

PASA Guidance: International Travel

For proposals including International Travel, be sure to review the Sparta Help Text in the Compliance Section of the Funding Proposal (provided below for reference) to determine whether or not the requested activity meets NIH's definition of Foreign Component.

A foreign component is defined as the performance of any significant element or segment of a project outside the United States, either by the grantee or by a researcher employed by a foreign institution, regardless of whether grant funds are expended. Activities that meet this definition can include:

- *Subcontract to a foreign institution.*
- *Collaborations with investigators at a foreign site that result in co-authorship.*
- *Use of facilities or instrumentation at a foreign site.*
- *Receipt of financial support or resources from a foreign entity.*
- *Extensive foreign travel by grantee project staff for data collection, surveying, sampling, and similar activities (note that foreign travel for consultation is not considered a foreign component).*
 - *The involvement of human subjects or vertebrate animals at a foreign site.*
 - *Extensive foreign travel by recipient project staff for the purpose of data collection, surveying, sampling and similar activities.*
 - *Any activity of the recipient that may have an impact on U.S. foreign policy through involvement in the affairs or environment of a foreign country.*

If the International Travel does *not* meet the definition of foreign component, and **provided no other foreign activities are proposed under the proposal**, the Foreign Component question on the Sparta Funding Proposal Compliance Question and SF 424 Application should indicate “no”. In this case, International Relations Approval submitted through the International Agreement Form is not needed, however, CWRU International Travel Registration must be completed by each individual that will be traveling outside of the United States **prior to departure**.

Compliance Review

Foreign Component

1. * Does this project have a foreign component? 

Yes No

In cases where the International Travel *does* meet NIH's definition of Foreign Component, the question should be marked yes. For NIH applications, the Foreign Component Justification must be provided within the SF 424 application. For all non-NIH applications, a separate Foreign Component Justification must be included in the Attachments tab within the Sparta FP for internal review.

- In cases where **no other foreign activities are proposed under the proposal**. International Relations Approval submitted through the International Agreement Form is *not* needed, however, CWRU International Travel Registration must be completed by all individuals that will be traveling outside of the United States **prior to departure**.
- In cases where other **foreign activities are proposed under the proposal**, both International Relations Approval submitted through the International Agreement Form by the PASA Specialist *prior* to proposal submission (note, once approved by International Relations, PASA Specialist will upload approval confirmation to the Attachment tab in Sparta) **and** CWRU International Travel Registration must be completed by each individual that will be traveling outside of the United States **prior to departure**.

Compliance Review

Foreign Component

1. * Does this project have a foreign component? 

Yes No [Clear](#)

a. * If yes- list the country/countries?

Regardless of whether or not the International Travel meets the definition of Foreign Component, CWRU community members are **required to report their travel in advance of university-related international travel**. International travel reporting fulfills federal compliance obligations, enables alerts when travel is to countries with limited university insurance coverage, and enhances the university's ability to publicize our global impact and foster connections to expand that impact. With that in mind, each individual traveling outside to the United States must complete the CWRU International Travel Registration **prior to departure**.

For additional guidance, visit the International Travel page on the Office of International Affairs website.

<https://case.edu/international/international-travel>