

# **EXHIBIT 17**

## Reminder of Compliance Requirements for NIH Extramural Recipients Related to Renegotiated Aims, Objectives, Titles, and Abstracts

**Notice Number:**

NOT-OD-26-007

### Key Dates

**Release Date:**

November 18, 2025

### Related Announcements

None

### Issued by

NATIONAL INSTITUTES OF HEALTH (NIH)

### Purpose

Reminder to NIH awardees that changes in scope represent new terms and conditions, with which recipients must comply. This reminder applies to grants, cooperative agreements, and other transactions.

#### Background

NIH grants management staff are responsible for the business management of awards, which has always included negotiating grant budgets and scope, where appropriate. NIH GPS, 2.1.1. A change of scope is a change in the direction, aims, objectives, purposes, or type of research training, identified in the approved project. NIH GPS, 1.2. This can include changes to Aims, Objectives, Titles, and Abstracts. One type of scope change that has arisen beginning with Fiscal Year (FY) 25, is a change to bring an NIH funded grant, cooperative agreement, and other transaction into alignment with NIH's agency priorities. For details related to NIH's priorities effective August 15, 2025, please see the [NIH Director's Statement of Priorities](#), entitled "Advancing NIH's Mission Through a Unified Strategy."

#### Policy

NIH seeks to remind awardees that all changes in scope that were agreed upon by NIH and the Authorized Organizational Representatives (AOR) become new terms and conditions of award, and the recipient must comply with those changes. This includes changes in scope that were renegotiated to align with the agency's priorities. As such, NIH fully expects recipients to comply with the new terms and conditions, unless otherwise stated in the Notice of Award, or unless NIH has been enjoined by court order from imposing or enforcing such terms while that court order is in effect. If recipients have questions related to the new terms and conditions of the awards, the recipient must seek clarification from the Grants Management Official, prior to drawing down on the funds. Once the funds are drawn down from the HHS payment system, the recipient agrees to the terms and conditions of the award and must fully comply with them.

Please be advised that if NIH discovers that recipients have not complied with the new terms and conditions of their award, NIH can immediately take an enforcement action under 2 CFR 200, as appropriate, which includes termination for non-compliance under 2 CFR 200.340(a)(1). For terminations for non-compliance with the revised scope, NIH will provide appeal rights to recipients at the time of the termination and, in accordance with [2 CFR Part 200.340 \(c\)](#), will report the terminations in SAM.gov, as appropriate.

### Inquiries

Please direct all inquiries to:

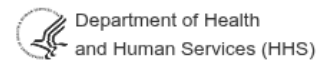
NIH Office of Policy for Extramural Research Administration/OER

[OPERAleadership@mail.nih.gov](mailto:OPERAleadership@mail.nih.gov)

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