

## OVERVIEW

### Important Dates:

- Government wide implementation date required in NSPM-33 was August 8, 2024.

### Requirements:

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

NSF was the first agency implementing this requirement, effective for all proposals submitted on or after May 20, 2024. For NSF proposals, certification is included on the Biographical Sketch and the Current and Pending (Other) Support documents. These require the individual to certify that the individual is not a party to a MFTRP (see NSF PAPPG Chapters I.E.2.(b) and II.D.1.e for additional information) prior to proposal submission. NSF also requires all senior/key personnel on potential awards to submit updated Current and Pending (Other) Support information prior to making a funding recommendation. These requests are being emailed to the PI during the Just-In-Time (JIT) period, and includes a short turn-around due date. 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. Therefore, Mason is implementing a process to review all Federal Funding Opportunities for this requirement and conduct Malign Foreign Talent Recruitment Program (MFTRP) security reviews for federal proposals. This will ensure Mason is in compliance with Federal law and guidance.

### Mason Implementation

The MFTRP reviews and certifications will impact **ALL** of Mason's federal proposals. Information has been developed and shared with faculty and will be reissued.

Additionally, the Office of Research Integrity and Assurance (ORIA) has developed a process to meet the organizational due diligence requirements to verify that individuals are not party to a malign foreign talent recruitment program. With each Federal application submission, we must provide AOR certification 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.

ORIA personnel will be monitoring PI activity and reviewing Biosketch and Current and Pending disclosures. They will look at the disclosures as well other relevant sources and cross check information. Therefore, all federal proposals, regardless of whether they are required, must submit to OSP the complete Common Form Biosketch or Current and Pending with signed certification. OSP will submit these to ORIA for the MFTRP review, following the below process.

## Business Process: MFTRP Security Check

Stage: Prior to Department Review

Local Research Administrator (Administrative Contact)

1. Review all federal Funding Opportunities, including pass-through opportunities, to check if MFTRP certifications have been added.
  - All NSF proposals require use of Common Forms including MFTRP certification
  - For NASA proposals see NASA Addendum below.
  - OSP maintains a database of agency language, [see Matrix](#) and advise OSP of any needed updates
  - Review table of contents and opportunities for references to: Research Security, foreign influence, malign foreign talent, sponsored foreign talent, foreign recruitment, sponsored foreign government, National Defense authorization act, etc.
  - If there are agency specific certification documents required, please ensure PI completes and those are uploaded to RAMP along with a comment indicating there is an agency specific form or certification, not just the Common Form.
  - If there are no agency specific forms, please use the [OSTP Common Forms](#) for Biosketch and Current and Pending and follow process in Step 2 below.
  
2. Combine 1) Biosketches and 2) Current and Pending into a single document entitled MFTRP. Upload to FP>Attachments.
  - Biosketches for all senior/key personnel on the proposal (PIs, Co-PIs, faculty, subrecipient key personnel). Consultants only if they are listed as key personnel.

Budgets	SF424 Summary	History	Reviewers	Attachments
<b>Name</b>				
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				

3. Initiate the “MFTRP Security Check” ancillary review and assign to Organization>Research Integrity.

**Add Ancillary Review**

1. \* Select either an organization or a person as reviewer:

Organization: Research Integrity ⋮ +

Person:  ⋮

2. \* Review type:

NSF MFTRP Security Check ▾

3. \* Response required?

Yes  No [Clear](#)

4. Comments:

- **You do not have to wait for ORIA approval to complete Departmental Review and move to OSP Specialist Review.**
  - If key personnel are listed anywhere in a proposal, including consultants, ORIA will need to screen them.
  - Please see #4, the 2nd and 3<sup>rd</sup> bullets below regarding subrecipients.
  - If ORIA has not cleared a proposal by 2-days before deadline, please message them at [rampcoi@gmu.edu](mailto:rampcoi@gmu.edu)
  - AOR will not sign certification forms until ORIA has cleared proposal.
4. Prepare any additional documents per the RFP, agency guidance, or other sponsor instructions:
- If George Mason is the subrecipient, the MFTRP Security Check is still required. 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 Maggie Ewell, OSP Pre-Award Director, for guidance. If the form is just the organization certification, like the above, only OSP Pre-Award Director would sign, following completion of COI review.
  - Subrecipients to Mason will provide bios and C&P if required under the RFP/FOA for the MFTRP review. If the RFP/FOA does **not** require bios/C&Ps, Mason will not require the subrecipient to provide them if they object. However, if a subrecipient will not provide bios and C&Ps, please request a copy or link to institutional policies and procedures regarding MFTRP reviews so we can ensure a review is occurring.
  - For all Mason subrecipients, please have them include the following in their cover letter providing the organizational 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.*
  - For LOIs, if they are required to come through OSP, per the Mason policy, then they will complete a MFTRP review. LOIs submitted by PI, with no OSP involvement, do not require MFTRP review until they are invited to submit full proposal.

