
UPDATED REQUIREMENTS AND GUIDANCE FOR RESEARCHERS

International Research Collaborations Involving Federally Funded Awards

With Specific Attention to the NASA Wolf Amendment, NIH Foreign Component Policy, and NSF's Forthcoming Restricted-Entity Prohibition

1. Purpose and Status of This Guidance

This guidance is intended to update all CU Boulder researchers working on federally funded projects on agency-specific requirements from NASA, NIH, and NSF concerning international research collaborations, particularly those involving co-authorship or joint activity with a researcher or institution affiliated with the People's Republic of China (PRC) or other restricted entities. Each agency currently applies a distinct regulatory mechanism, and CU Boulder has decided to comply with each agency's restrictions individually rather than treating federally funded international research collaborations uniformly. This guidance also includes best practices on international research collaborations and authorship acknowledgements for all federal agencies.

These updates have been prepared by Research Security and Integrity (RSI) and the Office of Contracts and Grants (OCG) to reflect the current federal regulatory and enforcement environment. The Office of Research Security and Export Control (ORSEC) and OCG are available to support questions about individual cases as noted below. It cannot be overstated how important it is for researchers to ensure their DEPA is up-to-date and discloses all foreign collaborations, and that researchers seek guidance on any uncertain situations.

2. Why This Guidance Is Being Issued Now

Three federal agencies, NASA, NIH, and NSF, have recently enhanced enforcement or announced new restrictions on international collaboration involving PRC-affiliated and other restricted entities. These changes were reflected in the following:

- NASA: Enforcement of the 2011 Wolf Amendment has shifted following a May 2026 House Select Committee on China report, [Research Security for America's Future Space: NASA's Enforcement of the Wolf Amendment](#). This report identified hundreds of NASA-supported publications that potentially violated the Wolf Amendment due to bilateral research collaborations between U.S. and PRC-affiliated coauthors and institutions and recommended increased resources for enforcement.
- NIH: In [May](#) and [June 2026](#), NIH reaffirmed and reemphasized its foreign component policy, clarifying that most foreign co-authorship arrangements constitute a reportable foreign component requiring prior approval, and stating that NIH is increasing its oversight of foreign collaborations.
- NSF: On July 8, 2026, NSF issued a [Dear Colleague Letter](#) announcing a forthcoming policy, aligned with an approach the Department of Defense (War) (DoD(W)) adopted earlier in 2026, that will prohibit collaboration on NSF-funded projects with entities on U.S. restricted-party lists. This policy is expected to take effect in federal fiscal year 2027, which starts on October 1, 2026.

These developments mean that CU Boulder researchers who currently have or anticipate applying for federal awards from these agencies face materially different, agency-specific compliance expectations for international co-authorship and collaboration. This guidance should be treated as reflecting a fast-moving, heightened-risk period rather than a settled area of compliance. Researchers are expected to follow these agency-specific requirements and restrictions as described below. Additional guidance will be provided as the expectations become clearer.

3. Agency-by-Agency Frameworks

This section provides detailed information about NASA, NIH, and NSF's current requirements and restrictions on research collaboration involving co-authorship or joint activity with a researcher affiliated with a PRC institution or another restricted entity. Additional guidance for researchers is provided in Section 5.

3.1 NASA's Wolf Amendment

The Wolf Amendment was enacted in 2011 and prohibits the use of NASA funds to “develop, design, plan, promulgate, implement, or execute a bilateral policy, program, order, or contract of any kind to participate, collaborate, or coordinate bilaterally in any way with China or any Chinese-owned company.”

NASA grant terms and conditions require recipients (*i.e.* the university or anyone working under the award) not to “participate, collaborate, or coordinate bilaterally with China or any Chinese-owned company, at the prime recipient level or at any subrecipient level, whether the bilateral involvement is funded or performed under a no-exchange-of-funds basis,” except where NASA has granted a specific waiver. It does not matter if the collaboration is unfunded, meaning NASA restricts work with individuals affiliated with PRC institutions regardless of whether grant funds are paid to the individual or PRC institution. CU Boulder requires PIs on NASA grants to affirm their compliance with this grant term through the internal China Assurance Form included on OCG’s Proposal Submission Request (PSR) form (see OCG’s [NASA Proposal Essentials](#)). However, this internal form is not provided to NASA. PIs must understand and ensure that any researcher working under a NASA grant is subject to this prohibition on bilateral collaboration with PRC-affiliated individuals and institutions, including research associates and graduate students. This does not include those research associates and graduate students who are employees of CU Boulder.

