**THE GEORGE
WASHINGTON
UNIVERSITY**

WASHINGTON, DC

International Research Toolkit

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International Research Toolkit Introduction

GW is committed to expanding research and scholarly activities through international activity. Sponsored projects can be considered international when any one of the following criteria is met:

- ✓ an international sponsor
- ✓ travel to an international location to conduct research
- ✓ an international sub-recipient
- ✓ activity at an international location
- ✓ a contract with a consultant or employee at an international location for work that may or may not take place outside the U.S.
- ✓ hire of an employee from an international location.

With international research, it is important to **plan ahead** and to know best practices, relevant policies and laws, and/or other complexities that may need to be considered. It is also important to know that there are resources available to help navigate some of these complexities. This toolkit is designed to provide a list of factors to consider when contemplating international research activity, along with available resources and relevant policies that are pertinent to various aspects of international research.

Part 1 of this Toolkit outlines a list of factors to consider in the proposal and/or budget planning process. Part 2 of this Toolkit addresses the negotiation process for agreements related to international research activity. Part 3 of this Toolkit outlines a number of considerations to keep in mind during the management of international research activity including: data sharing, export controls, hiring foreign personnel, legal considerations, issuing payments to international entities, making international purchases, tax obligations and travel. Part 4 of this Toolkit outlines additional resources available to aid in the planning and management of international research activity.

Part 1: Preparing for International Research: Proposals and Budgets

When preparing a proposal, it is important to consider all applicable costs and to provide the necessary justifications for those proposed costs. For complete guidance on your particular project you should consult with your pre-award SPA and refer to the sponsor guidelines. Some common items you might want to consider are:

- □ **F&A Rate**: For proposals to federal sponsors, when considering which F&A rate to use (on-campus, OSA, or off-campus), one of the first key factors to consider is where the preponderance of the work will occur. For example, if the PI is located and will complete the preponderance of the work in Foggy Bottom, then the Foggy Bottom on-campus F&A rate must be used. For further clarification, please refer to the University's F&A rate guidance, or consult with your SPA.
- □ **Insurance (for Business Purposes)**: When conducting sponsored projects abroad it is possible that you might have to budget for additional insurance for you and your researching team, as well as your equipment.

- □ **Mobile Device and International Calling Plans**: Because the activity will be done outside of the US, special and unique circumstances apply for some sponsors and this may be an allowable expense. If your sponsor allows it and this is an expense on your budget, you can discuss possible plans with Procurement.
- □ **Per Diem**: While the university does not use per diem generally, for sponsored projects that require international travel and extended stay this could be an allowable that you should budget for if you first receive special approval from the appropriate Vice President. For more information you can refer to the Sponsored Projects website.
- □ **Shipment and Mailing**: If your research will require shipping and mailing to another country or to the US these cost are typically allowable and should be included in your budget. Additionally, to ensure compliance with university and government guidance on export control, there could be special clearance needed from the university or a Federal Agency. For more information you can refer to the Export Control website.
- □ **Subrecipients**: GW requires that subrecipients provide detailed budget information and a detailed budget justification. The Subrecipient Commitment form must be completed at the proposal stage. To avoid delays in applications, please give subrecipients adequate notice to complete the form.
- □ **Translator**: If translation services will be required for project activity, this contractual service should be included in your budget and contracted for through Procurement. For more guidance please refer to the sponsor requirements.
- □ **Travel**: All foreign travel should be included in the proposal and should be distinguished from domestic travel. Please check sponsor's definition of foreign travel. Depending upon the destination, additional costs may need to be budgeted for security, extraction and gap insurance coverage. Federally-funded projects impose specific restrictions on air carrier selection for faculty, staff and students. For more information, see the Fly America Act reference on the International Travel section of the Office of Sponsored Project's website. Furthermore, students may need approval for some travel destinations, for more information, refer to the International Travel Policy.
- □ **Vehicles**: When a vehicle is required for business purposes at foreign locations, the cost of the vehicle, fuel and oil, maintenance, customs or duty fees for the vehicle, and or vehicle storage fee may be allowable. For more guidance on allowable costs please refer to the sponsor requirements.
- □ **Visas**: It is your responsibility to contact the appropriate agencies and determine visa requirements. If a visa is required for your sponsored project activity, the cost associated with acquiring a visa is not always an allowable cost. For more guidance on allowable costs please refer to the sponsor requirements.

