

I. OVERVIEW OF NSPM-33 Research Security requirement in Pre-Award

A. Important Dates:

- Government wide implementation date required in NSPM-33 was August 8, 2024.
- **NSF**: MFTRP certification requirements effective for all research proposals submitted on or after **May 20, 2024**. Use of SciENcv required for current and pending and biosketch forms
- **NASA**: MFTRP certification required as of **October 1, 2024**. NASA current and pending and biosketch forms include MFTRP certification.
- **USDA**: Effective **August 7, 2025**, the USDA requires all senior/key personnel on USDA-funded projects to annually certify they are not participating in a "Malign Foreign Talent Recruitment Program" (MFTRP). USDA requires SciENcv (USDA version) current and pending and biosketch forms with MFTRP certification.
- **DOE**: MFTRP certification requirements for funding opportunities published on or after **January 1, 2026**, Covered individuals on DOE applications and projects will generate Common Forms via the Science Experts Network Curriculum Vitae (SciENcv) system
- **NIH**: MFTRP certification requirements, using SciENcv generated current and pending and biosketch forms for proposals submitted on or after **January 25, 2026 with leniency period through May 2026**

B. Summary of Agency Requirements

	Biosketch and/or C&P Common Forms:		Internal MFTRP Cert Form
	<i>Required</i>	<i>Not Required</i>	
Other Federal Agencies	If Yes, MFTRP upload	If no, use internal form	YES
NSF	MFTRP upload	N/A	N/A
NASA	MFTRP upload	N/A	N/A
USDA	MFTRP upload	N/A	N/A
DOE	MFTRP upload	N/A	N/A
NIH	Biosketch only for proposals C&P for JIT and RPPRs	N/A	N/A

Summary: Use the Internal MFTRP Cert Form for all federal **research** proposals whenever a Common Forms Bio or CP is **not** required in the application

C. Version and Process Updates History

- 1/5/26 – Removal of requirement to send MFTRP ancillary review to ORIA
- 2/23/26 - MFTRP Process Updates– introduction of MFTRP certification form for federal proposals that do not require a biosketch or current and pending form.

D. Purpose:

Section 10632 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19232) contains both an individual certification requirement (individuals designated as senior/key persons on a research proposal) and an

organizational certification regarding participation in malign foreign talent recruitment programs (MFTRP). Every federal agency was required to have certifications in place by August 8, 2024.

NSF was the first agency implementing this requirement, effective for all research proposals submitted on or after May 20, 2024. Subsequent to NSF, the Department of Energy, NASA, USDA, and NIH have issued guidance and requirements around MFTRP certifications by key personnel and submitting organizations. While not all Federal agencies have issued guidance or adopted the Common Forms for biosketch and current and pending, the NSPM-33 deadline to implement certification requirements was August 8, 2024. Therefore, Mason has implemented a process to review all federal research funding opportunities for this requirement and conduct Malign Foreign Talent Recruitment Program (MFTRP) security reviews for federal research proposals. This ensures Mason is in compliance with Federal law and guidance.

In Mason's examination of the CHIPS and Science Act of 2022, as well as federal agency guidance, it is clear that this certification requirement only applies to research proposals. Therefore, instruction, other sponsored activities, and IPA proposals and awards will not be subject to the MFTRP security reviews.

II. Malign Foreign Talent Recruitment Program (MFTRP) Security Check Requirements

OSP will ensure that MFTRP reviews and certifications are completed for all federal **research** LOIs, pre-proposals and full proposals it submits. With each Federal application submission, there are two MFTRP requirements: 1) all individuals identified as senior/key personnel, at both Mason and its subrecipient entities, attest that they are not party to a MFTRP; and 2) an organizational certification that Mason has a process to ensure that all individuals identified as senior/key personnel have been made aware of and have complied with their responsibility to certify that they are not a party to a MFTRP.

The Office of Research Integrity and Assurance (ORIA) has developed a process to meet the organizational due diligence requirements that verifies individuals are not party to a malign foreign talent recruitment program. OSP and ORIA collaborate in carrying out the requirements for MFTRP individual and organizational certifications.

To comply with federal requirements, all federal research proposals must have a signed MFTRP certification from each key personnel member.

- a. This certification is included in the signed certification at the bottom of the biosketch or current and pending Common Forms generated from SciENcv.
- b. If use of SciENcv is not required, usage of a signed biosketch and/or current and pending Common Forms in the proposal satisfies the requirement for MFTRP certification and the standalone Mason certification form is not required.
- c. If the funding opportunity does not require a current and pending or biosketch form, then key personnel may use the [Mason-created standalone MFTRP](#) certification form for their MFTRP certification.