**Stage: Specialist Review**

**OSP Specialist**

1. Ensure the MFTRP Security Check is complete. It should state 'Yes' under 'Accepted':

**Manage Ancillary Reviews**

1. Identify each organization or person who should provide additional review.

Review Type	Org	Person	Reqd	Accepted	Notified	Comments
MFTRP Security Check	Research Integrity		yes	yes	yes	

2. You do not have to wait for ORIA approval to complete Specialist Review. For NASA proposals see NASA Addendum below.

3. Upon completing review, assign OSP AOR Review ancillary. Please remember:
  - a. AOR will hold approvals and signatures until ORIA approves the ancillary
  - b. If ORIA review results in required edits to Biosketches or C&Ps, OSP Specialist will work with Department RA to complete
  - c. If the proposal is ready, but awaiting ORIA approval two days prior to the Sponsor deadline, email [rampcoi@gmu.edu](mailto:rampcoi@gmu.edu)

## Addendum: NASA Review

### Stage: Prior to Department Review

#### Local Research Administrator (Administrative Contact)

1. Initiate and assign to the PI the **NASA China Restriction Certification Form** ancillary review in RAMP.
2. Ensure the PI receives and completes both **Attachment 1** and **Attachment 2**, the *Summary of Restrictions and Certification*, and *NASA Certification Regarding Chinese Affiliations*, respectively.
3. Confirm all named key personnel anticipated in the full proposal; inform the PI they will be responsible for securing a signed Attachment 2 from each.
  - a. Federal employees, including those of FFDRCs, are exempt from this requirement.
4. Receive signed Attachment 2 for all named key personnel and the PI. Review briefly to ensure each is signed in the correct place, e.g. under Step 2 for Step 2 proposals.
5. Ensure signed forms are uploaded to RAMP Attachments.
6. Send a RAMP email to assigned OSP Specialist notifying them the signed forms are uploaded.
7. Initiate and assign the **MFTRP Security Check** ancillary review prior to sending to Department Review (refer to MFTRP instructions above for details).

#### Principal Investigator

1. Complete both **Attachment 1** and **Attachment 2**, the *Summary of Restrictions and Certification*, and *NASA Certification Regarding Chinese Affiliations*, respectively.
2. Distribute and collect signed Attachment 2 forms from all named key personnel anticipated in the proposal.
  - a. Each Team Member proposed to be part of the research team including the PI, Co-PI, Collaborators, or others, whether paid or unpaid, whether affiliated with George Mason or a third party, and regardless of their nationality or immigration status (i.e., J-1, F-1, H-1B, etc.), will be required to complete the applicable form and return it to OSP Pre-Award staff via the PI.
  - b. Federal employees, including those of FFDRCs, are exempt from this requirement.
3. Complete the **NASA China Restriction Certification Form** ancillary review in RAMP. The ancillary is complete when it reads 'Yes' across:

<input type="button" value="Update"/>	NASA China Restriction Certification Form	<div style="background-color: black; width: 40px; height: 20px; margin: 0 auto;"></div> <div style="border: 1px solid red; padding: 2px; display: inline-block;">           yes    yes    yes         </div>	Hello [redacted], Can you please accept this ancillary review acknowledging that you and your team need to complete the NASA China Certification form? I have your signed form. Thank you, Sarah	<input type="button" value="✕"/>
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4. Email to the Administrative Contact or upload to RAMP the signed Attachments 1 and 2.