Other considerations at proposal stage include:

- □ *Should the proposed work be classified as a subaward or as an independent contractor?*
  - ➢ GW's Subrecipient Checklist can be completed to help make this determination

☐ *Is the subrecipient capable of completing the technical and administrative work required to complete the project successfully?*
  ➢ The [Subrecipient Commitment Form](#) is designed to aid with this assessment
☐ *Are any of the key personnel/collaborators from international locations?*
  ➢ International and subrecipient key personnel are required to complete sponsor requirements for COI, FCOI, CITI, HIPAA, etc. These processes should be started early in the proposal process to ensure ample time for completion.
☐ *Will the research activity require transfer/transport of data to/from international locations?*
  ➢ You can start planning for this type of activity early by reaching out to DIT Information Security (infosec@gwu.edu) to discuss required technologies, data management plan and what costs may need to be built into your budget

Part 2: Negotiating Agreements for International Research

Due to potential language and cultural barriers, International agreements typically take longer than average to negotiate and execute.

International Sponsors: Agreements with international sponsors are scrutinized more carefully for award terms. It is important to clearly state the deliverables within the Statement of Work to alleviate miscommunications during the project performance period. Additionally, it has become common for international sponsors to require that the award be audited. The cost for this audit should be included in the budget and charged to the award. International sponsors frequently request to pay in their home currency which can create gain/loss considerations for the GW. A document and process on [Foreign Currency Awards](#) has been created by Grants and Contracts Accounting to review and consider how the PI and the respective Finance Director may want to manage these requests.

International Subagreements: GW uses the [Subrecipient Commitment Form](#) (completed at proposal) along with the [Financial Status Questionnaire International/For Profit](#) completed by the Grants and Contracts Accounting Services (completed before award is received by GW) to assess international sub-awardees. This may result in increased monitoring of subaward activity and invoicing throughout the life of the project.

Part 3: Managing International Research Activity

A. Data Sharing

If your research project involves oversees travel and/or sharing data with a person or entity in another country, you may need to complete the [Record of Export Control Review Questionnaire](#), in order to determine if added security measures are required. If you have any questions, please contact the [Export Control Office](#) at rescomp@gwu.edu.

If you are traveling to an international location with a computer or electronic device with sensitive data, please arrange with the Department of Information Technology through ithelp@gwu.edu to obtain a loaner laptop so you can download only what you need and avoid travelling with all your stored data and files that that may be sensitive and are not needed for your trip. Please also review the Export Control considerations guidance and contact the Export Control Office with any questions.

B. Engagement of Foreign Personnel

Certain laws and operational considerations may apply when University employees are sent overseas on research projects and when the University engages persons overseas to perform services for GW in foreign countries. The University's process for vetting and review of such requests is available on the University Human Resources' website and begins within the relevant school, with school research administrators serving as point persons for such requests.

C. Export Controls

The export of certain commodities, information technologies, software and services is regulated by the United States Export Control laws for reasons of national security, foreign policy, prevention of the spread of weapons of mass destruction and for competitive trade reasons. These laws restrict such commodities, information, technologies, software and services that can be transmitted overseas to individuals, including U.S. citizens, or made available by a "deemed export," which is a release of controlled technology or software source code to foreign nationals on U.S. soil. Prior written authorization (a "license") from one or more U.S. government agencies may be required to carry out certain sponsored projects or other educational activities involving specified technologies or certain countries, if an exemption or exclusion is not available. It is the policy of the university to comply with U.S. export control laws. It is the responsibility of faculty, staff and students to be aware of and comply with these laws and the university's written instructions and procedures. Export Control procedures and related forms are available on the university Export Control website.

D. Legal Considerations

It is the policy of the University to comply with U.S. laws and regulations applicable to the University's overseas activities. Please see the University's *Compliance with Laws When Conducting University Activities Overseas Policy*, which addresses U.S. laws related to Anti-Bribery, Economic Sanctions, Participation in Unsanctioned Foreign Boycotts, and Anti-Terrorism. This policy is available here.

It is also the policy of the University to comply with applicable foreign laws of the host country or countries in which University activities are to take place. Certain activities abroad may trigger the applicability of local laws. Please consult with OGC as necessary through your appropriate contacts in OVPR.

E. Payments/Fees

Conducting business transactions in foreign countries or with foreign entities creates unique challenges for the payment process. Different forms, payment methods and payment terms may be required to remain compliant with all local, national and international laws. Learn how to stay compliant by familiarizing yourself with all the international payment policies. One policy that is worth noting is the University's policy on providing checks for foreign transactions. The University does not issue checks for individuals abroad, thus you must have bank information to pay foreign entities. To ensure efficient and effective international transactions, please contact Procurement & Travel Services and Accounts Payable in advance of your transaction.