The Departmental Research Administrator will save these documents in RAMP to maintain a record of compliance. Below is the business process to follow for pre-award MFTRP security check, as well as the post-award MFTRP requirements. If you have any questions, please contact OSP for assistance or guidance.

III. Mason’s Malign Foreign Talent Recruitment Program (MFTRP) Security Check Business Process

NOTE: The Addendum on NASA China Restriction Certification has been moved to a standalone document on OSP’s Research Security webpage.

A. Stage: Prior to Department Review - Department Research Administrator (Administrative Contact) responsibilities

1. Check in RAMP to see if Research is selected under Question 7 on the General Proposal Information page. *If Research is selected, no matter which subarea is selected, the MFTRP requirements apply.*

7. * Primary purpose of this project: ?

- Research
 - Instruction
 - Other Sponsored Activities
 - Intergovernmental Personnel Act (IPA) Award
- [Clear](#)

2. Review the Funding Opportunity—including any pass-through documents—and their table of contents for KEY words related to research security (e.g., foreign influence, malign or sponsored foreign talent/recruitment, foreign governments, NDAA requirements) and verify whether MFTRP certifications have been added.
 - a. All NSF, NIH, DOE, and USDA research proposals require the use of SciENCv Common Forms, which include the MFTRP certification. NASA does not require the use of Common Forms.
 - b. If other agency-specific certification documents are required, please ensure PI completes them, and these are uploaded to RAMP along with a comment indicating there is an agency-specific form or certification, not just the Common Form.
 - c. If there are no agency-specific forms, please use the [OSTP Common Forms](#) for biosketches and current and pending, or if they are NOT required, use [Mason’s MFTRP certification form](#) and follow the process in Step 4 below.
3. **If biosketches and/or current and pending are required** for LOIs, pre-proposals, or full proposals:
 - a. Flatten and combine all key personnel documents into a single document entitled **MFTRP FPXXX PI name Sponsor**. Upload to FP>Attachments.
 - i. Please include Subrecipient key personnel documents in this PDF.
 - ii. Consultants should not be included as key personnel; however, in the rare event consultants are named as key personnel, include with Mason and subrecipient documents.

Budgets	SF424 Summary	History	Reviewers	Attachments
Name				
Full Proposal FP3210 Luke NSF.pdf				
Indirect Split FP3210 Luke NSF.xlsx				
Luke Biosketch				
Mathematical Biology _ NSF - Solicitation.pdf				
MFTRP FP3210 Luke NSF.pdf				
NSF Checklist FP3210.pdf				
SOW FP3210 Luke NSF.pdf				

4. **If biosketches and current and pending forms are not required** by the Sponsor:
 - a. All Mason key personnel (including subrecipient key personnel) must complete [Mason's MFTRP certification form](#). Please combine these into a single document entitled **MFTRP FPXXX PI name Sponsor**. Upload to FP>Attachments.
5. **If George Mason is the subrecipient**, the MFTRP certifications are still required to be signed, combined, and saved, as outlined above. If our pass-thru sponsor has a form required, depending on the wording, it may be that both the PI and AOR sign. Please share forms with your OSP specialist and/or the OSP team manager for guidance. If the form is just the organization certification only, the OSP Pre-Award Director is the signatory.
6. **Subrecipients to Mason** must provide biosketches and current and pending forms if required under the RFP/FOA for the MFTRP review. If biosketches and current and Pending forms not required, the Mason MFTRP certification form is required to be signed and provided to Mason before the proposal deadline. Subrecipients may use their organization's own certification form so long as it has matching MFTRP certification language.
 - a. For ALL Mason subrecipients (including FDP), please have them include the following in their cover letter providing the organizational MFTRP certification:

In accordance with Section 10632 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19232), I certify that all individuals identified as senior/key personnel have been made aware of and have complied with their responsibility under that section to certify that the individual is not a party to a malign foreign talent recruitment program.
 - b. **If a subrecipient will not provide** biosketches, current and pending forms, or the signed Mason MFTRP certification, for key personnel, please request a copy or link to institutional policies and procedures regarding MFTRP reviews so we can ensure a review is occurring. A copy of the policy should be combined and uploaded as the MFTRP attachment. Then, notify OSP Grants Administrator so the issue can be escalated to ORIA.
 - c. **If the subrecipient will not include the organizational certification** in their cover letter, please request a copy or link to institutional policies and procedures regarding MFTRP reviews so we can ensure a review is occurring. Please notify the OSP team manager so the issue can be escalated to ORIA.
 - d. **Subrecipient noncompliance will be escalated to ORIA.** These situations will be evaluated by ORIA on a case-by-case basis. ORIA will provide guidance to OSP as to whether proposal can be submitted and what action steps need to be taken.
 - i. If the lack of required certifications is due to the late submission of proposal documents, this reason must be noted when transmitting the issue to ORIA so that appropriate guidance can be provided on next steps prior to the deadline.