With release of the May 2026 House Select Committee on China report, [Research Security for America’s Future Space: NASA’s Enforcement of the Wolf Amendment](#), NASA and Congress reinforced their interpretation of the Wolf Amendment. The following activities are considered prohibited bilateral collaboration, regardless of whether any funding was exchanged, and CU personnel working under NASA awards are prohibited from engaging in them:

- Co-authorship of a publication acknowledging NASA funding where one or more co-authors are affiliated with a PRC university, laboratory, or research institute.
- Joint research activity, data sharing, or coordinated experimental design with a PRC-affiliated researcher or institution, even absent a formal contractual arrangement.
- Nominally “multilateral” collaborations that are, in substance, principally bilateral engagements with a single PRC-affiliated collaborator.
- Collaboration with PRC institutions on U.S. government restricted entity lists, including the “[Seven Sons of National Defense](#)” universities.

A publication that both acknowledges NASA funding and lists PRC-affiliated co-authors, even if those co-authors did not receive NASA funding, is treated as creating a “strong presumption” that the underlying research was conducted within the scope of the funded award.

3.2 NIH Foreign Component Policy

NIH’s long-standing definition of a “foreign component” is unchanged: “the performance of any significant scientific element or segment of a project outside the U.S., either by the recipient or by a researcher employed by a foreign organization, whether or not grant funds are expended,” is prohibited without prior approval. What has changed is NIH oversight of foreign collaborations:

- NIH clarified in [NOT-OD-26-084](#) that most instances of foreign co-authorship represent a foreign component requiring disclosure, with only limited exceptions where a foreign contributor’s role is minor or indirect.
- Foreign components require prior approval from NIH through inclusion in proposals or notifying NIH during award performance prior to engaging in a foreign component. (See OCG’s [NIH Foreign Component Guidance](#).) Foreign components require disclosure in annual Research Performance Progress Reports (RPPR).

NIH states that requiring prior approval for a foreign component does not mean such components are prohibited or discouraged, however we do not have information on how NIH would react to a disclosure of collaboration with an individual affiliated with a PRC institution or other denied entity.

3.3 NSF Forthcoming Restricted-Entity Prohibition

On July 8, 2026, NSF issued a [Dear Colleague Letter](#) announcing a new, future research security policy that represents a significant change from NSF’s historical approach of considering foreign collaborations with restricted entities on a case-by-case basis. Key elements:

- NSF funds may not be used to support collaboration with organizations appearing on any of 12 enumerated U.S. restricted-party lists set out in [Appendix A](#) of the Dear Colleague Letter, including the DoD’s(W) Section 1260H List (Chinese military companies) and Section 1286 List, and the Commerce Department’s BIS Entity List and Military End-User (MEU) List.
- Senior/key personnel will be prohibited from holding an appointment or position with, or receiving research support from, any restricted entity for the duration of the NSF award, paid or unpaid, full-time, part-time, or voluntary.
- Senior/key personnel and the OCG Proposal Analysts, as authorized organizational representative (AOR), will be required to certify compliance with this prohibition to NSF at the time of proposal submission.
- The policy explicitly excludes collaborations with a University’s own former researchers, students, and postdoctoral fellows who later join a restricted entity after departing CU Boulder, including continuing collaboration with such individuals as prohibited going forward, even where the underlying project began while the collaborator was still CU Boulder-affiliated.

NSF anticipates implementation of this new policy in federal fiscal year 2027 (which starts October 1, 2026), concurrent with NSF’s updated financial assistance guidance.