## Stage: Specialist Review

### OSP Specialist


- Review the following sections and documents to ensure they agree on the named personnel and their respective roles:

- RAMP FP: Personnel #11 (PI) and #13 (GMU key and non-key personnel)

**11. Program director / Principal investigator / Project lead / Fellow:**

Yunyao Li

**13. Project personnel:**

- Add other institutional key, non-key or other significant contributor personnel: 

Last Name	First Name	Key	Role
Sun	Ziheng	yes	Co-Investigator
Tong	Daniel	yes	Faculty

- RAMP FP: COI Disclosure Status

**1. FCOI Investigators:**

Name	Last COI Profile Update	COI Training Completed
Ziheng Sun	5/21/2024	5/21/2024
Yunyao Li	5/13/2024	5/13/2024
Daniel Tong	5/2/2024	5/21/2024

- Full Proposal: Section VI – Team Members

SECTION VI - Team Members				
Team Member Role <b>PI</b>	Team Member Name <b>Yunyao Li</b>	Contact Phone <b>240-472-8398</b>	E-mail Address <b>yli74@gmu.edu</b>	
Organization/Business Relationship <b>George Mason University</b>		UEI <b>EADLFP7Z72E5</b>	EFT	CAGE Code <b>7X764</b>
International Participation <b>No</b>	U.S. Government Agency		Total Funds Requested <b>0.00</b>	
Team Member Role <b>Co-I</b>	Team Member Name <b>Anton Darmenov</b>	Contact Phone <b>301-614-5493</b>	E-mail Address <b>anton.s.darmenov@nasa.gov</b>	
Organization/Business Relationship <b>NASA Goddard Space Flight Center</b>		UEI <b>EFX9AMALVGN3</b>	EFT	CAGE Code <b>36FC1</b>
International Participation <b>No</b>	U.S. Government Agency <b>NASA Goddard Space Flight Center</b>		Total Funds Requested <b>120,125.00</b>	
Team Member Role <b>Co-I</b>	Team Member Name <b>Ziheng Sun</b>	Contact Phone <b>703-537-9353</b>	E-mail Address <b>zsun@gmu.edu</b>	
Organization/Business Relationship <b>George Mason University</b>		UEI <b>EADLFP7Z72E5</b>	EFT	CAGE Code <b>7X764</b>
International Participation <b>No</b>	U.S. Government Agency		Total Funds Requested <b>0.00</b>	
Team Member Role <b>Collaborator</b>	Team Member Name <b>Daniel Tong</b>	Contact Phone <b>919-280-6656</b>	E-mail Address <b>qtong@gmu.edu</b>	
Organization/Business Relationship <b>George Mason University</b>		UEI <b>EADLFP7Z72E5</b>	EFT	CAGE Code <b>7X764</b>
International Participation <b>No</b>	U.S. Government Agency		Total Funds Requested <b>0.00</b>	

d. Budget & Justification: Personnel section

PERSONNEL COSTS		
Staff Member (Faculty, Post-Docs, Admin Faculty, Classified Staff) <b>Unhide</b> to use more lines	is Key?	Role
Dr. Yunyao Li	YES	PD/PI
Dr. Yunyao Li	YES	PD/PI
Dr. Ziheng Sun	YES	Co-PD/PI
Dr. Daniel Tong	YES	Faculty
Dr. Yunyao Li	YES	PD/PI
Dr. Ziheng Sun	YES	Co-PD/PI

**PERSONNEL COSTS**

**Key Personnel**

Principal Investigator – Dr. Yunyao Li will design and lead the performance of the project as described in the goals/aims of this proposal, build the S2S forecast model, coordinate and lead meetings with their research team, supervise GRAs, prepare manuscripts for publication, prepare annual progress reports, etc. She will dedicate 3.41 months in year 1, 3 months in year 2, and 1 month in years 3 and 4.

Co-Investigator – Dr. Ziheng Sun will dedicate 2.4 months in years 1 and 2 and 1 month in years 3 and 4. Dr. Sun will be responsible for the AI model setup and tuning.