F. Purchasing

Equipment: The University defines Equipment as an article of nonexpendable, tangible personal property having a use life of more than one year and an acquisition cost which equals or exceeds the lesser $5000. Equipment purchased with sponsored funds must be used for the purpose for which it was purchased according to the grant or contract. It cannot be used for other sponsored projects or for general use. For guidance on purchasing equipment abroad, and for more information on the procurement process contact Procurement or refer to the Procurement Manual, and refer to your sponsor's guidelines.

Services (Consultants): A consultant is an individual receiving payment from GW for a service.

Conducting business transactions in foreign countries or with foreign entities creates unique challenges for ensuring our suppliers are paid properly. Different forms, payment methods and payment terms may be required to remain compliant with all local, national, and international laws. To ensure efficient and effective international transactions, please contact Procurement and Accounts Payable in advance of your transaction.

G. Taxes

The tax implications of setting up programs and activities overseas can be extremely complex, and vary widely from one country to another. Before embarking on international activities, you should consider the tax issues and plan appropriately with your department's financial director to avoid unexpected tax obligations. For additional guidance please refer to the tax section of the Global Operations [website](#).

H. Foreign Travel

Additional information about foreign travel, including the Unversity's International Travel Policy and an overview of insurance coverages in place for GW employees' foreign travel can be found on the GW International [website](#). Check out the resources section and the GW Policies section at the end of this guide for links to U.S. State Department, travel booking and other GW websites to aid with international travel. To be compliant with the [Fly America Act](#), faculty, staff and students traveling for Federally-funded projects must use U.S. flag air carriers, when available, for all air travel and cargo transportation services. The University iBuy tool automatically checks that itineraries are compliant with the necessary requirements, and prompts you when they are not. For information on iBuy please refer to their [website](#).

Part 4: Applicable Policies and Resources Available at GW

GW International	https://international.gwu.edu/	Go here to register for international health insurance coverage, print an emergency contact card, learn more about traveling with students, and GW travel policies and resources
International Services Office	https://internationalservices.gwu.edu/	This is the office for students and employees who will be coming to work at GW. They provide expertise related to visas and provide services for international students coming to GW
Export Controls	https://research.gwu.edu/export-controls	Refer to this link for more information on Federal guidance and University policy on export controls.
International Hires and Placements	https://hr.gwu.edu/international-hires-and-placements	Learn the process for engaging personnel at international locations
Global Operations	https://finance.gwu.edu/global-operations	A centralized location to learn about resources and/or processes applicable to global operations, primarily from various GW finance offices
Travel	https://ibuy.gwu.edu/travel-services	Book travel to international locations by utilizing GW's online travel agency. This service ensures that the flight you are selecting is compliant with the Fly America Act.
International Travel Insurance Assistance	https://risk.gwu.edu/international-travel-insurance-assistance	Learn more about HTH Worldwide, the insurance provider for GW faculty, staff and students traveling abroad
Fly America Act	https://research.gwu.edu/travel#FlyAmericaAct	Travel to foreign countries supported with federal grants and contracts is subject to this law

Other Available Resources:

State Department Country Information	https://travel.state.gov/content/passports/en/country.html	Information on visa requirements, security, and medical considerations
State Department Smart Traveler Enrollment Program	https://step.state.gov/step/	A free service to enroll your trip with the nearest U.S. Embassy or Consulate
State Department Travel Warnings	https://travel.state.gov/content/passports/en/alertswarnings.html	Travel warnings and alerts issued by the U.S. State Dept.
HTH Worldwide Risk Ratings	https://www.mpassport.com/georgewashington.cfm	To access destination-specific risk ratings
CDC Travel	http://wwwnc.cdc.gov/travel/	Find Travel Health Notices and recommended vaccinations for travel to various international locations

GW Policies:

International Travel Policy: http://my.gwu.edu/files/policies/InternationalTravelApprovalFINAL.pdf

Travel, Entertainment and Business Expense Reimbursement Policy:
http://my.gwu.edu/files/policies/TravelEntertainmentFINAL.pdf

Export Control Policy: http://my.gwu.edu/files/policies/ExportControlFINAL.pdf

Compliance with Laws when Conducting University Activities Overseas:
http://my.gwu.edu/files/policies/CompliancewithUSLawsOverseasFINAL.pdf

International Travel Insurance Policy: http://my.gwu.edu/files/policies/IntlTravelFINAL.pdf