the domestic research component, the foreign organization's component(s), and an overall coordination component.

After the standard scientific review, the combined proposal will be disaggregated into its components for further evaluation. If a proposal is selected for possible funding, the NIH will request additional information from the foreign organization (Just-In-Time request, approximately nine months after submission), and the registrations described below.

Any component of the entire proposal may or may not be funded. Each organization will be direct funded with a unique NIH grant number and each organization will be independently responsible for all financial management and reporting. While foreign collaborators would still collaborate with JHU on the research, the direct funded grant from NIH would be will be labeled as an [RF2 Linked International Research Project](#).

The following resources are available to guide JHU's foreign collaborators, in navigating these changes and completing the required registrations.

Timeline

These policies have already taken effect, and no new subawards will be issued to foreign entities from newly awarded NIH proposals. If you currently collaborate with Johns Hopkins Investigators on an NIH-funded project, the next proposal submission will move to a component structure, and you should begin all required registrations right away.

If you plan to collaborate with Johns Hopkins Investigators on a future NIH research project, you should begin all required registrations as soon as possible.



At proposal submission you must:

- Have a SAM.gov [Unique Entity Identifier \(UEI\)](#)
*While PA-26-002 offers some guidance for proceeding without this identifier, it is a critical first step that should be taken before submission.
- Submit a letter signed by your Authorized Official to complete all required registrations and directly receive the final RF2 grant from NIH

At Just-In-Time (about 6-9 months after submission) you must:

- Complete a full entity registration in SAM.gov with 'active' status indicated
- Completed the entity registration in eRA Commons and affiliated Authorized Officials and Principal Investigators

At award (about 10-12 months after submission) you must:

- Completed the entity registration in GRANTS.gov

Required Registrations

1. [SAM.gov registration](#) is required.

The first step in this process is to request a Unique Entity Identifier, which you may already have. This is a quick request granted in about a day. Once assigned, you can begin the complete SAM.gov registration. A detailed [checklist](#) is available on their [website](#).

The second step is to apply for and receive a complete profile with an 'active' status. This is a complicated process, as it involves several additional steps, such as applying for an NCAGE code. Please review the checklist carefully to ensure you have time to complete all steps. It may take up to six months to complete the registration and receive an 'active' status.

The SAM.gov site offers additional resources, including their "[Entity Registration Checklist](#)" and their "[Quick Start Guide for Foreign Organizations](#)"

2. [eRA Commons registration](#) is required.

The steps of this process can be found on the [NIH eRA website](#). Once the registration is complete, assign an Administrative Official. Each of your personnel should create a personal eRA Commons account and then be [affiliated](#) with your organization. This process might take one-two days.

3. [GRANTS.gov registration](#) is the final registration required.

You must have an active SAM.gov registration to begin. This is generally a one-day process.

Project Leadership and Roles

In this new funding structure, a foreign organization should have personnel identified for the role of Project Director / Principal Investigator your portion of the research. These individuals will be identified as "[Project Leads](#)" on the PF5 proposal submission. They will become a PD/PI on the final RF2 direct NIH award.

This leadership structure allows your organization approximately nine months between the time of submission and the Just-In-Time request, to complete the required registrations. **However, if your foreign personnel will be named co-PD/PI over the entire PF5 project, then these registrations must be completed at the time of submission.**



Letter of Attestation for Submissions

At the time of submission, your organization must submit a [letter of attestation](#). This letter serves as official agreement to be the direct applicant on the future RF2 direct NIH award. This letter should state your organization understands, should the foreign collaborator application be selected for funding, your foreign organization will fill the role of direct recipient from the NIH. This letter should also state you will complete all necessary registration requirements before the award can be issued.

Resource Bank

From NIH:

- [NOT-OD-25-155](#) on new structure
- [PF5 Activity Code](#) description and opportunities
- [RF2 Activity Code](#) description and guidance
- [FAQ on Foreign Engagement](#) (check regularly, new and updates marked)

From RASP (JHURA & ORA):

- JHURA policy [page](#) on Foreign Engagement
- See [JHURA NIH Changes](#) page to download:
 - PF5 Submission Instructions
 - PF5 Matrix of Components

From SAM.gov

- Sam.gov [registration overview](#)
- Sam.gov general [checklist](#) for registration
- Sam.gov "[Quick Start Guide](#)" for foreign organizations