

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 research 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 research proposals submitted on or after May 20, 2024. For NSF research 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 research 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 research funding opportunities for this requirement and conduct Malign Foreign Talent Recruitment Program (MFTRP) security reviews for federal research proposals. This will ensure Mason is in compliance with Federal law and guidance.

In Mason's examination of the CHIPS and Science Act of 2022, as well as NSF 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.

Mason Implementation

The MFTRP reviews and certifications will impact ALL of Mason's federal research proposals, including LOIs submitted by OSP. 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 research proposals, regardless of whether they are required, must submit to OSP the complete Common Form Biosketch or Current and Pending with signed certification. Departmental Research Administrator will submit these to ORIA for the MFTRP review, following the below process. If you have any questions, please contact rsp@gmu.edu.

Business Process: MFTRP Security Check

Stage: Prior to Department Review

Department Research Administrator (Administrative Contact) responsibilities

1. Check in RAMP to see if Research is selection under Question 7 one General Proposal Information page. If Research is selected, no matter which sub area 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 all federal research Funding Opportunities, including pass-through opportunities, to check if MFTRP certifications have been added.
 - o All NSF research proposals require use of Common Forms including MFTRP certification
 - o For NASA research proposals, see NASA Addendum below.
 - o OSP maintains a database of agency language, [see Matrix](#) and advise OSP of any needed updates
 - o 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.
 - o 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.
 - o 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.
3. Combine 1) Biosketches and 2) Current and Pending into a single document entitled MFTRP_FPXXX_PI name_Sponsor. Upload to FP>Attachments.
 - o Biosketches for all senior/key personnel on the research proposal (PIs, Co-PIs, faculty, subrecipient key personnel). Consultants only if they are listed as key personnel.

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. Prepare any additional documents per the RFP, agency guidance, or other sponsor instructions:

- 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 research proposal.
- 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.
 - 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. If the subrecipient refuses, please advise OSP team manager so we can consult ORIA.
- 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.

Stage: Specialist Review

OSP Specialist responsibilities

- Ensure the MFTRP Attachment is in RAMP.

Stage: Post Award, Award Set up, Annual Report

OSP Post Award Research Administrator responsibilities

- OSP Post Award RA will add 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 export@gmu.edu before signing the MFTRP certification and submitting the RPPR.”
- 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

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.

- 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 export@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.
- 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.

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.

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="checkbox"/> Update <small>NASA China Restriction Certification Form</small>	[REDACTED]	yes	yes	yes
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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



4. Email to the Administrative Contact or upload to RAMP the signed Attachments 1 and 2.

Stage: Specialist Review

OSP Specialist

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

a. 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:

a. 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

b. 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

c. Full Proposal: Section VI – Team Members

SECTION VI - Team Members				
Team Member Role	Team Member Name	Contact Phone	E-mail Address	
PI	Yunyao Li	240-472-8398	yl74@gmu.edu	
Organization/Business Relationship	George Mason University	UEI	EFT	CAGE Code
		EADLFPTZ72E5		7X764
International Participation No	U.S. Government Agency		Total Funds Requested	0.00
Team Member Role	Team Member Name	Contact Phone	E-mail Address	
Co-I	Anton Darmenov	301-614-5493	anton.s.darmenov@nasa.gov	
Organization/Business Relationship	NASA Goddard Space Flight Center	UEI	EFT	CAGE Code
		EFX9AMALVGN3		36FC1
International Participation No	U.S. Government Agency		Total Funds Requested	120,125.00
Team Member Role	Team Member Name	Contact Phone	E-mail Address	
Co-I	Ziheng Sun	703-537-9353	zsun@gmu.edu	
Organization/Business Relationship	George Mason University	UEI	EFT	CAGE Code
		EADLFPTZ72E5		7X764
International Participation No	U.S. Government Agency		Total Funds Requested	0.00
Team Member Role	Team Member Name	Contact Phone	E-mail Address	
Collaborator	Daniel Tong	919-280-6656	qtong@gmu.edu	
Organization/Business Relationship	George Mason University	UEI	EFT	CAGE Code
		EADLFPTZ72E5		7X764
International Participation No	U.S. Government Agency		Total Funds Requested	0.00

d. Budget & Justification: Personnel section

PERSONNEL COSTS		<u>is Key?</u>	<u>Role</u>
Staff Member (Faculty, Post-Docs, Admin Faculty, Classified Staff) Unhide to use more lines			
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

2. Review Attachment 1 and Attachment 2 and ensure:

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.

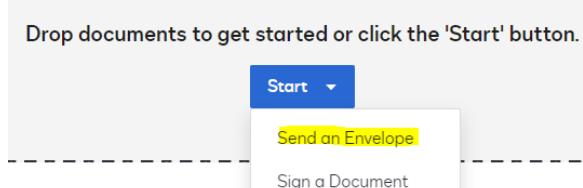
Other Personnel

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

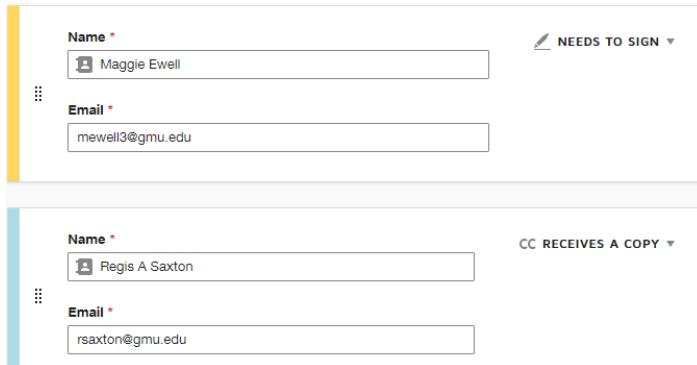
- The PI has answered all questions in full and signed Attachment 1 and Attachment 2.
- The PI and all non-federal key personnel (see #1 directly above) have completed and signed the forms
- All questions clearly indicate a No or Yes response.
- All Yes responses have a corresponding entry under 'Description'.

3. If all Attachments certify 'No', proceed to Step 6.

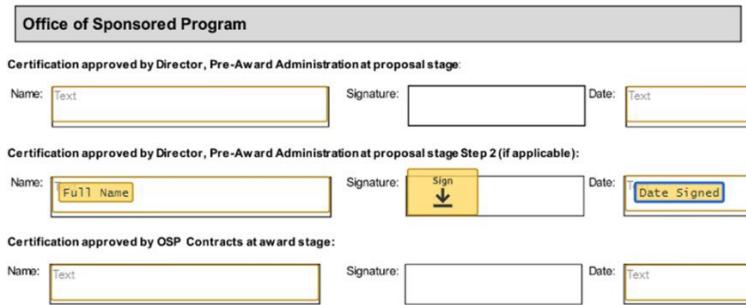
- If any single response on either Attachment says 'Yes', secure a Description from the PI and immediately notify your Manager via email and provide:
 - All Attachments with a Yes response
 - The corresponding Current and Pending(s) (C&Ps) and Biosketch or CV regardless if required by the solicitation.
- The Manager will resolve any possible issues and advise when the Attachments are approved for AOR signature (see step 6).
- Once Steps 3 or 4-6 are complete, initiate and assign to the AOR the **NASA China Restriction Certification Form** ancillary review in RAMP.
- Simultaneous with Step 7, secure AOR signature via DocuSign on all signed certifications:
 - Login to DocuSign and choose 'Send an Envelope':



- 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.