4. Known Gray Areas — Consult OCG Before Proceeding

The following scenarios have been identified as unresolved or ambiguous under current guidance. If your situation resembles any of these, do not rely on your own reading of the rule. For questions at proposal stage, contact your [OCG Proposal Analyst](#). After an award is made, contact your [OCG Grant Officer](#). ORSEC will provide consultation with OCG as needed.

NIH (Foreign Component Policy)

Scenario	Why It’s Unresolved
A foreign co-authorship is discovered after a publication is already in print, with no prior NIH approval sought	NIH policy addresses prior approval going forward but is less clear on the appropriate remediation timeline and process once a foreign component is discovered retrospectively.
Foreign travel by CU Boulder personnel that is strictly for consultation, not data collection or hands-on research	NIH has clarified this generally does not constitute a foreign component, but the boundary between “consultation” and substantive collaborative work is fact-specific.

NSF (Forthcoming Restricted-Entity Prohibition)

Scenario	Why It's Unresolved
A collaboration is initiated or an award is proposed before the policy effective date with an entity that appears on a restricted-party list.	The policy is prospective, but it is unclear whether collaborations that were initiated or awards that were received before the policy effective date must be discontinued for compliance.
A collaboration is initiated or an award is proposed after the policy's effective date involving an entity that is then unrestricted, but is later added to a restricted-party list.	The policy is prospective, but the restricted party lists themselves are updated on an ongoing basis outside NSF's own timeline, creating a moving target.

5. Practical Guidance for PIs and Co-PIs

5.1 Before initiating international collaborations

- Identify all anticipated collaborators' institutional affiliations, including any PRC-based or other restricted-entity appointments, joint appointments, or visiting roles for every individual expected to contribute intellectually to the work, not just those receiving funds.
- Ensure your DEPA is accurate and up-to-date with all international collaborations disclosed.
- Check proposed collaborators and their institutional affiliations against applicable U.S. government restricted-party and prohibited-entity lists. Such screening may be required or advisable for NASA and DoD-funded activities under existing agency, research-security, export-control, and award-specific requirements. NSF has separately announced that it will prohibit NSF-funded research collaborations with entities on specified U.S. proscribed-party lists beginning in FY 2027.
- If a collaborator or collaborator's institution appears on one of the lists, consult with ORSEC on the regulations and associated risks prior to collaborating.
- For NASA proposals, review and accurately complete the NASA China Assurance form as part of OCG's Proposal Submission Request form. Individuals who are not employees of CU Boulder and who have a PRC institutional affiliation and PRC entities are prohibited from participating in NASA funded awards and should not be included in proposals or award activities.
- For NIH proposals, determine at the proposal stage whether the collaboration constitutes a foreign component and, if so, include the required Foreign Justification attachment. Do not wait to disclose after the fact. Consult with your [OCG Proposal Analyst](#) and OCG's [NIH Foreign Component Guidance](#) as needed.
- For all federal sponsors, disclose foreign collaborations. See OCG's [Disclosing Other Support](#) guidance.

5.2 During the award period

- Maintain contemporaneous records of collaboration: correspondence, data-sharing agreements, authorship discussions, and the timing of any changes in a collaborator's institutional affiliation.
- Disclose any change in a collaborator's (or your own) institutional affiliation to ORSEC within 30 days, particularly any new PRC-based or restricted-entity appointment.
- For NIH awards, seek prior approval before proceeding with a new foreign component identified after the award begins by working with your [OCG Grant Officer](#). This is a before-the-fact requirement, not an after-the-fact disclosure.
- Do not assume informal or limited-interaction co-authorship is automatically outside any of the three frameworks; each treats co-authorship with an individual with a PRC-based or other restricted-entity appointment as substantive evidence of potential foreign collaboration.
- Update your DEPA within 30 days with any change in foreign collaborations (15 days for DOE award recipients).

- For NSF awards, begin reviewing planned collaborations against the restricted party lists now, even though the prohibition is not yet in effect, given the FY2027 implementation timeline. Consult with ORSEC and update your DEPA disclosures. There may be a need for future NSF approval or contingency planning if collaboration is denied.
- Disclose foreign collaborations on progress reports such as Research Performance Progress Reports (RPPRs) as required by sponsors.

