

## **Center for Lung Biology and Disease Plan for Compliance with NIH Policy on Foreign Coauthored Publications**

1. The Center for Lung Biology and Disease (CLBD) will post formal guidance on its website stating that authorship decisions must be based solely on scholarly contributions and must comply with all federal sponsor requirements. This guidance will align with the NIH Notice of Award and all applicable Notice of Funding Opportunity requirements, including those related to foreign components as defined in the NIH Grants Policy Statement for IDeA awards. It will explicitly clarify that publications coauthored with individuals holding foreign affiliations must not reference or acknowledge the NIGMS award supporting CLBD.
2. The guidance will be incorporated into all subaward agreements for pilot and research project leaders. These agreements will require investigators to submit all manuscripts for CLBD review prior to journal submission by emailing [tammydugas@lsu.edu](mailto:tammydugas@lsu.edu). When feasible, investigators may also be instructed to seek prior NIH approval for publications involving foreign coauthors supported by CLBD funds.
3. All CLBD-sponsored meetings, whether conducted in person or remotely, will include reminders that compliance with this guidance is mandatory for all CLBD-funded research activities.
4. CLBD Multiple Principal Investigators (MPIs) will closely review, monitor, and audit all required documentation, including Other Support disclosures, and publications as they become available through PubMed Central.
  - Any failure to comply with NIH Grants Policy requirements will result in corrective actions communicated directly to the investigator, the appropriate institutional representative, and/or NIH, as appropriate.
  - Noncompliance related to foreign components will be addressed through a tiered approach: (1) education and correction, (2) a formal warning accompanied by mandatory additional training, and (3) suspension of CLBD funding if the issue remains unresolved.