

Frequently asked questions on NASA China PI and team member certification for grant proposals and award

1. QUESTION: Question No. 2 of the current NASA China Certification, which all NASA PIs are required to answer, contains this question: *“Do you have any active collaborations or other work-related relationships (paid or unpaid) with individuals who are employed by or acting on behalf of China, a Chinese-owned company, or any Chinese research institute, university, or government unit?”*

Could you define “collaborations or other work-related relationships?” For example, which of the following is considered relevant and requires a report: funding proposals, journal reviews, organizing conferences/workshops, serving/volunteering on national and international professional organizations with members from China, book writing, paper writing, email exchanges on research discussion, answering public data/model questions?

ANSWER: NASA is broadly interested in knowing about collaborative activity between researchers on NASA grants and persons affiliated with China, Chinese institutions, or Chinese businesses. Many such relationships are permissible under NASA’s China-funding restrictions, but should be disclosed to the Office of Sponsored Programs (OSP) so that it can review whether they comply with those funding restrictions, and whether and how they should be disclosed to NASA. OSP will consult with University leadership to assess whether the collaborations and other work-related relationships comply with funding restrictions and make further determinations prior to submitting proposals to NASA. To facilitate University leadership’s decision-making process, PIs and team members should take a broad and inclusive disclosure approach.

For the purposes of this Question, you should consider if the activity involves an affiliation or collaboration with persons associated with the Chinese government, including universities and business entities. If so, it should be disclosed.

Any funding proposal, or current book writing, research, or preparation of journal articles or other writings with persons affiliated with China should be disclosed, even if unrelated to a proposed or existing NASA-funded project.

The review of journal articles co-authored by persons affiliated with China only needs to be disclosed if (a) the journal is based in or affiliated with China, or (b) the review activity is or will be funded by NASA.

Activities involving attendance at, or organization of, multinational conferences and workshops do not need to be disclosed simply because persons affiliated with China are participating. Similarly, there is no general duty to disclose work in international professional organizations that have members from China. However, in both situations, such activities should be disclosed if the conference, workshop, or professional organization is organized or sponsored by a Chinese entity, or involves bilateral scientific collaboration with persons at such entities.

You are not required to disclose general scientific discussions with persons in China on public data/model issues, as long as the discussions do not involve bilateral collaboration in research. If they do involve possible or future bilateral collaboration, they should be disclosed.

You are not required to disclose the use of data from China that is publicly available. However, you must do so if information is provided by China pursuant to an agreement for access to data.

2. QUESTION: Will answering “Yes” on any of the certification questions preclude me from submitting a proposal?

ANSWER: A “yes” answer will not automatically preclude proposal submission, but it will be discussed between the PI, unit administration, OSP, University leadership, and George Mason counsel, if necessary. The PI will be advised on whether to include information in the proposal or to NASA pre-award.

3. QUESTION: Why is “unpaid” work required to report by GMU?

ANSWER: Collaborations can happen in paid or unpaid work. Nothing about the NASA China-funding restrictions is limited to paid work. The Government specifically requires reporting to include unpaid work and roles.

4. QUESTION: For PI Question No. 2, can you define “individuals who are employed by or acting on behalf of China, a Chinese-owned company, or any Chinese research institute, university, or government unit”? The difficulty for PIs is how to determine if a collaborator is “acting on behalf of China”? Do we need to ask all collaborators if they are employed by China or “acting on behalf of China” before engaging any collaborations?

ANSWER: You do need to ask proposed collaborators on a NASA-funded project if they are employed (full, part-time, or in any other paid or unpaid roles) by or affiliated with the government of China, a Chinese university, or a Chinese business.

If the PI is aware of any collaborators on other projects besides the NASA-funded project, who have any professional affiliations with China (i.e. that including those affiliated with a Chinese talent program), that must also be reported.

5. QUESTION: The certification form for Individual Information Question No. 1 contains the note “This would include funding to a George Mason University research center, institute, or group of which you are a member.” I am concerned about the word “group.” Specifically, does this mean that I need to attest that neither I nor *anyone in PIs group* receives funding or support from China or a Chinese research unit? In other words, it may be insufficient to attest that I *personally* do not receive funding, but rather I have to attest neither I nor ***anyone in any group in which I work*** receives funding from China, which requires me to ask everyone in the group about their funding situation.

ANSWER: The certification in Individual Information Question No. 1 is asking whether you, personally receive funding or other support from China either as a direct funding recipient as well as anything funded under the auspices of a George Mason center, institute, or other group. You do not need to certify on behalf of or about all members of a group in which you are a member.