5.3 At publication and reporting

- Include the specific award number in funding acknowledgments where agency funding supported the work. Vague or general acknowledgments are flagged as a compliance risk under NASA's framework and increasingly scrutinized by NIH.
- Ensure listed co-authors' affiliations are accurate and that each listed author's actual contribution is disclosed and defensible. Affiliations should reflect where the research occurred, not where the collaborator is currently appointed. If there were to be a manuscript that results from the work that was done in your lab, before the individual received an appointment with a PRC-affiliated or other restricted entity, the accuracy of the institutional affiliations for their work is very important. In this case, you would want to cite with an asterisk that their current appointment is at the institution in China, which indicates that that foreign institution did not contribute to the project.
- If a past publication is identified as containing an inaccurate affiliation or funding acknowledgment, contact your Department Chair or Institute Director for guidance and self-correct with the journal editor as applicable.

6. Responsibilities of Department Chairs and Institute Directors

- Ensure faculty and postdoctoral researchers supported by NASA, NIH, or NSF funding are aware of this guidance, particularly those with existing or historical PRC-affiliated or restricted-entity collaborators.
- Route any known or suspected gray-area scenarios (Section 4) to OCG and ORSEC.
- Support, rather than discourage, proactive disclosure. The current enforcement environment penalizes concealment and inaccurate certification far more heavily than a disclosed, reviewed collaboration that is ultimately restructured or discontinued. When in doubt, disclose.
- Departments and institutes are encouraged to start department/institute-level bibliometric review of publications (typically through 2019) with PRC or restricted-entity research partnerships to ORSEC. If publications with PRC or restricted-entity research partnerships are identified and have not been disclosed, on the DEPA already, notify ORSEC.
- For units with NSF funding, begin assessing current personnel appointments and collaborations against restricted party lists ahead of the FY2027 effective date, rather than waiting for the policy to take effect. Contact ORSEC with any concerns.

7. What This Guidance Does Not Cover

This guidance addresses NASA, NIH, and NSF funded activity specifically and best practices for researchers working under federally funded awards generally. It does not address [export control \(ITAR/EAR\) restrictions](#), which apply regardless of funding source; NSPM-33 research security disclosure obligations generally; DoD(W) or DOE restricted-party requirements; or Department of Education Section 117 foreign gift and contract reporting. RSI and OGC can advise on any of these in parallel where a collaboration touches more than one funding source or agency.

8. Using the DEPA as a Disclosure Mechanism

CU Boulder maintains an established mandatory disclosure process that is the primary vehicle for reporting affiliations, foreign appointments, and external activities discussed in this guidance across all three agencies: the [Disclosure of External Professional Activities \(DEPA\) form](#), administered by RIO's COIC Office.

- All Investigators, faculty of any rank or track, PRAs, research associates and assistants, and any other personnel responsible for the design, conduct, or reporting of research are required to submit a DEPA annually (January 15-March 31) and to update it within 30 days of any change in circumstances. DOE requires updates within 15 days. Do not wait for the next cycle to report changes.
- A submitted DEPA is a prerequisite for proposal submission and a reviewed DEPA is required for accepting a new award or award modification through CU Boulder, which makes the DEPA a natural, already-mandatory checkpoint for capturing PRC-affiliated or restricted-entity appointments, foreign talent recruitment program participation, and other external activities relevant to the Wolf Amendment, NIH foreign component, and (prospectively) NSF compliance.

Important: Submitting a DEPA disclosure does not resolve compliance questions or authorize a collaboration to proceed. It is the documented starting point that allows RSI, in consultation with OCG, to evaluate the activity against current federal guidance, particularly the gray-area scenarios in Section 4. PIs should update the DEPA, especially where NIH prior approval is required or NSF restricted-entity screening is warranted. Questions about DEPA submission, scope, or timing can be directed to the COIC Office at coi@colorado.edu.

10. Escalation and Support

Any CU Boulder researcher with a question about a specific collaboration, publication, or certification under any of the frameworks described in this guidance or otherwise should contact ORSEC (orsec@colorado.edu) before acting. Proactive, complete disclosure and review materially reduce institutional and individual risk.

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