**Other Personnel**

Collaborator– Dr. Daniel Tong will dedicate .25 summer months in years 3 and 4. He will lead the stakeholder engagement

2. Review Attachment 1 and Attachment 2 and ensure:
  - a. The PI has answered all questions in full and signed Attachment 1 and Attachment 2.
  - b. The PI and all non-federal key personnel (see #1 directly above) have completed and signed the forms
  - c. All questions clearly indicate a No or Yes response.
  - d. All Yes responses have a corresponding entry under ‘Description’.
3. **If all Attachments certify ‘No’, proceed to Step 6.**
4. If any single response on either Attachment says ‘Yes’, secure a Description from the PI and immediately notify your Manager via email and provide:
  - a. All Attachments with a Yes response
  - b. The corresponding Current and Pending(s) (C&Ps) and Biosketch or CV regardless if required by the solicitation.
5. The Manager will resolve any possible issues and advise when the Attachments are approved for AOR signature (see step 6).
6. Ensure the MFTRP Security Check is complete. It should state ‘Yes’ under ‘Accepted’:

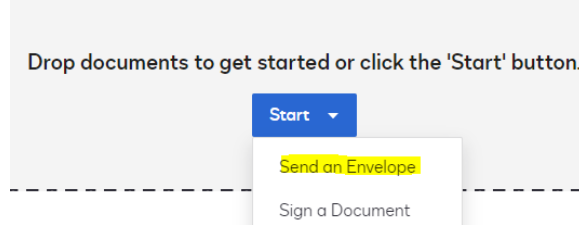
**Manage Ancillary Reviews**

1. Identify each organization or person who should provide additional review.

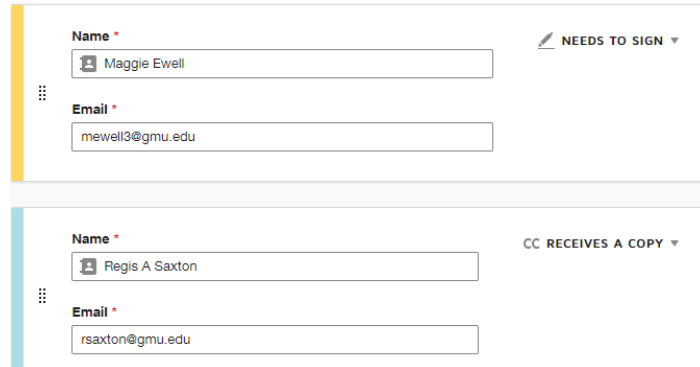
+ Add							
	Review Type	Org	Person	Reqd	Accepted	Notified	Comments
 Update	MFTRP Security Check	Research Integrity		yes	yes	yes	

7. Once Steps 3 or 4-6 are complete, initiate and assign to the AOR the **NASA China Restriction Certification Form** ancillary review in RAMP.

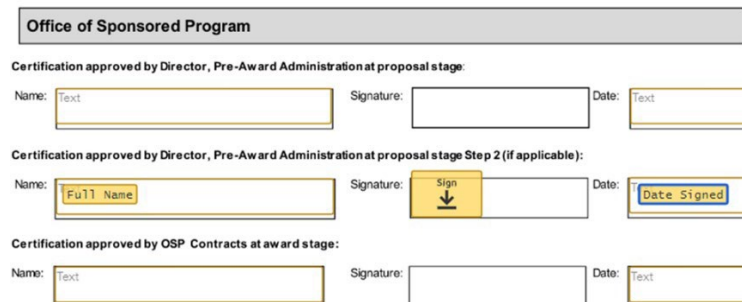
8. Simultaneous with Step 7, secure AOR signature via DocuSign on all signed certifications:
  - a. Login to DocuSign and choose 'Send an Envelope':



- b. Upload completed certifications and add the AOR to sign and your Team Manager as receiving a copy



- c. In email subject put this naming convention: **Complete with DocuSign: NASA Certs, FP# Stage [1 or 2] Short Title** (e.g., *Complete with DocuSign: NASA Certs, FP2251 Stage 2 Yigit\_CPI/NASA\_11/16/23*)
    - d. Hit *Next*. You will then be able to assign Standard Fields. Under the relevant section(s) add *Full Name*, a *signature* block, and a *Date Signed* block, as shown below. It is important to make sure all three boxes have flags, because if just signature is flagged, docuSign will not allow AOR to add Name or Date.
    - e. Ensure the signature block appears in the correct section (e.g., Step 2 proposals should be signed under the Step 2 section).



- f. Hit *Send*.
    - g. Combine all signed certifications into a single PDF by printing them to PDF individually, then combining into a single document. Upload this complete document to RAMP Attachments, and delete duplicates so only the combined, fully signed forms remain under Attachments.