B. Stage: Specialist Review - OSP Specialist responsibilities

1. Ensure the MFTRP certifications are complete and uploaded to RAMP using naming convention.
2. **See Department Research Administrator (Administrative Contact) responsibilities** above, specifically:
 - a. Federal research proposals, including pass-thrus, include MFTRP certifications for all key Mason and subrecipient personnel under FP>Attachments, where:
 - SciENcv biosketches and current and pending Common Forms are required for submission
 - Common Form biosketches and current and pending Common Forms are required for submission
 - Where biosketches and current and pending NOT required, [Mason's MFTRP certification form](#) is uploaded
 - b. Subrecipient MFTRP certifications are complete for key personnel and the organizational certification language is included in a cover letter

C. Stage: Post Award, Award Set up, Annual Report - OSP Post Award Research Administrator responsibilities

1. OSP Post Award RA will add a deliverable for the NSF annual report and will include a reference to the annual MFTRP requirement. The deliverable will include the following language: “MFTRP Re-certification is required annually for the duration of the award. When you log into Research.gov a certification request will pop-up when the certification is due. The certification is for each individual, it is not award specific. Additionally, updated current and pending (other) support must be uploaded to NSF when annual and final progress reports are submitted if there are changes. Please work with unit administration on current and pending updates if needed. If you do answer yes to the question in the annual report of whether there are changes to current and pending, you must contact the Research Security office at rsp@gmu.edu before signing the MFTRP certification and submitting the RPPR.”
2. Note: in research.gov, only the PIs will be able to see the NSF certification and whether they signed. OSP will not have access to this information in research.gov.


Stage: Post Award, Annual Re-certification

1. MFTRP Re-certification is required annually for the duration of the award, however there is no direct role for Department Research Administrators or OSP. Each federal agency is in the process of issuing guidance regarding annual certification.
2. For NSF, when a PI logs into Research.gov a certification request will pop-up when the certification is due. The certification is for each individual, it is not award specific. Additionally, updated current and pending (other) support must be uploaded to NSF when annual and final progress reports are submitted if there are changes. The PI will work with Department administration on current and pending updates if needed. If a PI does answer yes to the question in the annual report of whether there are changes to current and pending, the PI must contact the Research Security office at rsp@gmu.edu before signing the MFTRP certification and submitting the RPPR.” Note: only the PIs will be able to see the certification and whether they signed. OSP will not have access to this information in research.gov.
3. NASA requires annual certification for MFTRP but does not require submission to NASA. The annual certification must be documented and maintained by the University. Mason is in the process of developing a policy to comply with this requirement.

4. NIH requires individuals serving as senior/key personnel for awards with RPPRs submitted on or after January 25, 2026 to certify participation or non-participation in a Malign Foreign Talent Program. It must be uploaded in Section G.1, Special Notice of Award and Funding Opportunity Announcement Reporting Requirements as a flattened PDF file. The file for each senior/key personnel must be named: 'MFTRPcert_[Name].pdf', where '[Name]' is the name of the senior/key person. Mason has created an annual MFTRP certification form for key personnel to use to meet this requirement.
5. When the RPPR is due, OSP Post award sends an email to each PI and administrator to start the process. The Mason Annual MFTRP certification form can be found on the OSP website: <https://osp.gmu.edu/wp-content/uploads/NIH-Annual-RPPR-MFTRP-Certification-2-13-26.pdf>

Stage: Post Award, Annual Re-certification (Subrecipient)

1. MFTRP re-certification is required annually for the duration of the subaward. Compliance with sponsor-specific requirements remains the responsibility of the subrecipient institution.
2. The Financial Analyst within the GMU Office of Sponsored Programs (OSP) will initiate the annual re-certification process by sending an email notification to the subrecipient's administrative contact. The Principal Investigator (PI) and Department Research Administrator will be copied on this communication. This email will outline the certification requirements and provide necessary instructions and documentation.
3. Upon notification, the subrecipient must ensure that all identified senior/key personnel: review and update their Current and Pending (Other) Support information, if applicable; and provide a PDF copy generated from SciENCv if updates are required. If senior/key personnel do not have updates within SciENCv or are unable to generate a PDF, they must instead complete the MFTRP certification form provided as an attachment in the OSP email.
4. The subrecipient must return all required documentation, including: updated Current and Pending Support PDFs (if applicable), and/or the completed MFTRP certification forms for each senior/key individual. All required documentation is due within 10 calendar days of the notification email. OSP will follow up as necessary to ensure the documentation is received in a timely manner. The PI and Department Research Administrator are responsible for ensuring that subrecipient recertifications are uploaded alongside George Mason University personnel certifications in accordance with institutional and sponsor requirements.

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